

# **BURNS PET NUTRITION PRIVACY NOTICE AND COOKIE POLICY**

## **Introduction**

Welcome to Burns Pet Nutrition Ltd's privacy notice.

This privacy notice and cookies policy (and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting <https://burnspet.co.uk/> you are accepting and consenting to the practices described in this notice.

We respect your privacy and we are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

## **1 Important information and who we are**

### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Burns Pet Nutrition collects and processes your personal data through your use of this website, including any data you may provide through this website when you order any goods, subscribe to our e-magazine (The Tailchaser Times) or use our advice helpline.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **Controller**

Burns Pet Nutrition Ltd is the data controller and is responsible for this website.

We have appointed a Data Protection Officer (**DPO**), who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact our DPO either by post or by email using the details set out below.

### **Contact details**

Our full details are:

Burns Pet Nutrition Ltd

F.A.O Data Protection Officer

Email address: [dpo@burnspet.co.uk](mailto:dpo@burnspet.co.uk)

Postal address: 99 Ferry Road, Kidwelly, Dyfed, SA17 5EJ

Telephone number: 01554 890482

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **Changes to the privacy notice and your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2 The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, last name, title.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3 How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - purchase or enquire about products or services;
  - subscribe to our quarterly E-magazine, The Tailchaser Times;
  - use our advice helpline;
  - request marketing information to be sent to you; or
  - give us some feedback or report a problem with our site.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see "How we use cookies" below for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
  - Technical Data from analytics providers such as Google Analytics based outside the EU.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside and outside the EU.

### **4 How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (i.e. by processing your orders).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to

you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please paragraph contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you for news alerts	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To enable you to download copies of our E-Magazine, The Tailchaser Times and other documents	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To register your enquiry	(a) Identity (b) Contact	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To manage and administer your account with us and to process and deliver your order including: (a) manage payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)

(b) collect and recover money owed to us	(e) Marketing and Communications	
To manage our relationship with you which will include: (a) responding to enquiries or requests from you (b) notifying you about changes to our terms or privacy policy (c) asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To allow you to participate in interactive features of our service, when you choose to do so	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To make suggestions and recommendations to you and other users of our site about goods or	(a) Identity (b) Contact	Necessary for our legitimate interests (to develop our

services that may be of interest to you	(c) Technical (d) Usage (e) Profile	products/services and grow our business)
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## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any company for marketing purposes.

### Opting out

You can ask us to stop sending you marketing messages at any time by contacting our DPO at any time via email: [dpo@burnspet.co.uk](mailto:dpo@burnspet.co.uk).

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access

to your computer or any information about you, other than the data you choose to share with us.

We have already set cookies which are essential for the operation of this site but some additional cookies are also used for other features. You must consent to the use of these cookies before they are implemented. These additional cookies are listed below.

#### E-Commerce Tracking

This website uses E-Commerce tracking via Google Analytics. By using this service we can identify which products are performing best and make improvements as necessary. To access this information we may use your Burns transaction data and purchase activity.

#### Google Analytics

This site uses Google Analytics – a web analytics service provided by Google, Inc. Google Analytics sets number of cookies (default is 4) in order to evaluate your use of the site and compile reports for us on activity on the site. Google stores the information collected by the cookie on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

Google Inc are members of the US Safe Harbor Scheme. This scheme allows the transfer of data from within the EEA to countries that are outside of the EEA without having to enter into a specific data transfer agreement.

Companies that sign up to the scheme are deemed to provide adequate protection for personal data transmitted from Europe. Google Inc's registration is at <http://safeharbor.export.gov/companyinfo.aspx?id=10543>.

For more information on the cookies set by Google Analytics please go to: <http://code.google.com/apis/analytics/docs/concepts/gaConceptsCookies.html>.

Google has also created their own opt-out plugin which you can get from: <http://tools.google.com/dlpage/gaoptout>.

#### Social Media (Facebook, Twitter, Instagram and YouTube)

This website uses social media widgets which facilitate the ease of sharing of pages/links from this website across various social networks such as Facebook, Twitter, YouTube and Instagram. These social media widgets use cookies which monitor "click-stream" activity, e.g. web pages viewed, navigation from page to page, time spent on each page etc.

#### Live Chat

We have partners that provide our FAQs and Live Chat functionality. Cookies are used to remember a user during a visit.

#### Links to External Websites

Our website may contain links to other websites where there is a legitimate interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should

exercise caution and look at the privacy statement applicable to the website in question.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5 Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6 International transfers**

We are based in the UK and your personal information is stored within the European Economic Area (EEA). We do not transfer your personal information outside the EEA. We have put in place measures to ensure that your personal information is protected if it is required to be accessed from outside the EEA.

## **7 Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at

your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 8 Data retention

We will generally hold your information for a period of three years.

## 9 Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.  
Commonly known as a "data subject access request" – this enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of your personal data.  
This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data.  
This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. However, we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data.  
The right to object exists where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing your personal data.  
This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request transfer of your personal data.  
Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data

in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Right to withdraw consent.

This right exists where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10 Glossary**

### **Lawful basis**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **Third parties**

External third parties means:

- Service providers acting as processors based in the United Kingdom who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Advertisers and advertising networks based in the United Kingdom that require the data to select and serve relevant adverts to you and others – we do not disclose information about identifiable individuals to our advertisers, but we may provide them with Aggregated Data.
- Analytics and search engine providers based outside the EEA that assist us in the improvement and optimisation of our site.