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www.positivepetbehaviour.co.uk

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PRIVACY POLICY – POSITIVE PET BEHAVIOUR LTD

What is our Privacy Policy?

We ask that you read this privacy policy carefully as it is important that you understand what information we hold about you and how this information is used, stored, and shared. This policy sets out important information about your rights in relation to your personal data and how to contact us and relevant authorities in the rare event of a complaint.

Who are we?

We are Positive Pet Behaviour, a private limited company registered in England and Wales with company registration number: 12090097 and registered company address: 6 The Orchards, Hucclecote, Gloucestershire, GL3 3RL.

We collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation (**GDPR**) which applies across the European Union (including the United Kingdom) and we are responsible as a 'controller' of that personal information for the purposes of those laws. We may also act as a 'processor' of personal information where we receive personal information from a third party to process on their instructions.

Tell us about the Collection and use of your Personal Information

Positive Pet Behaviour collects personal data about you when you access our website, register online, contact us or send a query via our website, send us feedback, purchase services from us, complete a new client questionnaire or insurance form, or verbally or in writing inform us of a change in circumstance (for example if you move house and would like us to update your address).



APBC
ASSOCIATION OF PET
BEHAVIOUR COUNSELLORS



SETTING
VETERINARY
STANDARDS



ANIMAL BEHAVIOUR
& TRAINING COUNCIL



Professional Association
of Canine Trainers



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We may also collect personal information about you such as your name, address and contact details from your referring veterinarian where you are referred to us by them to provide our services.

The personal information we collect about you depends on the particular activities carried out through our website or the services we provide to you. This information includes:

- Your name, names of your family members, home address, email address, and telephone numbers.
- Bank account and payment details.
- Notes about communications with your veterinary practice
- Details of any feedback you give us by phone, email, post or via social media.
- Information about the services we provide to you.

Please note, the term 'personal data' covered by GDPR does not include information about animals.

We use this personal information to:

- Create and manage your account with us.
- Verify your identity.
- Provide our services to you.
- Provide information to or correspond with your insurer on your behalf.
- Notify you of any changes to our website or to our services that may affect you.
- Improve our services.



What is the Legal Basis for Processing your Personal Information?

When we use your personal information, we are required to have a legal reason for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why.

The legal bases we may rely on include:

- **Consent:** where you have given us clear consent for us to process your personal information for a specific purpose.
- **Contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations).
- **Legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests).

Who do we Share your Personal Information with?

Where we provide services to you and you have been referred to us by a veterinarian, we will share information which may include personal information with the veterinary practice which referred you to us. This data sharing enables your referring vet to be kept informed about our discussion and plan for the treatment of your pet. This allows a continuity of care and is in your pet's best interest.

We may share your name and contact details and, if appropriate our case notes, with other professionals in the veterinary sector where we have agreed this with you, for example where we deem it appropriate to refer your pet to another field of veterinary medicine.



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We may share your name, contact details and, if appropriate our case notes, with another training professional (for example a dog trainer), if after discussion with you, we mutually decide this would benefit your pet.

We may share your personal data with your insurer where you ask us to assist you with an insurance claim.

We will share personal information with law enforcement or other authorities if required by applicable law.

We may disclose your personal data to our professional advisers and/or insurers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice and managing legal disputes and/or making insurance claims.

We will not share your personal information with any other third party.

How do we store your data?

We currently store your data securely on a cloud-based storage programme.

Communications via email are stored locally on a computer owned by Positive Pet Behaviour and accessed only by the Behaviourist. Access to both the computer and email account is password protected.

Our Marketing

We would like to send you information about our services, special offers and newsletters, which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email, telephone, or text message (SMS).



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We will only ask whether you would like us to send you marketing messages when you tick the relevant boxes or otherwise confirm your consent when you contact us by email or engage us to provide services.

If you have previously agreed to being contacted in this way, you can unsubscribe at any time by contacting us at debbie@positivepetbehaviour.co.uk

For more information on your rights in relation to marketing, see 'What are your data protection rights?' below.

What are your Data Protection Rights?

The right to access: You have the right to access your personal information and to request a copy of the personal data we hold about you at any time. If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at debbie@positivepetbehaviour.co.uk.

The right to rectification: You have the right to request that Positive Pet Behaviour corrects any information we hold about you which you believe to be inaccurate.

The right to erasure: You have the right to request we erase your personal data concerning you in certain situations.

These circumstances include the following:

- It is no longer necessary for us to hold those personal data in relation to the purposes for which they were originally collected or otherwise processed.
- You withdraw your consent to any processing which requires consent.
- The processing is for direct marketing purposes
- The personal data has been unlawfully processed.



However, there are certain general exclusions of the right to erasure, including where processing is necessary:

- For exercising the right of freedom of expression and information.
- For compliance with a legal obligation.
- For establishing, exercising, or defending legal claims.

The right to restrict processing: You have the right to request Positive Pet Behaviour restrict the processing of your data, under certain conditions.

The right to object to processing: You have the right to object to our company processing your personal data, under certain conditions.

The right to data portability: You have the right to request Positive Pet behaviour transfers your data to another organisation, or to you, under certain conditions.

Cookie Policy

For information about how we use Cookies please see our Cookie Policy available on our website <https://www.positivepetbehaviour.co.uk>

How to Contact us

Please contact us by email using the email address: debbie@positivepetbehaviour.co.uk or by post to Debbie Bryon, 6 The Orchards, Hucclecote, Gloucestershire, GL3 3RL if you have any questions about this Privacy Policy or the information, we hold about you.



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How to Complain

We hope that we can resolve any query or concern you may raise about our use of your information.

GDPR also gives you right to lodge a complaint with a relevant authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

