IMBERPARK'S PRIVACY NOTICE FOR THE SHOP

Reasons for us holding your Data

On 25 May 2018 the Government's General Data Protection Regulations come into force. These are designed to protect your privacy, and as a result we are required to give you certain information about the data you provide to us, and how we will use it. 'Data' simply means information.

You have purchased items from Imberpark for a pet. You need to be aware that Imberpark maintains a data-base of its loyal retail customers, which you can ask us to include you in.

This data-base is used by us to alert you to our sales promotions, special offers or other items which we think may be of interest to you. It is **not** used for any other purpose.

To enable us to include you in that data-base, we will need you to provide us with information about yourself and your pet, which will be kept in Imberpark's computerised retail electronic data base. This system is <u>password protected</u> and the contents are only available to senior Imberpark staff. The data held will consist of your contact details and information concerning your pet and any related matters which assists us in providing a better service to you.

As a small company Imberpark does not have a designated Data Protection Officer, but if you have any questions in relation to this Privacy Policy, please ask a senior member of Imberpark's staff.

Destruction of your Data

We will regularly review our database to ensure that it is up to date and your details will be deleted two years after you have last purchased pet-related items from Imberpark. This will happen even though you may have boarded your pet with us in that two year period, unless you have given us permission to hold your data for longer, or unless it is necessary to do so to comply with our own legal obligations. See the section below headed up 'Your Rights'.

The Legal Reasons for Imberpark holding your Data

The law requires us to advise you of the legal basis on which we are holding and will process your data. 'Processing' is the word used in the GDPR to describe any activity we may undertake which involves using or maintaining your data, such as noting a change of your phone number in our database. The GDPR provide a number of grounds on which organisations may process data. We rely on 2 of these.

- i) We need to run our business efficiently and in particular to help us to give you as an Imberpark customer the benefit of any offer, which we can make to you. GDPR describes this as the **Legitimate Interests** basis.
- iii) We have to maintain records to comply with the laws which apply to businesses both of our type specifically, and businesses more generally. We will always retain sufficient and appropriate

information to enable us to comply with our obligations to regulatory bodies such as the, local authority and HMRC for tax purposes. GDPR calls this the **Legal Obligation** basis.

In certain circumstances we may ask you to sign a separate consent form for information in Special Categories.

Your Rights

You are entitled to request a copy of all the data held by us on you/your matter, under the Freedom of Information Act 2000. In order to do this, you must make it clear that you are requesting information under this provision, and we are obliged to provide the information to you within 40 days of receipt of the request. We will require you to verify your identity by reasonable means before handing that information over. That will usually take the form of a passport or driving licence plus a utility bill or similar dated within the last three months.

The GDPR also gives you certain other rights, such as the right to have your personal data rectified if it is inaccurate or incomplete. If you find that we have incorrectly noted some detail, please advise us as soon as possible and we will amend our records accordingly.

Also, the GDPR gives you to erasure (the "right to be forgotten"). In practice this means that you may ask us to delete any information we are holding, but not where we are otherwise required to retain it to comply with either Legitimate Interests or Legal Obligations. This right can be exercised at any time.

Publicity

We will not disclose confidential information received from you to third parties without your express written permission. However, we may refer to your matter generally in our publicity, without reference to yourself, but without disclosing any specific information by which you or your pet might be identified.

Some information concerning you or your pet may be on public record, for instance reports in the newspaper of your pet winning a prize at a show, and we may refer to this specifically.

By accepting these Terms and Conditions you give your consent to such publicity.

Marketing

We will only use your data for the purpose of marketing by ourselves, and it will not be disclosed to third parties, unless you have first separately given us your express permission to us making that disclosure.

By signing this document you are consenting to our retention and use of your data as set out in this
Privacy Statement.

Signed.....

Dated.....

<u>Consent</u>