



## **Privacy and Cookie Policy**

### **1. Introduction**

- 1.1 We are committed to safeguarding the privacy of our website visitors and service users.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of [our website visitors and service users]; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this policy, "we", "us" and "our" refer to Highland Clinical Canine Massage. For more information about us, see Section 12.

### **2. Credit**

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com/free-legal-documents/privacy-policy>).

### **3. The personal data we collect**

- 3.1 In this Section 3 we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.
- 3.2 We may process data enabling us to get in touch with you ("**contact data**"). The data may include your name, home address, telephone/mobile number(s), email address and/or social media account identifiers. The source of the contact data is you. If you log into our website using a social media account, we will obtain elements of the contact data from the relevant social media account provider. The legal basis for this processing is consent.
- 3.4 We may process your personal data that is provided in the course of the use of our services ("**service data**"). The service data may include your name,

home address, telephone/mobile number(s) and email address. The source of the service data is you. The legal basis for this processing is consent.

- 3.5 We may process information that you provide for publication (such as testimonials and photographs) on our website or Facebook products ("**publication data**"). The source of this publication data is you. The legal basis for this processing is consent.
- 3.6 We may process information relating to transactions, including purchases of services, that you enter into with us ("**transaction data**"). The transaction data may include your name and transaction details including the date, amount paid and method of payment (Cash, Cheque or BACS). The source of the transaction data is you. The legal basis for this processing is consent.
- 3.7 We may process data about your use of our website and Facebook products ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. The legal basis for this processing is consent.
- 3.8 Please do not supply any other person's personal data to us.

#### **4. Purposes of processing and legal bases**

- 4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.
- 4.2 **Operations** - We may process your contact/service/transaction data for providing our services, generating invoices, bills/other payment-related documentation, veterinary reports and insurance claim documents. The legal basis for this processing is our legitimate interests, namely the proper administration of our services and business.
- 4.3 **Relationships and communications** - We may process your contact data for the purposes of managing our relationships. Communication with you is via email, SMS, telephone or Facebook products. The legal basis for this processing is our legitimate interests, namely communications with our individual customers, website visitors, Facebook products users and service users.
- 4.4 **Research and analysis** - We may process usage data for the purposes of researching and analysing the use of our website and services, as well as researching and analysing other interactions with our business. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our website, services and business generally.
- 4.5 **Record keeping** - We may process your contact/service/transaction data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access

to all the information we need to properly and efficiently run our business in accordance with this policy.

- 4.6 **Publications** - We may process publication data for the purposes of publishing such data on our website and/or Facebook products. The legal basis for this processing is consent, namely the publication of content in the ordinary course of our operations.
- 4.7 **Security** - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.
- 4.8 **Insurance and risk management** - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 4.9 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 4.10 **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person. The legal basis for this processing is legal requirement.

## **5. Providing your personal data to others**

- 5.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 5.2 We may disclose your contact/service data to your veterinarian where such disclosure is necessary for obtaining veterinary consent, obtaining professional advice, providing them with a veterinary report and/or referring back to them. Consent will always be obtained (which may be verbal) before this is done.
- 5.3 We may disclose your contact/service/transaction data to your own pet insurer where such disclosure is necessary for them to process your claim. Consent will always be obtained (which may be verbal) before this is done.
- 5.4 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for

compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **6. International transfers of your personal data**

- 6.1 In this Section 6, we provide information about the circumstances in which your personal data may be transferred to countries outside the United Kingdom and the European Economic Area (EEA).
- 6.2 Our company website is hosted on the Wix.com platform. Wix has servers all over the world, including Europe and the US, as well as back up servers. Wix.com, including Wix.com applications, stores data on secure servers behind a firewall.
- 6.2 You acknowledge that publication data may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## **7. Retaining and deleting personal data**

- 7.1 This Section 7 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 7.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 We will retain your personal data as follows:
  - (a) service data will be retained for a period of 7 years following the last occasion on which our services were used.
  - (b) transaction data will be retained for a period of 7 years following the last occasion on which our services were used.

Please note that the above retention periods are an insurance condition.

- 7.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:
  - (a) the period of retention of publication data will be determined based on the assumption that your consent for the data to remain published is ongoing unless you advise otherwise.
  - (b) the period of retention of contact data will be determined based on the outcome of the contact. If you advise that our services are not used/required your personal data will not be retained. If our services are used contact data will be retained for a period of 7 years following the last occasion on which our services were used.

- 7.5 Notwithstanding the other provisions of this Section 7, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **8. Your rights**

- 8.1 In this Section 8, we have listed the rights that you have under data protection law.
- 8.2 Your principal rights under data protection law are:
- (a) **the right to access** - you can ask for copies of your personal data;
  - (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
  - (c) **the right to erasure** - you can ask us to erase your personal data;
  - (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
  - (e) **the right to object to processing** - you can object to the processing of your personal data;
  - (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
  - (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
  - (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.
- 8.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.
- 8.4 You may exercise any of your rights in relation to your personal data by emailing us at [suzanne@highlandcaninemassage.co.uk](mailto:suzanne@highlandcaninemassage.co.uk).

## **9. About cookies**

- 9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session

cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

- 9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **10. Cookies used by our service providers**

- 10.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website or Facebook page.

- 10.2 Our website is hosted by Wix.com and we do not use Google Analytics on it. The following 'strictly necessary' cookies are used:

<b>Description of Cookie</b>	<b>Lifespan</b>	<b>Purpose</b>
svSession	Persistent	Identifies unique visitors and tracks a visitor's sessions on a site
hs	Session	Security
XSRF-TOKEN	Session	Security
smSession	Persistent (Two Weeks)	Identified logged in site members
TSxxxxxxxx (where x is replaced with a random series of numbers and letters)	Session	Security
TSxxxxxxxx_d (where x is replaced with a random series of numbers and letters)	Session	Security
RequestID	Session	Tracks visitor behavior and measures site performance

- 10.3 We use Facebook products to provide our Facebook page, Instagram page and Messenger service. You can view the privacy policy of this service provider at: <https://www.facebook.com/about/privacy/update> and their cookie policy at: <https://www.facebook.com/policies/cookies/>. We do not use Instagram API.

- 10.4 Some of the information collected by Facebook (Facebook Ireland Limited) is provided to us, as the operator of our Facebook page, in the form of anonymized aggregated insights and statistics. This information is known as 'insights' and allows us to understand how people engage with our Facebook page. The primary responsibility for the processing of insights data and compliance with GDPR (General Data Protection Regulation) is held by Facebook (Facebook Ireland Limited) and this includes all personal data. Highland Clinical Canine Massage as a Facebook page operator will comply with all applicable legal obligations required as a joint, secondary controller in regards Facebook page insights. Further information can be viewed at: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum).

## **11. Managing cookies**

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <https://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

## **12. Our details**

12.1 The website [www.highlandcaninemassage.co.uk](http://www.highlandcaninemassage.co.uk) is owned and operated by Suzanne Alexander of Highland Clinical Canine Massage.

12.2 You can contact us:

- (a) by email: [suzanne@highlandcaninemassage.co.uk](mailto:suzanne@highlandcaninemassage.co.uk).
- (b) by phone: 07739 562576.

## **13. Data protection fee**

13.1 As required by law, we are registered with the Information Commissioner's Office and pay the required annual fee.