

CHARITY BUDDY CIO T/A PETREHOMER - PRIVACY POLICY

This is the privacy policy of Charity Buddy a Charitable Incorporated Organisation (company number CE021711), whose registered office is at Maple Farm, Rosemary Lane, Alfold, Surrey GU6 8EZ, and e-mail is info@petrehome.org.

1. INTRODUCTION

- 1.1 We have published this policy with the view of engendering your trust in our processes, so that you understand what we do and why, and in order that, if you wish to challenge them, you have information about your rights. This policy is not detailed with respect to all aspects of our processing of personal data because so much depends on the prevailing circumstances. We have given as much information as we can by way of default, and we supplement this where appropriate in our detailed dealings with customers and others.
- 1.2 Charity Buddy is a registered charity providing the PetRehomer platform/website to support the public in the rehoming and adoption of pets.
- 1.3 The important information set out below concerns our processing of data relating to living individuals by reference to the purposes for which we do so in the context of that business. The information in each section on the basis on which we process personal data; the types of personal data; the categories of individuals; the sources from which we obtain personal data; the disclosure of personal data; and how long we keep personal data, relates to the particular purpose. The same personal data may be processed for more than one purpose, and so for information about that processing, please refer to the relevant purpose.
- 1.4 The purposes are as follows:
 - 1.4.1 [Marketing](#)
 - 1.4.2 [Accepting a customer](#)
 - 1.4.3 [Dealing with a customer](#)
 - 1.4.4 [Delivering our products and services to customers which involve processing personal data about them, or others associated with them, such as family members, shareholders, and officers, employees, agents, and contractors](#)
 - 1.4.5 [Dealing with people who are not customers](#)
 - 1.4.6 [Keeping records and accounts](#)
 - 1.4.7 [Operating our business](#)
- 1.5 We have included sections describing your rights, our contact information, and how you can make a complaint.
- 1.6 In the electronic form of this policy, you can navigate to the sections which are of interest to you by clicking on the description of the purpose or the reference to the section.

2. MARKETING

2.1 The basis on which we process data

2.1.1 Our charity thrives because we take pride in it and provide a first-class service, but the market in which we operate is competitive. To that end, we have a legitimate interest in marketing our products and services to existing and potential customers.

2.1.2 The steps we take to attract potential customers bring us directly and indirectly into contact with them to communicate information about our products and services. We are not intrusive and always respect the wishes of individuals once we are aware of them.

2.2 Types of personal data

2.2.1 We process the following classes of personal data in connection with our marketing:

- (a) contact details, including address, telephone numbers, and email
- (b) personal interests

2.2.2 We use this data to:

- (a) communicate directly with people via telephone, email, SMS text, and other forms of electronic communication; and
- (b) send people materials about our business, relevant offers from partner organisations, events, and publications.

2.3 Categories of individual

We process data on individuals who are:

2.3.1 Past customers who we think may still be interested in our products and services, current, and prospective customers.

2.3.2 Contacts of our members of staff.

2.3.3 Employees and other representatives of organisations which are past customers who we think may still be interested in our products and services, current, and prospective customers.

2.4 Sources of personal data

2.4.1 The people themselves, including via our website.

2.4.2 Social media, including Facebook, MailChimp, Instagram and Twitter.

2.4.3 Home checks undertaken by a third party.

2.5 Disclosures of personal data

Personal data may be disclosed to our insurance partners to enable them to offer you related pet insurance when a pet is adopted through PetRehomer.

2.6 How long we keep personal data

We keep personal data processed for marketing purposes for so long as we believe the person or the organisation they represent may be interested in receiving our products and services.

3. ACCEPTING A CUSTOMER

3.1 The basis on which we process personal data

Where we are asked to provide our products and services, there are preliminary steps we take for the purpose of entering into the contract with our customer.

3.2 Types of personal data

In all cases we collect the following information (where necessary):

3.2.1 The name of our customer or the organisation that the person represents, and their contact details.

3.2.2 Details about the users of PetRehomer, specifically the adopters and rehomerers relating to the adoption and rehoming of pets.

3.3 Categories of individual

3.3.1 Individuals who purchase or use our products and services.

3.3.2 Directors, officers, employees, and other representatives of a customer and its shareholders.

3.4 Sources of personal data

3.4.1 The individual concerned.

3.4.2 Our customer's colleagues.

3.5 Disclosures of personal data

In most cases, the acceptance of a customer is a formality, and we don't disclose the information we obtain to anyone else except in the course of providing our products and services (see section 4 (*Dealing with a customer*)).

3.6 How long we keep personal data

We keep all information for as long we need to do so in relation to provide our products and services, and afterwards in accordance with our policy on record keeping and accounts (see section 7 (*Keeping records and accounts*)).

4. DEALING WITH A CUSTOMER

4.1 The bases on which we process data

Once a customer has entered into a contract with us, we are able to supply our products and services and process personal data about them for the purpose.

4.2 Types of personal data

The nature of the information we need to provide our products and services is reflected in the questions we ask in correspondence and email, collect on-line, or when meeting you or others in person or speaking on the telephone. However, we do not collect information for which we do not have a reasonable need to supply our products and services.

4.3 Categories of individual

4.3.1 Individuals who purchase or use our products and services.

4.3.2 Directors, officers, employees, and other representatives of a customer and its shareholders.

4.4 Sources of personal data

We collect information from the PetRehomer platform/website.

4.5 Disclosures of personal data

We disclose personal data where and to the extent reasonably required in the course of providing our products and services.

4.6 How long we keep your personal data

We keep personal data relating to customers only where and for so long as it is necessary to provide our products and services and afterwards in accordance with our policy on record keeping (see section 7 (*Keeping records and accounts*)).

5. PROCESSING INFORMATION ABOUT OTHERS WHEN DEALING WITH A CUSTOMER

5.1 The basis on which we process personal data

It is in the legitimate interests of our business to process personal data relating to people other than our customers where necessary to supply our products and services.

5.2 Types of personal data

The nature of the information we need to provide our products and services is reflected in the questions we ask in correspondence and email, collect on-line, or when meeting you or others in person or speaking on the telephone. However, we do not collect information for which we do not have a reasonable need to supply our products and services.

5.3 **Categories of individual**

Officers, employees, agents, contractors, shareholders, suppliers, and any other third party relevant to our business.

5.4 **Sources of personal data**

We may collect information from third party organisations that undertake adopters home checks.

5.5 **Disclosures of personal data**

We may disclose information to our customers about an adopter's suitability to adopt a pet.

5.6 **How long we keep personal data**

We keep personal data only where and for so long as it is necessary to provide our products and services and afterwards in accordance with our policy on record keeping (see section 7 (*Keeping records and accounts*)).

6. **DEALING WITH OTHERS**

6.1 The legal basis on which we deal with people who are not customers or associated with the supply of our goods and services depends on the circumstances. In all cases we make sure that we have a legitimate reason to do so in connection with our business.

6.2 We communicate and deal with all manner of people, including suppliers and competent authorities. In the course of doing so, having regard to the nature and purpose of those dealings, we will obtain and process personal data. We do not use the data for any purpose other than for which it was given to us.

6.3 In some situations, we report matters to law enforcement agencies, including the police, for the prevention and detection of crime.

7. **KEEPING RECORDS AND ACCOUNTS**

7.1 **The basis on which we process data**

We have a legitimate interest to keep all records relating to our business for our internal and compliance purposes and to deal with queries, complaints, or claims which may arise.

7.2 **How long we keep your personal data**

We keep personal data only where and for so long as it is necessary to provide our products and services and to conduct our business, and afterwards for so long as necessary to meet our legal or regulatory obligations and in relation to claims which could be made against us. Our normal practice is to keep information for at least 7 years.

8. OPERATING OUR BUSINESS

8.1 Scope of this section

This section is concerned with the systems we use to process personal data and our processing of personal data for internal purposes. It is not concerned with the type of data, the categories of individual on whom we process data, the classes of data, the sources and disclosures of data, nor the period of time which we hold data. For information on those topics, please consult the purpose for which we process the data in the question.

8.2 Operating systems and networks

We process personal data using the following principal systems:

PetRehomer platform/website, Umbraco, Jotform, Mailchimp.

8.3 Cookies

Our cookie policy can be viewed at www.petrehome.org

9. YOUR RIGHTS

You have several rights under data protection law in relation to how we process your information. These are identified below. More information can be obtained from the Information Commissioner's website at [www.https://ico.org.uk](https://ico.org.uk)

9.1 No charge

We cannot charge for providing you with information when you exercise your rights, except that we may charge a reasonable fee based on our administrative costs to provide you with additional copies where requested in connection with a request to access your data, or where we can demonstrate that your requests are manifestly unfounded or excessive. In the latter case, we may alternatively refuse to act on your request.

9.2 To be informed

You have the right to know what personal data we process and to be provided with access to the information, subject to the need to protect the interests of others as appropriate. If you wish to receive a copy of the personal information we hold on you, you may make a subject access request.

9.3 Request that your personal information be rectified

If your personal data are inaccurate or incomplete, you can require that they are corrected.

9.4 Erasure

You can ask for your information to be deleted or removed if there is not a compelling reason for us to retain it.

9.5 **Restrict processing**

You can ask to block or suppress the processing of your personal data for certain reasons. This means that we are still permitted to keep your information but only to ensure we do not use it in the future for those reasons you have restricted.

9.6 **Data portability**

You are entitled to a copy of your personal data for your own purposes to use across different products and services. In certain circumstances, you may move, copy, or transfer the personal information we hold to another company in a safe and secure way.

9.7 **Data breaches**

If we are subject to a breach of security which is likely to result in a high risk to individuals about whom we hold data, we must communicate the breach to the individuals concerned without undue delay. In some cases, this may be done by public communications. This right is subject to certain exceptions where measures have been taken to protect the information.

9.8 **Objecting and withdrawing consent to processing**

9.8.1 You can object to our processing your personal data where it is based on our legitimate interests, in which case we can no longer process the personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

9.8.2 You can object to our use of personal data relating to you for our direct marketing.

9.8.3 Where we process personal data with your consent, you can withdraw it at any time.

10. **CONTACT INFORMATION AND COMPLAINTS**

10.1 If you have any questions about this policy, the personal data we will obtain and process about you, or you wish to complain about our handling of personal data relating to you, please email us at info@petrehomer.org.

10.2 If we are unable to resolve your complaint to your satisfaction, you could refer the matter to the Information Commissioner's Office. Here is a link to the website, [www.https://ico.org.uk](https://ico.org.uk). You may even have a claim in the courts.

31 May 2022