

# PRIVACY STATEMENT

## INTRODUCTION

The Canine Concierge Group Ltd places the highest priority on safeguarding your personal data. This Privacy Statement clarifies our procedures and justifications for processing the details gathered during your interaction with our Platform or Concierge Services.

Your continued engagement with us, or with the carefully selected external partners we coordinate, serves as your active consent to this data policy.

ACCEPTANCE OF THESE DATA PRACTICES IS A MANDATORY CONDITION OF MEMBERSHIP. IF YOU WISH TO DECLINE OUR METHODS OF DATA COLLECTION AND USAGE, WE RESPECTFULLY REQUIRE THAT YOU DO NOT ENGAGE THE SERVICES OF THE CANINE CONCIERGE GROUP.

## 1. HOW WE COLLECT YOUR DATA

a) We gather and process the following categories of information strictly in accordance with UK data protection laws: i) Initial Contact Data: Information supplied when you first engage with our services, such as your home address, email address, and telephone number, which we require to validate your registration and manage account security. ii) Communication Records: Data obtained when you interact with us via online enquiry forms, email, telephone, SMS, or WhatsApp. Please be aware that telephone conversations may be recorded for training, quality assurance, and fraud prevention purposes. These recordings are retained for a strict, limited duration before being automatically deleted, unless we possess a legal obligation or legitimate interest to retain them longer (for example, to investigate a dispute or fraudulent activity). iii) Direct Correspondence Content: Personal details, including your name, email address, and the specific contents of any messages you send to us. This correspondence supplies us with your specific areas of interest. This information is required so we can look to providing a tailored service to you and your dog, as well as formulate an accurate response to your enquiries. iv) Transaction and Instruction History: Comprehensive records of your registration details, ongoing discussions, service instructions, and financial transactions. This includes your stated preferences, billing address, and hashed payment details, indicating whether a transaction was successful or declined. This granular data is mandatory for us to execute our canine concierge services. v) Technical Access Data: Information captured automatically when you navigate our website. This includes your IP address, browser type and version, time zone settings, operating system, and the exact date and time of your visit. We also record site usage metrics, such as the volume of data transferred and the specific pages requested. We gather this technical data primarily to administer, secure, and improve the functionality of our website. vi) Geolocation Data: We may utilise your IP address to ascertain your broad geographical location (such as your city or country) to present you with geographically relevant service information.

b) If you provide us with the personal data of third parties (for example, household staff, family members, or personal assistants), you legally confirm that: (i) you possess the explicit authorisation from those individuals to share their data with us; and (ii) you have informed them of, and they have agreed to, the data practices outlined in this Privacy Statement.

c) We operate under strict regulatory frameworks. Consequently, we may process your personal data independently of your requests if required to ensure our compliance with binding legal obligations imposed by law enforcement agencies or governing regulators.

d) It is your ongoing responsibility to notify us promptly if any of your personal details, or the details concerning your dog, change during the term of your engagement so that our records remain accurate.

e) Should you choose to store your payment card details within our system, we will only ever display the final four digits of your card number when confirming a transaction. The full card number is transmitted securely and directly to the authorised payment processing company to execute the charge.

## 2. HOW WE USE YOUR DATA

a) All personal data processed by The Canine Concierge Group Ltd is handled in strict accordance with applicable UK data protection legislation. We have explicitly outlined our rationale and legal basis for processing your personal and canine data below.

b) The information you provide, or that we collect, may be used for the following purposes: i) To execute our core provisions: To deliver our Concierge Services, permit our external partners to fulfil your requests, administer your membership, and manage our daily operations. This processing is strictly necessary for the performance of our contractual obligations to you and your dog. ii) To provide service updates and recommendations: We may use your data to alert you to service amendments, new offerings, or recommendations that align with your dog's lifestyle. We may reach out via email, telephone, SMS, WhatsApp, or other legally permitted channels. Furthermore, we will only contact you regarding third-party products or services that closely mirror preferences you have previously expressed. iii) To facilitate direct communication: We rely upon our legitimate business interests to process your personal data when responding to your direct enquiries, operational requests, complaints, or general feedback. iv) To administer, preserve, and refine our digital Platform: We deploy "cookies" to evaluate user traffic patterns and website interaction. This data allows us to comprehend how members navigate our site, enabling us to upgrade our design, layout, and functionality. A cookie is a minor data file stored on your device's hard drive, which records your navigational history to present a more personalised experience upon your return. You possess the ability to modify your browser settings to reject cookies or to request notification before a cookie is placed. Please be advised that refusing cookies may impede your ability to utilise specific features of our Platform. For comprehensive guidance on cookie management, please visit: <http://www.allaboutcookies.org>. Processing this data falls under our legitimate interest to maintain and improve our digital infrastructure. v) To issue policy notifications: To formally alert you to any modifications within this Privacy Statement. This is necessary for the ongoing performance of our Services to you. vi) For internal operational requirements: This encompasses IT troubleshooting, data analysis, system testing, research, and statistical profiling. We possess a legitimate interest in processing user data to ensure our internal operations run flawlessly. vii) To ensure system integrity: As part of our efforts to keep our digital environment, payment gateways, and member portals safe. We rely on our legitimate interest to process data to protect our systems against fraudulent or malicious activity. viii) To uphold regulatory compliance: To adhere to any binding legal, statutory, or regulatory obligations imposed upon us by law enforcement agencies, financial regulators, or governing bodies. This processing is strictly necessary for compliance with UK law.

## 3. DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES

a) To execute the Canine Concierge Services effectively, it is imperative that we share your personal data, and that of your dog, with meticulously vetted external entities. This sharing is strictly limited to information necessary for the performance of the contracts you enter into with us or directly with our partners.

b) We may disseminate aggregated, fully anonymised data sets to our industry partners. This statistical information is used exclusively to analyse broader trends in canine travel, premium pet care, and service utilisation, and cannot be traced back to any individual member or their dog.

c) During the provision of our services, your data may be disclosed to the following specific categories: i) Specialist Suppliers: Including, but not limited to, private aviation handlers, premium veterinary practices, and global transport logistics teams required to fulfil your bespoke requests. ii) Internal Infrastructure Providers: Third-party technological and operational platforms that support our daily business functions, such as secure payment processors, database hosting services, and IT support networks. iii) Corporate Restructuring: In the event that The Canine Concierge Group Ltd considers a merger, acquisition, asset sale, or business transfer, your data may be shared with prospective third parties. Should a change of ownership occur, the new governing entity will be legally bound to process your personal data under the exact terms stipulated within this Privacy Statement.

d) Strict Processing Limits: We mandate that all third parties respect the absolute security of your personal data and process it strictly in accordance with UK law. We comprehensively prohibit our third-party service providers from utilising your personal data for their own independent marketing or operational purposes. They are granted access solely to process your information for specified, predetermined purposes, acting strictly upon our explicit instructions.

#### 4. STORAGE AND INTERNATIONAL TRANSFER PROTOCOLS

a) By engaging our Canine Concierge Services, particularly concerning international travel logistics, you acknowledge that your personal data, alongside your dog's travel and medical documentation, must routinely be transferred outside of your home country. This data may be transmitted to jurisdictions where our trusted Suppliers operate to successfully execute your requests.

b) We recognise that these destination countries may operate under data protection regulations that differ from those enforced within the United Kingdom. Whenever we transfer your personal data outside the UK or the European Economic Area (EEA), we ensure a parallel degree of protection is afforded to it by implementing mandatory legal safeguards. This includes the execution of UK-approved Standard Contractual Clauses (SCCs) or International Data Transfer Agreements (IDTAs) with our external Suppliers to guarantee your data remains legally protected to the highest UK standards.

#### 5. DATA SECURITY AND RETENTION PERIODS

a) We have implemented robust, institutional-grade security measures to prevent your personal data from being accidentally lost, compromised, altered, or accessed in an unauthorised manner. We will store your active data for the entire duration of your membership with The Canine Concierge Group.

b) Upon the expiration or formal termination of your membership, we will not immediately erase all files. We are legally obligated to retain specific categories of personal data, financial records, and official correspondence for a subsequent period to satisfy binding statutory, regulatory, tax, and accounting requirements. Once these mandatory legal retention periods expire, your data will be permanently and securely eradicated from our servers.

#### 6. YOUR STATUTORY DATA PROTECTION RIGHTS

a) Subject to current UK data protection legislation, you possess comprehensive legal rights regarding the information we hold about you. You are formally entitled to: i) Request Access: Demand a copy of the personal data we hold about you. ii) Request Rectification: Compel us to correct any incomplete or inaccurate data we hold regarding you or your dog. iii) Request Erasure: Ask us to delete or remove personal data where there is no compelling legal or operational reason for us to continue processing it. iv) Data Portability: Receive your personal data in a structured, commonly used, machine-readable format to transfer to another data controller. v) Object to Processing: Object to our reliance on a legitimate interest for processing, or object to data processing for direct marketing purposes. vi) Protection from Automated Decisions: Refuse to be subject to decisions based solely on automated processing or profiling that may produce a legal or significant effect upon you. vii) Withdraw Consent: Revoke your consent at any time where we are relying explicitly on consent to process your data. viii) Lodge a Formal Complaint: You retain the right to raise a formal grievance with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, should you feel your data has been mishandled.

b) To formally exercise any of the rights detailed above, please direct your correspondence to our Data Protection Officer at [Jacobkersey@thecanineconciergeclub.co.uk](mailto:Jacobkersey@thecanineconciergeclub.co.uk) or send a written request to: Data Protection Officer, The Canine Concierge Group Ltd, 45 Albemarle Street, Mayfair, London, W1S 4JL.

#### 7. EXTERNAL LINKS AND THIRD-PARTY PLATFORMS

a) Our digital correspondence and online Platform may occasionally feature outgoing links to external websites, third-party payment portals, or partner networks. Should you choose to follow a link to any of these external domains, please be explicitly aware that: i) We bear no responsibility for the content, security infrastructure, or technical reliability of external platforms. ii) The inclusion of a link does not constitute a formal endorsement of the views, products, or services offered on that third-party site. iii) We do not guarantee the perpetual availability or functionality of these external links. iv) These independent websites operate under their own distinct privacy policies and terms of service. We accept absolutely no liability or responsibility for how these third parties collect or process your data. We advise you to review their specific privacy frameworks before submitting any personal information to them.