



Privacy Notice

1. Introduction

Wagtails is committed to protecting and respecting your privacy. This privacy notice is designed to provide information about our practices concerning the collection, use and disclosure of your personal information in the course of:

- providing doggy day care services,
- operating Rettendon Dog Park, and
- carrying out associated marketing and recruitment activities.

2. Who are we?

Wagtails is a trading name of Wagtails Group Ltd, a company registered in England (13441498). We are licensed to provide doggy day care services. We also operate Rettendon Dog Park – a dog exercise field open to members of the public.

We are the Data Controller for the purposes of data protection law in relation to any personal information we hold about you. We are registered with the Information Commissioner's Office ('ICO').

Please read this notice carefully. Please contact management@wagtails.co.uk with any questions.

3. Who does this privacy notice apply to?

This privacy notice applies to everyone whose personal information we collect and process (excluding our existing or former workforce, to whom a separate Employee Privacy Notice applies). This includes individuals in the categories below or who work for any of the following:

- Our human customers and prospective customers.
- Our customers' emergency contacts (where applicable).
- Our networking contacts (e.g. dog trainers and fellow dog professionals).
- Our suppliers (including insurers).
- Public authorities (e.g. connected with licensing processes or HMRC).
- Prospective employees.
- Work placement applicants.
- People whose details we process in connection with our marketing activities.

4. What personal data do we collect?

Broadly, personal data, or personal information, means any information about a living individual from which that person can be identified.

For the avoidance of doubt, the data protection legislation does not apply to dogs!

We will need to collect and process various types of personal information for various purposes. Most commonly this will include:

- Contact information for individuals (e.g. full name, address, email address and telephone number).
- Information about your daily routine, but only in so far as necessary for the provision of our doggy day care services (in particular the doggy shuttle service).
- Financial information, including bank account and payment card details.
- Recruitment information, including CVs, employment records, references, proof of eligibility to work in the UK, security checks, photos, interview notes and assessment material, evidence of qualification, identification documents, information relating to driving history.
- Information about individuals employed by, or associated with, our suppliers.
- Marketing and communications data, including your marketing preferences and interests and any feedback you provide to us (for example, by completing a survey). We may also track when you receive and read marketing communications from us.
- Number plate and vehicle information, for monitoring access to our facilities and parking arrangements.

Special category data and conviction offences data is unlikely to be processed except as part of the recruitment process concerning prospective employees and, in such instances, will only be processed where necessary and where we are satisfied that there is a special condition for doing so.

5. How do we collect your personal information?

We use different methods to collect personal information from and about you including:

Direct interactions: you may voluntarily provide us with your personal information, for instance when you:

- Fill out a form on our website, e.g. completing an online enrollment form facilitated by Wordpress.
- Provide us with your payment information, e.g. setting up a Direct Debit or making other payments (facilitated by GoCardless, PayPal and/or Stripe).
- Using our booking system.

- Sign up to our marketing list.
- Correspond with us by email or post or via social media.
- Speak to us in person or on the phone.
- Visit our facilities.
- Give us feedback (for example, by completing a survey).
- Give us your details at an event.
- Send us information in relation to a job application (e.g. a CV or cover letter) or interact with us via recruitment websites such as Indeed.

Automated technologies or interactions: as you interact with our website, we will automatically collect information about your browsing activities and your equipment. We collect this information by using cookies. For full details about our use of cookies, please see our Cookie Notice.

Publicly available sources: we may collect personal information from publicly accessible online sources such as social networking services.

Third party sources: we may collect personal information from third party sources such as our customers, networking contacts or advisers instructed by us.

6. Legal basis on which we will use your personal data

We will only use your personal information where we have a lawful basis for processing. Most commonly, we will use your personal information:

- Where we need to perform the contract we are about to enter into, or have entered into with you, or take any steps you ask us to before entering into a contract with you.
- Where it is necessary to do so to comply with any legal obligations we have, such as in relation to our obligations under our licence or in relation to tax returns.
- On the basis of your consent. Where we rely on your consent for processing this will be brought to your attention when the information is collected from you. You have the right to withdraw consent at any time.
- Where the processing is necessary for our legitimate interests in:
 - o providing doggy day care services.
 - o providing our dog exercise field services, (i.e.) Rettendon Dog Park.
 - o maintaining the requirements of our day care licence.
 - o providing our clients with the best service.
 - o promoting our services.

- o receiving feedback.
- o improving our services and identifying ways to grow our business.

You can obtain further information about how we assess our legitimate interests in respect of specific activities by contacting us.

Special category data

Where we process special category data it is with your explicit consent, where it is necessary to protect your vital interests (for example in the event of an emergency where you are attending our facilities) or where the data has been manifestly made public by you.

7. How do we use your personal information?

Our core services

Where we receive personal data in connection with the provision of our services, that will tend to be for the purposes of providing you with further information about our services, arranging visits to our facilities, taking bookings, arranging use of our doggy shuttle service, taking payment or monitoring compliance with our terms and conditions or site rules..

Business administration

We may use your personal data in connection with complying with our legal obligations or making disclosures to public bodies where in our reasonable opinion the disclosure is appropriate and permitted by law. This includes:

- Disclosures to the licensing authority or other public authority (e.g. HMRC, ICO).
- Providing access to our files for audit or other quality checks.
- Ensuring compliance with banned breeds and dangerous dogs laws.
- Processing required in connection with the day-to-day operation of our business such as billing and payments, record keeping, complaints handling, debt recovery and record keeping. For this we may use third party service providers (e.g. IT service providers, debt collection agencies). Currently, these include: Stripe, Google, Jot Form, GoCardless, PayPal, Microsoft, Webflow, WhatsApp, and common social media platforms.
- Processing required in connection with any actual or proposed reorganisation, merger, sale, joint venture, assignment, transfer or other transaction relating to all or any portion of our business or assets.

Marketing

We process personal information in connection with marketing, including so that we can:

- Share with you news and offers about our products and services.

- Email you with updates and newsletters.
- Ask you for feedback (e.g. in a survey) and to manage, review and act on the feedback.
- Send you invitations to our events, as and when we think they might interest you.
- Register and manage your attendance at one of our events.
- Manage any changes to your marketing preferences or comply with any unsubscribe requests.
- Monitor our website usage and improve our services. Please see our Cookie Notice.

Recruitment

We process personal information in connection with our recruitment practices for the following purposes:

- Recruiting new employees, consultants, and work placement students.
- Verifying immigration status and/or eligibility to work in the UK.
- Undertaking pre-employment checks.
- Obtaining references.

We may undertake recruitment activity via third party websites, such as Facebook and Indeed.

8. Who might we share your information with?

For the purposes set out above, we may share your personal information with the following categories of third parties, including:

- Providers of business support services including technology, banking, insurance and security.
- Analytics and search engine providers that assist us in the improvement and optimisation of our website.
- Providers of business development and marketing support services.
- Survey providers in order to receive feedback and improve our services.

Additionally, we will disclose your personal information to the relevant third party:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data where relevant to the prospective seller or buyer of such business or assets.

- If we are acquired by a third party, in which case personal data about you held by us will be one of the transferred assets; and
- If we are under a duty to disclose or share your personal data in order to comply with any legal or licensing obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, or others.

Where we share your personal information with third parties, as described above, we will only do so where in our reasonable opinion that information will be adequately protected.

Any other service providers with whom we share information are approved by us and subject to contractual obligations designed to ensure that those providers comply with data protection legislation.

Transferring personal information outside the United Kingdom

We may transfer personal data outside the UK where adequate protection measures are in place in compliance with data protection laws. For example, where we are sharing information with third party service providers who operate outside the UK (e.g. IT service providers).

Third party links

Our website and social media pages may include links to third party websites, plug-ins and applications. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

9. How can you change your marketing preferences?

You can opt-out of all communications at any time by 'unsubscribe', or by emailing us at management@wagtails.co.uk.

10. How long we keep hold of your information?

Personal data will be retained for the duration of the commercial relationship and for a further seven years thereafter. This enables us to comply with our licensing obligations in relation to record keeping and with tax and accounting requirements.

If you unsubscribe from our marketing emails or otherwise withdraw your consent for us to contact you, we will store your information to ensure that you no longer receive emails from us. Generally, this will be for a period of two years.

11. How is your information kept secure?

We are committed to data security and take reasonable appropriate steps to protect the personal information we hold from unauthorised access, loss, misuse, alteration or

corruption. We have put in place physical, electronic and managerial procedures to safeguard and secure that information.

12. What are your rights in respect of your data?

If we process your personal data, you have the right:

- To ask us not to process your personal data for marketing purposes.
- To ask us not to process your personal data where it is processed on the basis of legitimate interests provided that there are no compelling reasons for that processing.
- To withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.
- To request from us access to personal data we hold about you.
- To ask for the information we hold about you to be rectified if it is inaccurate or incomplete.
- To ask for data to be erased provided that: the personal data is no longer necessary for the purposes for which it was collected; you withdraw consent (if the lawful basis for processing is consent); you exercise your right to object and there are no overriding legitimate grounds for processing; the data is unlawfully processed; the data needs to be erased to comply with a legal obligation.
- To ask for the processing of that information to be restricted if: the accuracy of that data is contested; the processing is unlawful; the personal data is no longer necessary for the purposes for which it was collected; or you exercise your right to object (pending verification of whether there are legitimate grounds for processing).
- To ask for data portability if the processing is carried out by automated means and the legal basis for processing is consent or contract.

You can exercise these rights at any time by emailing us at managment@wagtails.co.uk.

13. What can you do if you have concerns about our use of data?

Should you have any issues, concerns or problems in relation to your data, or wish to notify us of data which is inaccurate, please let us know by contacting us in the first instance.

If we are unable to resolve your concerns and you remain dissatisfied, you have the right to complain to the ICO.

14. Will there be changes to this notice?

This privacy notice may change from time-to-time, so we recommend that you review it periodically.

Closed Circuit Television (CCTV) Policy.

Key messages

The main objective of this policy is to:

- Inform Wagtails staff and customers of the arrangements for the placement and management of CCTV on our premises.
- Provide information about the retention of CCTV images where Wagtails has responsibility for the systems in use.

Introduction

Wagtails uses CCTV for the purposes of the prevention and detection of crime and civil breaches and in order to recognise and identify individuals with a view to taking appropriate action where necessary.

This policy sets out the accepted use and management of CCTV equipment and images to ensure that Wagtails complies with the Data Protection Act 2018 and other relevant legislation.

Wagtails will also be cognisant of the 12 Guiding Principles of the Surveillance Camera Code of Practice as published by the Home Office in August 2021.

The policy relates to all staff and users of Wagtails premises (including customers and contractors).

Policy position and purpose

CCTV has been installed at Wagtails premises to assist in deterring crime, and also for the prevention and detection of crime. The system is also intended to assist with the identification, apprehension and prosecution of offenders, and the identification of actions that might result in disciplinary action.

The existence and position of CCTV will help to deter any unauthorised access to our premises and, in the event of an incident, help to identify individuals involved.

The purpose of this policy is to establish what CCTV Wagtails will use, how it will be used and managed.

Responsibility for the management of the system

The Director has overall responsibility for the maintenance of the system, and will:

- periodically check the equipment and carry out periodic maintenance checks.
- ensure that images are deleted on an at least monthly basis, unless good reason arises for retention (i.e. an investigation).
- be responsible for access to the recorded images.
- be aware of the data protection compliance requirements in line with the Code of Practice.

The Director will access the CCTV system for the purpose of maintenance and investigation, but will not routinely view, disclose or retain copies of the recorded images.

Auditing the system's operation and working practices

The Director is responsible for:

- ensuring that this policy and its implementation is compliant with Data Protection Legislation, and will audit the system's use on a periodic basis.
- dealing with and responding to any requests for access to images made by individuals under the Data Protection Act 2018.

Access to and disclosure of images

The Director is responsible for viewing images when investigating an incident or suspected incident.

Images may also be accessed by the relevant Manager if necessary as part of a disciplinary investigation or to investigate a breach of our terms and conditions or other infringement. Images may then be disclosed as part of the evidence assembled in the event of a disciplinary hearing or investigation.

Secure storage and retention of images

Images will be stored on the recording equipment which will be securely protected. The Director has responsibility for ensuring that the equipment and the routinely recorded images have the necessary security.

Images are routinely retained for one month, but may be retained longer in the event that they are required as part of an investigation.

Where images have been retained for an investigation, the Director will take responsibility for the secure storage of those images.