



Privacy Policy V1.0.0 – Nov 2023

What is this Privacy Policy for? This privacy policy is for this website pawsome.org.uk and governs the privacy of its users who choose to use it.

The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore, the way this website processes, stores and protects user data and information will also be detailed within this policy.

The Website:

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies with all UK national laws and requirements for user privacy.

Use of Cookies:

This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer/device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer/device.

Cookies are small files saved to the user's computer hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

Users are advised that if they wish to deny the use and saving of cookies from this website onto their computer hard drive they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendors.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information: <https://policies.google.com/privacy>

Other cookies may be stored on your computer hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

Contact & Communication

Users contacting this website and/or its owners do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, as detailed in the Data Protection Act 1998. Every effort has been made to ensure a safe and secure form to email submission process but advise users using such form to email processes that they do so at their own risk.

This website and its owners use any information submitted to provide you with further information about the products/services they offer or to assist you in answering any questions or queries you may have submitted. This includes using your details to subscribe you to any email newsletter program the website operates but only if this was made clear to you and your express permission was granted when submitting any form to the email process. Or whereby you the consumer have previously purchased from or enquired about purchasing from the company a product or service that the email newsletter relates to. This is by no means an entire list of your user rights in regard to receiving email marketing material. Your details are not passed on to any third parties.

Email Newsletter

This website operates an email newsletter program, used to inform subscribers about products and services supplied by this website. Users can subscribe through an online automated process should they wish to do so but do so at their own discretion. Some subscriptions may be manually processed through prior written agreements with the user.

Subscriptions are taken in compliance with UK Spam Laws detailed in the Privacy and Electronic Communications Regulations 2003. All personal details relating to subscriptions are held securely and in accordance with the Data Protection Act 1998. No personal details are passed on to third parties nor shared with companies/people outside of the company that operates this website. Under the Data Protection Act 1998, you may request a copy of personal information held about you by this website's email newsletter program. A small fee will be payable. If you would like a copy of the information held on you please write to the business address at the bottom of this policy.

Email marketing campaigns published by this website or its owners may contain tracking facilities within the actual email. Subscriber activity is tracked and stored in a database for future analysis and evaluation. Such tracked activity may include; the opening of emails, forwarding of emails, the clicking of links within the email content, times, dates and frequency of activity [this is by no far a comprehensive list].

This information is used to refine future email campaigns and supply the user with more relevant content based on their activity.

In compliance with UK Spam Laws and the Privacy and Electronic Communications Regulations 2003 subscribers are given the opportunity to unsubscribe at any time through an automated system. This process is detailed at the footer of each email campaign. If an automated un-subscription system is unavailable clear instructions on how to unsubscribe will be detailed instead.

External Links

Although this website only looks to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website. (External links are clickable text/banner/image links to other websites, similar to; www.google.com)

The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should, therefore, note they click on external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Adverts and Sponsored Links

This website may contain sponsored links and adverts. These will typically be served through our advertising partners, who may have detailed privacy policies relating directly to the adverts they serve.

Clicking on any such adverts will send you to the advertiser's website through a referral program that may use cookies and will track the number of referrals sent from this website. This may include the use of cookies which may, in turn, be saved on your computer hard drive. Users should, therefore, note they click on sponsored external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

Social Media Platforms

Communication, engagement and actions taken through external social media platforms that this website and its owners participate in are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate/engage upon them with due care and caution in regard to their own privacy and personal details. This website nor its owners will ever ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

This website may use social sharing buttons that help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

Shortened Links in Social Media

This website and its owners through their social media platform accounts may share web links to relevant web pages. By default, some social media platforms shorten lengthy URLs [web addresses] (this is an example: <http://bit.ly/zyVUBo>).

Users are advised to take caution and good judgement before clicking any shortened URLs published on social media platforms by this website and its owners. Despite the best efforts to ensure only genuine URLs are published, many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

Data Protection Policy

Pawsome Management Limited is committed to protecting your privacy. This data protection policy (hereinafter: "Privacy Policy") governs the processing of your personal data as part of your visit to our website (hereinafter: "Website"), your communication with us via e-mail telephone, and social media (hereinafter: "Social Media Channels"; e.g. Facebook, LinkedIn and Twitter,).

1. In general

1.1. Your personal data is processed by Pawsome Management Limited, 105 The Avenue, Fareham, Hampshire, PO14 3DJ, Registration number: 14999253 (hereinafter: "Pawsome Management Ltd", "we", "us", "our"). You can contact us via email at gdpr@pawsome.org.uk

1.2. Any notion starting with a capital shall be defined by explicit reference in this Privacy Policy. Where possible given the context, singular words shall be interpreted as also including the plural and vice versa.

1.3. Where reference is made to certain laws or regulations, such reference shall also include any change, replacement or annulment of said laws or regulations, including any related executive decisions.

1.4. Pawsome Management Limited reserves the right to modify, change or amend the Privacy Policy at our own discretion and from time to time. Such modification, change or amendment shall be communicated via the Website. If you do not accept the modifications, changes or amendments, you are to inform us by sending an e-mail to rapido@pawsome.org.uk If we do not receive such an e-mail from you within three (3) business days after the changes to the Privacy Policy have been announced on our Website, you will be deemed to have accepted unambiguously all such changes.

2. Types of personal data we process

2.1. Whenever you use our Website or Social Media Channels, we collect:

- Technical information associated with the device you use, such as your IP address, browser type, geographical location and operating system;
- Information concerning your browsing behaviour, such as how long you visit, what links you click on, what pages you visit and how many times you visit a page.

2.2. When you contact us via email, telephone, or Social Media Channels, we collect:

- The basic identity information you provide us with, such as name, e-mail address, postal address, telephone number, the company you work for, your function;
- The content of your communication and the technical details of the communication itself, such as with whom you correspond at our end, and the date and time;

- Any other personal data you choose to provide us with.

3. Purposes for processing

3.1. We process your personal data to provide you in a personalised and efficient way with the information, products and services you request via the Website, e-mail, telephone, and Social Media Channels.

3.2. We process your personal data for marketing purposes, i.e. to provide you with targeted communications, promotions, offerings and other advertisements of Pawsome Management Limited.

3.3. We process your personal data to comply with legal obligations or to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies or bodies, including competent data protection authorities.

Your personal data may be transferred upon Pawsome Management Limited's own initiative to the police or the judicial authorities as evidence or if there are justified suspicions of an unlawful act or crime committed by you through your registration with or use of the Website, our Social Media Channels or other communication with us.

3.4. We may process your personal data for the preservation of the legitimate interests of Pawsome Management Limited, use of the Website, Social Media Channels or other communication channels can be considered (a) a violation of any applicable terms of use or the intellectual property rights or any other right of a third party, (b) a threat to the security or integrity of the Website, Social Media Channels or other communication channels, (c) a danger to the Website, Social Media Channels or other communication channels or any of Pawsome Management Limited's or our subcontractors' underlying systems due to viruses, Trojan horses, spyware, malware or any other form of malicious code, or (d) in any way hateful, obscene, discriminating, racist, slanderous, spiteful, hurtful or in some other way inappropriate or illegal.

4. Legal basis for processing your personal data

4.1. The processing of your personal data for the purposes outlined in clause 3.3 is necessary to allow Pawsome Management Limited to comply with our legal obligations.

4.2. The processing of your personal data for the purposes outlined in clauses 3.1, and 3.4 is necessary for the purpose of the legitimate interests of Pawsome Management Limited, which are:

- Continuous improvements to Pawsome Management Limited's Website, Social Media Channels, products and services to ensure that you have the best experience possible;
- Keeping our Website, Social Media Channels, products and services safe from misuse and illegal activity;

- Marketing and promotion of our products, services, brands and overall successful commercialisation of our products and services.

5. Recipients

5.1. We do not send your personal data in an identifiable manner to any third party without your explicit permission to do so. You understand, however, that if you use our Social Media Channels, your personal data is also processed by the social media providers.

5.2. We rely on third-party processors to provide you with the Website as well as to process your personal data on our behalf. These third-party processors are only allowed to process your personal data on behalf of Pawsome Management Limited upon the explicit written instruction of Pawsome Management Limited. Pawsome Management Limited warrants that all third-party processors are selected with due care and are obliged to observe the safety and integrity of your personal data.

5.3. We may share your personal data with other entities within the Pawsome Management Limited group of companies. However, we will ensure that all Pawsome Management Limited group entities will take due care that all processing of your personal data is in line with what is set out in this Privacy Policy.

6. Location and transfer

6.1. We process your personal data first and foremost within the EEA. However, in order to process your personal data for the purposes outlined in clause 3 above, we may also transfer your personal data to other entities within the Pawsome Management Limited group or to third parties who process on our behalf which are located outside the EEA. Each entity outside the EEA that processes your personal data shall be bound to observe adequate safeguards with regard to the processing of your personal data. Such safeguards will be the consequence of:

- The recipient country has legislation in place which may be considered equivalent to the protection offered within the EEA; or
- A contractual arrangement between Pawsome Management Limited and that entity. All Pawsome Management Limited entities are parties to a contractual arrangement based on the EC's Standard Contractual Clauses (controller-to-controller) (Commission Decision C (2004)5721.

6.2. We may transfer anonymised and/or aggregated data to organisations outside of the EEA. Should such transfer take place, Pawsome Management Limited will ensure that there are safeguards in place to ensure the safety and integrity of your data as well as all rights with respect to personal data you might enjoy under applicable mandatory law.

7. Quality assurances

7.1. We do our utmost best to process only those personal data which are necessary to achieve the purposes listed under clause 3.

7.2. Your personal data are only processed for as long as needed to achieve the purposes listed under clause 3 of this Privacy Policy or up until such time where you withdraw your consent for processing them. Note that withdrawal of consent may imply that you can no longer use the whole or part of the Website, Social Media Channels and other communication channels. We will de-identify your personal data when they are no longer necessary for the purposes outlined in clause 3, unless there is:

- An overriding interest of Pawsome Management Limited, or any other third party in keeping your personal data identifiable;
- A legal or regulatory obligation or a judicial or administrative order that prevents Pawsome Management Limited from de-identifying them.

7.3. You understand that an essential aspect of our marketing efforts pertains to making our marketing materials more relevant to you. This means that we build a profile of you based on relevant characteristics as outlined in clause 2.

7.4. We will take the appropriate technical and organisational measures to keep your personal data safe from unauthorised access or theft as well as accidental loss, tampering or destruction. Access by personnel of Pawsome Management Limited or our third-party processors will only be on a need-to-know basis and subject to strict confidentiality obligations. You understand, however, that safety and security are best efforts obligations that can never be guaranteed.

8. Your rights

8.1. You have the right to request access to all personal data processed by us pertaining to you. We reserve the right to charge an administrative fee for multiple subsequent requests for access that are clearly submitted for causing nuisance or harm to Pawsome Management Limited.

8.2. You have the right to ask that any personal data pertaining to you that are inaccurate, are corrected free of charge. If a request for correction is submitted, such request shall be accompanied by proof of the flawed nature of the data for which correction is asked.

8.3. You have the right to withdraw your earlier given consent for processing your personal data, in which case clause 8.4 will apply.

8.4. You have the right to request that personal data pertaining to you be deleted if they are no longer required in light of the purposes outlined in clause 3 or if you withdraw your consent for processing them. However, you need to keep in mind that a request for deletion will be evaluated by Pawsome Management Limited against:

- Overriding interests of Pawsome Management Limited;
- Legal or regulatory obligations or administrative or judicial orders which may contradict such deletion.

Instead of deletion, you can also ask that we limit the processing of your personal data if and when (a) you contest the accuracy of that data, (b) the processing is illegitimate or (c) the data are no longer needed for the purposes listed under clause 3 but you need them to defend yourself in judicial proceedings.

8.5. You have the right to oppose the processing of personal data if you are able to prove that there are serious and justified reasons connected with this particular circumstance that warrant such opposition. However, if the intended processing qualifies as direct marketing, you have the right to oppose such processing free of charge and without justification.

8.6. You have the right to receive from us in a structured, commonly used and machine-readable format all personal data you have provided to us.

8.7. If you wish to submit a request to exercise one or more of the rights listed above, you can send an e-mail to gdpr@pawsome.org.uk. An email requesting to exercise a right shall not be construed as consent with the processing of your personal data beyond what is required for handling your request. Such a request should clearly state which right you wish to exercise and the reasons for it if such is required. It should also be dated and signed and accompanied by a digitally scanned copy of your proof of identification e.g. passport, driving licence etc. If you use the contact form, we may ask you for your signed confirmation and proof of identity.

We will promptly inform you of having received this request. If the request proves valid, we shall honour it as soon as reasonably possible and at the latest thirty (30) days after having received the request.

If you have any complaints regarding the processing of your personal data by us, you may always contact our Data Protection Officer (gdpr@pawsome.org.uk) If you remain unsatisfied with our response, you are free to file a complaint with the Information Commissioner's Office – www.ico.org.uk