

# 1. AppleTree Dog Training Privacy Statement

Welcome to the **AppleTree Dog Training** (“AppleTree”, “we”, “us” or “our”) privacy statement.

AppleTree respects your privacy and is committed to protecting your personal data.

This privacy statement explains how we comply with the European Union General Data Protection Regulation (“GDPR”) and will inform you (“you” or “your”) as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please refer to the Glossary to understand the meaning of some of the terms used in this privacy statement.

## **Important information and who we are**

This privacy statement aims to give you information on how AppleTree collects and processes your personal data through your use of this website.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

AppleTree is the controller and responsible for your personal data.

If you have any questions about this privacy statement, including any requests to exercise your legal rights, please contact the us using the details set out below.

## **Contact details**

Our full details are:

Email address: [Privacy@applereedogtraining.co.uk](mailto:Privacy@applereedogtraining.co.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on 20<sup>th</sup> May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. 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 notice of every website you visit.

## 2. How we collect and process personal information

Personally Identifiable Information (PII) means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of PII about you. GDPR requires us to have a sound legal basis for processing your information. The list below, while not exhaustive, shows the main categories of information we may collect:

- **Identity data** includes: first name, last name, maiden name, username or similar identifier, title, marital status, date of birth, gender.
- **Contact data** includes: addresses (home, billing, delivery, email), telephone numbers.
- **Financial data** includes: bank account details, payment card details
- **Transaction data** includes: details of payments to and from you, other details of products and/or services you may have purchased from us.
- **Profile data** includes: username and password if relevant, purchases or orders made by you, your interests, preferences and feedback if provided.
- **Usage data** includes: information about how you use our products and services.
- **Marketing and Communications data** includes: your preferences in receiving marketing from us if requested and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

The table that follows shows the purposes for which PII might be used and the legal basis for doing so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal information for more than one legal basis, depending on the specific purpose for which we are using the information. Please contact us if you need further details about the specific legal basis we are relying on to process your information where more than one basis has been set out in the table.

Purpose of processing / activity	Categories of PII	Legal basis for processing including legitimate interest
To register you as a new customer	Identity Contact	Performance of a contract with you
To respond to questions or comments from you about or products and services	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services, to develop them and grow our business)

To manage our relationship with you which may include: (a) Notifying you about changes to our terms and conditions (b) Provision and improvement of our products and services (c) Sending announcements and communications (d) Processing requests (e) Asking you to leave a review or take a survey	Identity Contact Profile Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Usage	Necessary for our legitimate interests in running our business, provision of administration and IT services, to prevent fraud Necessary to comply with a legal obligation
To deliver relevant website content and information about our products and services to you	Identity Contact Profile Usage Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact Profile Usage Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

### 3. Website visitor tracking and the use of cookies

Our website does not use cookies or any form of tracking software.

We do not therefore have a cookie policy relating to this website.

### 4. Automated decision-making and profiling

Our website is not configured to use any form of profiling or automated decision-making.

### 5. How We Share your Information

We may share your information with third parties that provide services to us or on our behalf, including marketing and other services that help us operate our business.

The categories of company with whom we may share your data include (but are not limited to):

Dog Trainers, Animal food providers, veterinarians

We may also disclose certain personal information as required by law or in connection with a legal claim or proceeding, or as we may reasonably determine to be necessary or appropriate to protect our rights or the rights of others or to avert loss or harm to persons or property.

Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details to send you products/services information through a mailing list system. This is done in accordance with the regulations named in Section 1 above.

## 5. International Transfers

If we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 6. Your Rights

You have the following rights:

- to access your personal information
- The right to edit and update your personal information
- The right to data portability
- The right to request to have your personal information deleted
- The right to withdraw consent at any time
- The right to restrict processing of your personal information
- The right to object
- Rights in relation to automated decision making and profiling
- The right to lodge a complaint with a supervisory authority

### 6.1. The right to access your personal information

You have the right to obtain confirmation that your personal information is being processed including supplementary information such as what personal information we hold, why we are processing it, who we share your personal information with, the expected retention period

and the safeguards regarding transfers to non-EEA countries, subject to the limitations set out in applicable statutes, regulations and other laws.

If you ask, we will provide you with a copy of your personal information free of charge. We may charge a fee to covering our administrative costs if you request further copies of the same information.

## 6.2. The right to edit and update your personal information

We will comply with your request to edit and update incorrect personal information promptly.

## 6.3. The right to data portability

At your request, we will provide you with your personal information in a structured, commonly used and machine readable format if:

- you provided us with personal information;
- the processing of your personal information is based on your consent or required for the performance of a contract; or
- the processing is carried out by automated means.

## 6.4. The right to request to have your personal information deleted

Upon receipt of your request, we will delete your personal information promptly if:

- it is no longer necessary to retain your personal information;
- you withdraw the consent which formed the basis of the processing of your personal information;
- you successfully exercised your right to object to processing (see below)
- we processed your personal information unlawfully; or
- the personal information must be deleted for us to comply with our legal obligations.

In so far as practicable, we will inform any third parties we might have shared your personal information with of your deletion request.

We will decline your request for deletion if processing of your personal information is necessary:

- to comply with our legal obligations;
- in pursuit of a legal action;
- to detect and monitor fraud; or
- for the performance of a task in the public interest.

## 6.5. The right to withdraw consent at any time

If want to withdraw any consent you may have previously given and/or you do not want to receive email from us in the future, please contact us at:  
privacy@appletrreedogtraining.co.uk

## 6.6. The right to restrict processing of your personal information

You have the right to limit the processing of your personal information if:

- you dispute the accuracy of your personal information;
- your personal information was processed unlawfully and you request a limitation on processing, rather than a deletion of your personal information;
- we no longer need to process your personal information, but you need your personal information to establish, exercise or defend a legal claim; or
- you objected to processing based on our legitimate interest and we are in the process of determining whether our legitimate interest grounds for said processing override your rights and freedoms.

Please note that we may continue to store your EU Personal Data to the extent required to ensure that your request to limit the processing is respected in the future.

## 6.7. The right to object

You have the right to object to the processing of your personal information for marketing and research purposes (including profiling). You have the right to object from the very first communication from us and every marketing communication we send after. We will stop any marketing related processing of your personal information as soon as we receive your request.

Where we process your personal information based upon our legitimate interest [(or that of a third party)], then you have the right to object to this processing on grounds relating to your particular situation if you feel it impacts on your fundamental rights and freedoms. We will comply with your request unless we have compelling legitimate grounds for the processing which override your rights and freedoms, or where the processing is in connection with the establishment, exercise or defence of legal claims.

## 6.8. Your rights in relation to automated decision making and profiling

You have the right not to be subject to decisions that are based solely on automated processing (including profiling) if they would produce legal effects or a similarly significant effect on you, unless you gave us your explicit consent or where they are necessary for a contract with us.

## 6.9. The right to lodge a complaint with a supervisory authority

If you wish to complain or seek advice from a supervisory authority, please contact:

Information Governance department  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow

Cheshire  
SK9 5AF  
Tel: +0303 123 1113.

Website: [www.ico.org.uk](http://www.ico.org.uk)

You can read more about your rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

In order to exercise any of your rights above please email us at [privacy@applereedogtraining.co.uk](mailto:privacy@applereedogtraining.co.uk). We will respond to your written request within 30 days. Unless stated otherwise, we will not charge you any fee in connection with the exercise of your rights.

## 8. How We Protect the Information

We take reasonable steps to implement and maintain suitable security measures for any personal information we collect. Access to your personal information is also limited by technical means to those employees, agents and contractors who have an authorised business need to know. All our employees receive appropriate training on Information Security and Data Protection and are subject to non-disclosure agreements (NDAs).

We have put in place procedures to deal with any actual or suspected breach of personal information and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. Social Media Policy & Usage

We adopt a Social Media Policy to ensure our business and our staff conduct themselves accordingly online. While we may have official profiles on social media platforms Users are advised to verify authenticity of such profiles before engaging with, or sharing information with such profiles. We will never ask for user passwords or personal details on social media platforms. Users are requested to conduct themselves appropriately when engaging with us on social media.

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page.

## 11. Third Party Websites

This Privacy Statement applies only to the Site and does not apply to websites that are linked to the Site and not operated by or on behalf of us. Links to third-party web sites are provided solely as a convenience to you. All content accessed via links to outside websites belongs to the respective owners of those websites and content and services available via or provided to such websites are governed by the terms and conditions or privacy policies of those websites. When you leave our website, we encourage you to read the privacy statement of every website you visit.

## 12. Our retention policy

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.