

# Data Privacy and Security Policy

## 1. Introduction

Pets As Therapy values and respects the choice you make to support our work to help children and adults who benefit from volunteer and animal companionship. This Privacy Policy sets out how we use any information that you share with the Charity and how we protect your privacy.

By using our website, social media pages, entering a competition or providing your information to the Charity you consent to our collection and use of the information in the ways set out in this policy.

This policy covers Pets As Therapy (PAT) the Charity and the Company and any known associate entities.

This registered Charity (also registered as a Company) is wholly owned and controlled by Pets As Therapy. The Trustees, Directors, Staff and Volunteers are supported by 'head office' functions and subcontracted suppliers of marketing, legal and human resources services.

## 2. Legal Information

The full legal entity is:

Pets As Therapy Registered Charity 1112194  
Registered Charity Scotland sco38910  
Company Limited by Guarantee, registered in England 5311186  
Registered with the Information Commissioners Office (ICO)

**Registered office address:** Pets As Therapy, 59 Monument Business Park, Warpsgrove Lane, Chalgrove, Oxford OX44 7RW

**Tel** 01865 671440 / **Email** [reception@petsastherapy.org](mailto:reception@petsastherapy.org) / [www.petsastherapy.org](http://www.petsastherapy.org)

Pets As Therapy is not a 'public authority' as defined under the Freedom of Information Act and we will not therefore respond to requests for information made under this Act. Using the funds from our supporters for such activities is not in accordance with our charitable purposes.

### 2.1 Who are 'We, Us, Our'?

In this policy whenever you see the words 'we', 'us' or 'our', it refers to Pets As Therapy.

## **2.2 Your acceptance of this policy and our right to change it:**

- By using our websites, social media pages, entering a competition or providing your information you consent to our collection and use of the information you provide in the way(s) set out in this policy, for the purposes that the information was given or collected. If you do not agree to this policy please do not use our website, social media pages or services.
- We may make changes to this policy from time to time. If we do so, we will post the changes on this page and they will apply from the time at which we post them.

This policy was last updated on 8 May 2018.

## **3. What is personal data?**

Personal data is information that can be used to identify an individual, such as: name, address, phone number or email address.

## **4. The Policy in Summary**

It is important to consider the full policy to understand what information we hold, how we may use it, and what your rights are – in summary:

- We collect personal data (as outlined above) or non-personal data (such as IP addresses, pages accessed on our website etc.)
- We collect information about the people we assist (beneficiaries), volunteers, supporters, donors and employees.
- We collect and process information to provide our services or goods, to provide information, to fundraise and gain support for our public benefit work, for administration, research and for the prevention and detection of crime.
- We only collect the information that we need or that is useful to us to provide the best possible service.
- We will only collect and use the minimum amount of data for the above purpose.
- In certain instances we will collect and use your personal information relying on the legitimate interest legal basis set out in the General Data Protection Regulations (GDPR) 2018.
- We will do our utmost to keep all personal information secure wherever and however collected. We will never sell your data or share it with another company or charity for marketing purposes.
- We will only share data where we are required to by law or with carefully selected partners who work for us.
- All our partners are contractually required to treat your data as carefully as we would, to only use it as instructed by us, and to allow us to check that they do this.
- Our website uses cookies.

These are the basics; the full Data Privacy and Security Policy is below.

## **5. Data Privacy and Security Policy in full.**

This policy applies to our website, our use of emails and text messages for marketing purposes, and any other methods we use for collecting information. It covers what we collect and why, what we do with the information, what we won't do with the information and what rights you have.

## 6. What information do we collect and why?

We will only collect the information that we need.

- From our website we collect non-personal information such as IP addresses (the location of the computer on the internet), pages accessed, and files downloaded. This helps to measure how many people use our site, how often and how popular our pages are. This information does not tell us anything about who you are or where you live. It simply allows us to monitor and improve our website for users.
- From volunteers, supporters, assessors, volunteer co-ordinators we collect personal information including name, postal address, phone number, email address, date of birth (where appropriate), Gift Aid details, contact preferences, information bank or credit card details, direct debit details if applicable. If you are applying to become a volunteer we ask for details about your pet, for references and for a picture of you and a picture of your pet needed to process your application.
- We may also collect information which you give to us indirectly, for example, if you are using websites such as Just Giving or Virgin Money Giving to fundraise for us, such websites have their own Privacy Policies which you should check when you provide your data.
- We may also use data which you provide to other organisations and that you give us your permission to share. This includes social media sites such as Facebook and Twitter.
- We will collect information when you volunteer it through specific activities, such as newsletter requests, registration for events, product purchases, feedback, donations, competition entries etc. This information is needed to fulfil your requests. You don't have to disclose any of this information to browse our website.

## 7. What we do with the information?

We will use the information you provide to:

- Fulfil your requests – such as applications for services, donations, competition entries, participation in campaigns and provision of PAT information or opportunities to volunteer or work for Pets As Therapy.
- Process sales transactions, donations or other payments and verify financial transactions.
- Handle orders, deliver products and communicate with you about orders.
- Prevent or detect fraud or abuse of our website and enable third parties to carry out technical, logistical and other functions on our behalf.
- Carry out anonymised analysis on the demographics behaviour of our website users and of our supporters and recipient establishments to help us gain a better understanding of them and to enable us to improve our service. This research may be carried out internally by our employees or subcontracted to experts.
- Communicate with our supporters or customers.
- If you have agreed to it, provide you with information we think may be of interest to you.

## Consent

As part of joining PAT as a volunteer or Establishment, we will ask for your consent to our processing your data for the purposes we will describe, to facilitate your membership.

We will only send direct fundraising information to you with your prior consent.

We will ask for your consent to the communications channels you prefer us to use.

You may withdraw your consent at any time by contacting our team on 01865 671440 or by emailing [reception@petsastherapy.org](mailto:reception@petsastherapy.org). Office hours are 9am to 4.30pm, Monday to Friday.

If you receive our regular Newsletter, you may unsubscribe at any time.

## **8. Sharing your information.**

**We will only share your information if:**

- We are legally required to do so, e.g. by a law enforcement agency or required to by a Court order.
- We believe it is necessary to protect or defend our rights, property or the personal safety of our people, our volunteers or their pets or a therapy recipient or establishment.
- We are working with a secure partner or contractor carrying out work or processing data on our behalf.

**We will only pass personal data to partner contractors if they have signed a contract with us that requires them to:**

- Comply with the requirements of the Data Protection Act 1998 and GDPR 2018.
- Treat your information as we do.
- Only use the information for the purposes it was supplied.
- Allow us to carry out checks to ensure they are doing all these things.

## **9. Storing your Information**

All our data is stored and processed securely inside the European Economic Area.

If we transfer data to any third party processor, their processing and data storage will also be in the EEA. We may also store information on paper.

We have security measures in place to protect against the loss, misuse or alteration of data whilst it is under our control.

The transmission of data across the internet cannot be guaranteed secure. We do our best to protect the security of your information but we cannot guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

We will keep your information only for as long as we need it to provide you with the goods, services or information you have requested, to administer your relationship with us, to comply with the law, or to ensure we do not communicate with people who have asked us not to.

We will always dispose of data securely, in-house or using specialist companies and processes.

## **10. What we don't do with your information**

We do not sell or share details of our volunteers, supporters, recipients or establishments to or with any other organisations to use for their own purposes.

## **11. Your rights**

The Data Protection Act 1998 and GDPR 2018 give you rights over your data:

- the right to have inaccurate personal data corrected.
- the right to have your personal data erased or destroyed.
- the right to prevent your data being sold to or shared with unrelated third parties without your consent.
- the right to a copy of the information we hold about you (known as a data subject request).
- you have the right to ask us to stop processing your personal data. Please note that if we do so, it may mean we can no longer accredit you as a visiting Pets As Therapy volunteer.

To exercise any of these rights, call us on 01865 671440 or emailing us on [reception@petsastherapy.org](mailto:reception@petsastherapy.org). We may ask callers to put their request in writing and verify their identity.