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Privacy Policy

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17/03/2025	1.0	New Template, New		
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Dependencies	Version	Name		
_	Number			
15/01/2025	1.0	Cookie Policy		

Purpose

The purpose of this policy is to be as transparent as possible with regards to the data we collect and hold about you and how we may use it and how we keep it safe.

Scope/Introduction

How we respect privacy when we deal with personal information collected by our organisation.

RSPCA Branches are separately registered, volunteer run charities using a <u>governing document</u> approved by the national RSPCA. Our branch will respect your privacy and are committed to protecting your personal data. Barney & Bella will be trading under the RSPCA Woodside trading company which is owned by RSPCA Woodside.

This notice will tell you in general terms how the RSPCA [Leicestershire, Peterborough and Rutland branch (the Branch) charity registered number 222621 and Barney & Bella will treat the information it collects about individuals who interact with it. Please read this privacy notice together with any other information that we may provide on specific occasions when we ask to collect or process your personal data so that you are fully aware of how and why we are using it.

This privacy notice supplements any other specific notices provided by the Branch and is not intended to override them.

1. Data we collect

The following explains the types of data we collect and the legal basis for processing it under current data protection legislation.



If you enquire about our branch and our work, or wish to make a complaint, we will take your name, telephone contact number, email or postal address and a message. The legal basis for this may be to fulfil a contract with you (e.g. to be considered for adoption of an animal) or legitimate interest (it is necessary for us to read and store your message so that we can respond in the way you would expect). We may have a legitimate interest in sharing some of your personal data with the RSPCA National Society, who support branches in governance and administration, including complaint handling.

If you wish to receive updates by email or post about our work, including fundraising updates

We will take your name, email or postal address and a contact number. The legal basis for this is consent - you will need to have given us your active consent to be contacted in this way about the subject selected and can rescind this at any time. Further information will be given at the point we collect your data.

If you make a donation to the charity, we will request your name, email address and postal address. If we take payments over the phone where we ask for your credit or debit card details, we will not keep your financial information but process immediately. We prefer you to donate through your bank or via a third-party processor (e.g PayPal or JustGiving) who are data controllers in their own right. We may thank you for your donation on the basis of legitimate interest - this is necessary for us to fulfil your intention of receiving your donation and your expectation of receiving an acknowledgement.

We may collect the following personal data:

- Personal Identification Information: Name, address, phone number, email address.
- **Pet Information**: Pet's name, species, breed, age, medical history.
- Payment Information: Billing address, payment card details.
- Appointment History: Dates and details of previous visits.

Social media Whilst we try our best to only link to reputable social media platforms, we cannot be held responsible for the privacy of information collected by sites not managed by us, nor can we accept responsibility or liability for them. For this reason, you should consult the privacy policy on any external platform you link to before you submit any personal information to those sites.

Contact Forms Our website may request personally identifiable information through contact forms. When completing these forms, you will be asked to consent to our data processing policy as outlined in this document. Generally once submitted, your information will be processed and forwarded to us via a single email generated by the website application.



If you ask RSPCA Woodside to rehome your animal we will take your name, address, email and contact numbers and any history relevant to the animal's welfare and behaviours, including veterinary information. The legal basis for this is performance of a contract with you to acquire the full legal title of the animal and to seek to rehome it. We may seek your consent to contact your previous vet to obtain a veterinary history.

If you report an animal as lost or found, we will not take your details directly but refer you to Animal Search UK.

If we register or amend microchip details on an animal belonging to you, we will ask you for your name, address, email and contact numbers in order to pass to the relevant microchip database company (principally Identibase, Anibase, Petlog). The legal basis for this is performance of a contract between you and the microchip company so that if your pet is missing, you can be reunited. For cats and dogs microchipping is also a legal obligation.

If we scan a stray animal and locate a microchip, we will contact the microchip database company and follow their process to contact you to let you know we've found your pet. The legal basis for this is our legitimate interest as an animal welfare organisation in matching stray animals with owners. If, after taking all reasonable steps to trace an owner, we are unable to make contact, we will seek to rehome the animal and re-register the microchip accordingly.

To register your interest in volunteering or applying for a job we will collect your name, address, email and contact telephone numbers and ask you for details regarding your application. Sometimes, criminal records and other checks may be required in line with our safeguarding and legal obligations. In processing your application, we may collect special category data, in particular about any disability, and we will only process this information on the basis of your explicit consent and specifically for the purpose of ensuring we meet our legal obligations (e.g. to make reasonable adjustments). We may also seek references who will need to consent to being contacted by the Branch. Next of kin details will also be requested if your application is successful, as part of our legal responsibility for your safety whilst with us. Occasionally we need to contact a third party if concerned about your vital interests (e.g. in a medical emergency). We may also have a legitimate interest in sharing some of your personal data with the National RSPCA, who support branches in governance and administration, including recruitment of staff and volunteers.

We have installed CCTV systems at some of our premises and at our rehoming centre based in Leicester we have installed CCTV on the outside of our buildings for the purposes of our legitimate interest in crime prevention and detection. CCTV is installed on the outside of any block associated with rehoming a pet for the purpose of monitoring the security of our people and property. Images captured by CCTV will not be kept for longer than necessary however, on occasions, there may be a reason to keep images for longer (e.g. if a crime is being



investigated). You have the right to access CCTV images of yourself. Signage advising of CCTV equipment will give notice of areas covered by CCTV

We may use images of you and/or your pet in relation to promoting our charitable activities or fundraising. Please note that we (or our authorised partners) may film or photograph participants, volunteers and spectators attending or taking part in our events and use such footage or photographs. We do this in order to publicise our work in advertising, publications, marketing material, social media, personalised direct mail and other media that may be made available to the public.

No personal details (including names) of any under 16-year-olds will be used in any publicity materials without their written consent or that of their parent or legal guardian (depending on their age), but we may use images where children are incidentally included (for example, images of mass participation) but will give older children, or their parents/guardians, the opportunity to opt out.

We would ideally like to obtain your explicit consent before processing any images that would identify you directly (such as photos of you in a small group) but in mass participation events where this is not practical, we would ask you to contact the branch or its photographers, who should be easy to identify, in order to opt out.

Some individuals who adopted through us choose to share their experiences to support and promote our work. We will only share such stories if we have obtained explicit and informed consent from the individual or, if they are under 18, from their parent or guardian. These stories may be featured publicly at events, in materials promoting our campaigns and fundraising efforts, or in documents such as our annual report.

Providing your personal information is entirely voluntary; there is no legal or contractual obligation to do so. However, we require the information mentioned above to engage with you effectively as a patient or supporter.

We do display images of animals that have been adopted and in the majority of cases this will not be considered as personal data. However, as an adopter of an animal, you can always request at adoption that their image is not used, or that it is removed from the branch's channels at any time.

If you participate in a fundraising event that we have organised such as annual fundraising event, dog show, raffle, competition or prize draw etc we may take your name and contact telephone number in order to administer the event. The legal basis for this is performance of a contract with you.

If you use our website, your website activity will be collected through cookies, in line with our <u>cookie policy</u>. Further details about our use of cookies are detailed below in section 6.

Accidents If you have an accident at the centre, or at any of our charity shops, we will need to collect your name, address and telephone number as part of our accident recording and reporting procedure.



We may share your details with the emergency services, if they are called. The Health and Safety Executive (HSE) government department if your accident falls under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013). Please visit http://www.hse.gov.uk/privacy.htm for details on how HSE handles your data.

2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the information at the top of this policy.

For example, we may use your personal information to:

- To contact you in response to your enquiry, or to address questions, suggestions, issues, or complaints you've raised.
- handle donations or other transactions that you initiate, including processing Gift Aid or issuing refunds.
- To provide you with our products and services
- To comply with charity law and other legal regulations
- where you have specifically agreed to this, send you marketing communications by email or post relating to our work which we think may be of interest to you.

Under the legitimate interests legal basis, we may use your data to:

- Personalise your shopping experience, such as recommending products based on your previous purchases or enquiries.
- Conduct statistical analysis and gather feedback on our products, services, and activities. For instance, we
 may invite you to review a product or service you've used. Trusted research and feedback providers may
 assist us with this process.
- Support our security measures, ensuring you can access our website and mobile apps safely.
- Better understand your preferences as a customer, allowing us to improve the products and services we provide.
- Inform you about the impact of your support and seek further financial or non-financial assistance.
- Deliver tailored online advertising and promotions.
- Analyse and segment data to identify trends, preferences, and relevant information for our supporters, allowing us to target communications effectively.



Any analysis or profiling is conducted internally or through trusted suppliers under strict contracts. We may also enhance data quality to optimise its use.

If you prefer not to be included in analysis or profiling activities, or if you would like more information about these processes, please contact us.

3. When we share your data

We will never sell your personal data to a third party

We will only pass your data to third parties in the following circumstances:

- **Referral Practices:** When we refer an animal to a referral hospital or specialist, we need to share relevant information to arrange appointments, tests, treatments and services.
- Laboratories and Animal Crematoria: So that we can arrange tests, treatments and services and obtain results on your behalf.
- **Insurance Companies:** So that we can obtain permission to perform certain investigations and treatments at their expense. To arrange payment for investigations and treatments provided.
- Banks and Payment Service Providers: So that we can deal with payments for the appointments, services, treatments and goods provided. To make refunds.
- Credit Reference and Fraud Prevention Agencies: We may share your personal information with and obtain information about you from credit reference agencies or fraud prevention agencies. To verify financial transactions, detect fraudulent activity, and manage payment risks.
- **Debt Collection Agencies:** If you fall behind with payments for the services we provide, we may engage a debt collection agency to recover the debt on our behalf. If payments for services are overdue, we may engage a debt collection agency to recover outstanding amounts.
- **Email Providers, Printers and Mailing Houses:** So that we can send you reminders, administrative information relating to the way we provide services to you, information about animal health issues relevant to you and marketing communications if you have consented to receive them.
- Law Enforcement Agencies: If we receive in writing a law enforcement agency, we may be required to provide your personal information.
- Moving Practice: If you decide to move to a new practice, we will provide a copy of your animals' records to the new practice when requested. This is part of our professional conduct obligations from the Royal College of Veterinary Surgeons.
- **Insurance Providers**: If we receive a formal request from law enforcement or regulatory authorities, we may disclose relevant personal data where legally required.
- Marketing and Advertising Partners: We may share anonymised data with third-party marketing
 providers to improve our services and reach our audience more effectively.
- **Explicit Consent:** you have provided your explicit consent for us to pass data to a named third-party.
- **Participate in an Event:** If you participate in an event hosted by another organisation, your details may need to be shared. In such cases, we will inform you before sharing your information.



We may also have a legitimate interest in sharing some of your personal data with third-parties, in particular the National RSPCA, who as the umbrella charity supports branches in governance and administration.

We may share your information across the RSPCA Woodside and its subsidiary companies like our Trading company, all of which are separately registered with the ICO as data controllers. The sharing of data between us and each subsidiary is subject to a written data sharing agreement.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

We retain your personal information only as long as necessary for the purposes for which it was collected. Our retention periods include:

- Financial Transactions & Tax Compliance: We keep payment records and donation details for six years to comply with HMRC regulations.
- Customer & Service Records: Contact information and correspondence related to services will be retained for up to five years after your last interaction with us.
- Legal Claims & Compliance: If legal claims arise, we may keep records for the statutory limitation period.
- Marketing Preferences: If you unsubscribe from marketing communications, we will retain minimal data to honour your opt-out request.

5. Automated Decision-Making & Profiling

We use data analytics and profiling techniques to enhance our services and marketing efforts. This includes:

- Personalised Marketing: Based on your past interactions, we may recommend relevant services or products.
- Fraud Detection: Automated systems monitor financial transactions to detect suspicious activity.
- Donation & Engagement Analytics: We analyse supporter engagement to tailor future fundraising campaigns.
- Ad Targeting: We may participate in programs like Facebook Custom Audiences, using encrypted data to display relevant advertisements on social media platforms.

You have the right to object to automated processing. To opt out, contact us using the details in the Your Rights section.



6. Website Tracking & Cookies

We collect data about website visitors through cookies and analytics tools. This includes:

- IP Address Tracking: We log IP addresses to improve website security and detect fraudulent activity.
- Analytics & Usage Data: We use Google Analytics and similar tools to track website traffic and user interactions.
- Marketing Pixels: We may use tracking pixels from platforms like Facebook and Google Ads to measure ad performance.

You can manage your cookie preferences through your browser settings or by using our cookie consent tool available on our website.

7. Security Measures & Data Protection

We implement strict security measures to protect your personal information, including:

- Encryption of Online Payments: Any financial transactions conducted via our website are secured using industry-standard encryption.
- Access Controls: Only authorized personnel can access sensitive data, and access is granted on a need-toknow basis.
- Data Breach Response Plan: In the event of a data breach, affected users will be notified, and appropriate action will be taken in accordance with GDPR guidelines.

For any concerns related to data security, please contact our Data Protection Officer

8. Rights you have over your data

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it
 as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our
 marketing emails).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- Right to Stop or Limit the Processing of Your Data You have the right to object to our processing of your
 personal information if we no longer have the right to use it. You can also request the deletion or
 restriction of your data in certain circumstances.
- Right to Restrict Processing You can ask us to restrict the processing of your personal information if there is a dispute about its accuracy or legitimate use.
- Right to Object You have the right to object to the processing of your personal data in the following cases:
 - If we are processing your data based on legitimate interest.
 - If we are using your data for direct marketing.
 - If we are using your data for statistical purposes.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.



A full summary of your legal rights over your data can be found on the Information Commissioner's website <u>here</u>. If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us via the 'Contact Us' section of our website.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

Telling us when things change

You can help us keep our records up to date by telling us when your contact details and other personal information changes. You can also ask us to stop contacting you altogether.

Please contact reception and they will make the changes for you:

call them on 0116 509 3430

email hello@barneyandbella.co.uk

Write to Data Protection, Barney & Bella, Woodside Animal Centre, 190 Scudamore Road, Leicester, LE3 1UQ

If you tell us that you no longer want to receive further contact from us and you are on our supporter database, it may take a short while before our communications stop altogether as selection of supporter information for some of our appeals is done a few weeks in advance of mailing. If you request to receive no further contact from us, we will securely dispose of your data and will not contact you any further.

9. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded onto your computer when you visit a website. Cookies are used by many websites and can do a number of things (e.g. remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website). The branch does not use cookies or data analytics, but as our website is hosted by us, please see our Cookie Policy.

10. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and are affected.

11. Contacts

You can contact us at any time to update your details, change your communication preferences, opt out of any marketing, change your consent, object to processing, make a subject access request or make a complaint.

By phone: 0116 509 3430

By email: hello@barneyandbella.co.uk

By post: Barney & Bella, Woodside Animal Centre, 190 Scudamore Road, Leicester, LE3 1UQ

Complaints



If you are unhappy with how we have processed your personal information, please contact the Data Protection Officer. Our Data Protection Officer is Raichel Phipps. You can contact her via hello@barneyandbella.co.uk or our postal address. Please mark the envelope 'Data Protection Officer'.

If you are still unhappy you many contact the following:

Information Commissioner's Office

Wycliffe House Water Lane Wilmslow Cheshire, SK9 5AF

Helpline: 0303 123 1113 (local rate) or +44 1625 545 745