

GDPR Privacy Notice

1. Introduction

- 1.1. BENEFIT DOG TRAINING is committed to protecting your personal information and respecting your privacy.
- 1.2. This Privacy Notice sets out the basis on which any personal data that we collect from or about you, or that you provide to us, will be processed by us.
- 1.3. For the purpose of the General Data Protection Regulation [the GDPR], the data controller is BENEFIT DOG TRAINING/Mrs Christine Deakin
- 1.4. We may update this Privacy Notice from time to time. Please check back regularly to see any updates or changes to this Notice.

2. Data Protection Contact

- 2.1. The contact details for any data protection queries are as follows:

2.1.1. *Email: benefitdogs@btinternet.com*

2.1.2. *Telephone: 01785 780096*

3. Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

4. Particulars of processing

- 4.1. We process personal data about clients, trainers, assessors. The categories of person about whom we process personal data are described in more detail in the Annex to this Privacy Notice.

5. Your rights as a data subject

5.1. The General Data Protection Regulation provides the following rights (subject to some exemptions):

- 5.1.1. The right to request access to the personal data that we hold about you;
- 5.1.2. The right to request rectification of the personal data that we hold about you;
- 5.1.3. The right to request erasure of the personal data that we hold about you;
- 5.1.4. The right to request restriction of processing about you;
- 5.1.5. The right to object to processing; and
- 5.1.6. The right to data portability.

If you wish to raise a complaint on how we have handled your personal data, you can contact us as set out in 2.1 above.

If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office (ICO) full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

6. How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest [or for official purposes].

6.1 We will generally process your personal data for contractual necessity in providing services and events. We may also use personal information for additional relevant and related purposes where you might reasonably expect us to do so, where the benefits of doing so are not outweighed by your own interests or fundamental rights or freedoms. This may include:

- 6.1.1. To maintain our records and other administrative purposes, including updating your details and preferences:
- 6.1.2. To facilitate the Kennel Club Good Citizen Dog Scheme;
- 6.1.3. To assist with queries, complaints and dispute resolution

6.2 You have the right to lodge a complaint with a supervisory authority. In the United Kingdom, the supervisory authority is the Office of the Information Commissioner, full contact details for which can be found at <https://ico.org.uk/global/contact-us/>

7. Recipients of Data

- 7.1. We may use service providers to help us provide you with our services. Personal data may be transferred to such service provider, who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data was originally collected or may otherwise be lawfully processed.
- 7.2. Such third parties have contracted with us as data processors under the requirements in the GDPR. They are contractually bound to only use personal data for the agreed purpose(s). Relevant persons working for these third parties will have access to your personal data under the terms of the data processor contract, but only to the extent necessary to perform their services for us.
- 7.3. These data processors agree to implement reasonable contractual and technical protections, to keep your data confidential, not sell your personal data to third parties and to not disclose your personal data to third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.
- 7.4. In appropriate circumstances we may disclose data to authorised bodies as required by law.

8. Contact details

- 8.1. Please contact us via details in 2.1 above if you have any questions or concerns about personal data and privacy matters.

ANNEX

This Annex sets out Benefit Dog Training’s processing of personal data relating to clients for the purposes of Dog Training and the Kennel Club Good Citizen Dog Scheme.

<ul style="list-style-type: none"> • Name • Address • Email address • Telephone number <p>We process your personal data for the following purposes:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 70%;"><i>Purpose</i></td> <td style="width: 30%;"><i>Lawful Basis</i></td> </tr> <tr> <td> <ul style="list-style-type: none"> • Kennel Club Good Citizen Dog Scheme • General Administration </td> <td> <ul style="list-style-type: none"> Contractual Necessity Contractual Necessity </td> </tr> </table>	<i>Purpose</i>	<i>Lawful Basis</i>	<ul style="list-style-type: none"> • Kennel Club Good Citizen Dog Scheme • General Administration 	<ul style="list-style-type: none"> Contractual Necessity Contractual Necessity
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Trainers / Assistant Trainers / GCDS Assessors				
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We also process personal data for the Club’s legitimate interests as we have outlined in the main Privacy Notice (paragraph 4.3). Please be assured that we will always take account of your personal data rights in doing so.

Where do we obtain your personal data from?

Most of the above personal data is received direct from you (the data subject).

How long do we hold your personal data for?

Personal data will be retained in accordance with statutory requirements, Kennel Club requirements and recommendations and the club’s retention policy which is available on request.

Are you obliged to provide us with your personal data?

You are not obliged to provide the personal data in question. However, if you do not provide the personal data, we will be unable to perform any contract we have with you for the provision of our services.

Recipients of your personal data

We disclose data to the following outsourced data processors, in line with section 5 of our main Privacy Policy, for the purposes of The Good Citizen Dog Scheme:

- The Kennel Club

Kennel Club records

The Kennel Club will hold the personal data as a part of the implementation of Kennel Club Rules and Regulations.

Do we use your data for any automated decision-making?

No personal data is processed for automated decision-making

Any financial data arising from a transactional process will be held securely by Benefit Dog Training in accordance and compliance with all statutory and HMRC requirements.

Benefit Dog Training Retention Policy

Benefit Dog Training will only retain personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting or reporting requirements.

Personal data can be further processed and stored for archiving in the public interest and statistical and historical research purposes. When doing so we will consider: any link to the initial purpose, the context the data was collected in, the reasonable expectations of clients/trainers/assessors, the nature of the data, the consequences of further processing and the existence of appropriate safeguards. Also whether such data can be “anonymised” if being preserved for archives.

Financial Records

There is a statutory requirement to keep financial records for seven years. However, records may be kept for at least eight years in order to ensure that year ends are available.