

## PRIVACY POLICY

Pawtrack.com Limited (“we” and “us”) is committed to protecting your privacy.

This notice should be read in conjunction with the Terms of use for [www.pawtrack.com](http://www.pawtrack.com) (the “Website”) of which it forms part (the “Terms”).

This Privacy Policy explains how we use the information we collect about you, how you can instruct us if you prefer to limit the use of that information and procedures that we have in place to safeguard your privacy.

You can visit the Website without disclosing any personally identifiable information about yourself.

By using this Website or submitting information to us through or in connection with this Website, you signify your consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy. If you do not agree with this Privacy Policy, you must not use this Website or submit information to us through or in connection with this Website

### 1 THE INFORMATION WE COLLECT AND HOW WE USE IT

We will use, store or otherwise process any personal information that relates to and identifies you, including but not limited to your name, postal address, e-mail address, telephone number, your credit or debit card number and expiry date and any other information collected on registration, on placing an order and through surveys to the extent reasonably necessary to provide the services that are available through our Website to you by us.

We process this information for the purpose of:

- dealing with your inquiries and requests;
- providing and personalising our services;
- compiling your profile;
- administering membership records;
- matching you with other users;
- processing your payment;

We also gather this information and statistics for the purposes of monitoring Website usage and may provide such aggregate information to third parties. These statistics will not include information that can be used to identify you.

If you choose to post messages in our forum or other message areas, we will collect that information you provide to us. We retain this information as necessary to resolve disputes, provide customer support and troubleshoot problems as permitted by law.

If you stop using the Website or your permission to use the Website is terminated, we may continue to use and disclose your personal information in accordance with this Privacy Policy (as amended from time to time) and as permitted by law. However, if you wish us to stop e-mailing you with information in connection with the Website, please send your request in accordance with paragraph 4 below.

### 2 INFORMATION SECURITY

The Internet is not a secure medium. However, we have put in place various security procedures as set out in this policy. All payments are currently made via the Paypal payment system. Your user admin area is protected by your user name and password, which you should never divulge to anyone else.

Please be aware that communications over the Internet, such as emails/webmails are not secure unless they have been encrypted. Your communications may route through a number of countries

before being delivered – this is the nature of the World Wide Web/Internet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

We believe that we have appropriate policies, rules and technical measures to protect the personal data that we have under our control (having regard to the type and amount of that data) from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss.

All of our employees and data processors that have access to, and are associated with, the processing of your personal information are obliged to respect the confidentiality of our visitors' information.

We ensure that your information will not be disclosed to government institutions or authorities except if required by law or when requested to by regulatory bodies or law enforcement organisations.

### **3 TO WHOM WILL YOUR INFORMATION BE DISCLOSED?**

Your information may, for the purposes set out in this Privacy Policy, be disclosed for processing to:

- our employees;
- our affiliates;
- our group companies and their employees;
- successors in title to our business;
- government bodies and law enforcement agencies and in response to other legal and regulatory requests;
- auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes,

in any jurisdiction where we operate.

### **4 YOUR RIGHTS IN RELATION TO YOUR INFORMATION**

You can write to us at any time to obtain a copy of your information and to have any inaccuracies corrected. Where appropriate, you may have your personal information erased, rectified, amended or completed. Please email us to enable this.

Please quote your name and address. We should be grateful if you would also provide brief details of the information of which you would like a copy or which you would like to be corrected (this helps us to more readily locate your data).

We will require proof of your identity before providing you with details of any personal information we may hold about you..

### **5 COOKIES**

Pieces of information transferred to your computer's hard disk from a website are known as cookies. They allow our Website to store information about your browsing patterns, making the Website more useful to you. Many major sites use cookies: in fact, they are commonly used throughout the Internet to offer personalised services. Most browsers are automatically set to accept cookies. Each time you use our Website, the cookie is accessed. This way, we can track the features you use and the pages and content that you view on the Website to help personalise your experience.

You may disable cookie support on your browser but be aware that by doing so, you will lose certain features that require a cookie to work properly. We may use the information collected by the cookie to provide us with various statistics without identifying any individual.

Please contact us at [info@pawtrack.com](mailto:info@pawtrack.com) if you require information about disabling any cookies on the Website.

## 6 YOUR CONSENT

By submitting any personal information (including, without limitation, your membership application and your payment details) to us you consent to the use of information as set out in this policy. We reserve the right to amend or modify this Privacy Policy and if we do so we will post the changes on this page. It is your responsibility to check the Privacy Policy every time you submit information to us or place an order. Use will signify that you agree to any such changes.

In the event the purposes for processing change, then we will contact you as soon as practicable and seek your consent where such notification relates to a new additional purpose for processing.

Owing to the global nature of the Internet infrastructure, the information you provide may be transferred in transit to countries outside the European Economic Area. We also operate globally and so it may be necessary to transfer your personal information to other companies within our group of companies located in countries outside of the EEA. Countries outside of the EEA may not have similar protections in place regarding your data and its use as set out in this policy. However, we have taken the steps outlined above to try and protect the security of your information.

## 7 THE DATA PROTECTION ACT 1998

Pawtrack.com Limited has made all relevant notifications under the terms of the Data Protection Act 1998 and we ensure we comply with all the protection the Act affords to you.

### USE OF YOUR PERSONAL INFORMATION SUBMITTED TO OTHER WEBSITES

We are not responsible for the privacy policies and practices of other websites even if you accessed the third party website using links from our Website.

We recommend that you check the policy of each website you visit and contact the owner or operator of such website if you have concerns or questions.

## 8 GDPR

The EU General Data Protection Regulation (GDPR) is a privacy and data protection regulation in the European Union effective from May 25 2018.

The GDPR imposes new obligations on organisations that control or process personal data and introduces new rights and protections for EU citizens.

We are committed to ensuring that your privacy is protected and we strictly adhere to the provisions of all relevant Data Protection Legislation, including GDPR, ensuring all personal data is handled in line with the principles outlined in the regulation that state:

Personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
4. Accurate and, where necessary, kept up to date
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

Pawtrack respect our customer and learner's rights to data privacy and protection and as such we have revised our internal policies, procedures, working practices in order to meet the requirements of the GDPR.

We place a high priority on protecting and managing data in accordance with accepted standards and indeed helping our customers utilise our products and services to the same end.

Pawtrack are committed to compliance with the GDPR as both a processor and controller of personal data and have established a working group to lead our GDPR implementation project and ensure compliance on an ongoing basis.

## **9 FURTHER INFORMATION**

For further information from us on data protection and privacy or any requests concerning your personal information please email Pawtrack.com Limited at [info@pawtrack.com](mailto:info@pawtrack.com).