

---

## PRIVACY POLICY

---

### BACKGROUND:

Xtra Dog Design understands that your privacy is important to you and that you care about how your personal data is used. **We** respect and value the privacy of everyone who visits this website, www.xtradog.design (“**Our Site**”) and will only collect and use personal data in ways that are described here, and in a way that is consistent with **Our** obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it.

### 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>“Account”</b>	means an account required to access and/or use certain areas and features of <b>Our Site</b> ;
<b>“Cookie”</b>	means a small text file placed on your computer or device by <b>Our Site</b> when you visit certain parts of <b>Our Site</b> and/or when you use certain features of <b>Our Site</b> . Details of the Cookies used by <b>Our Site</b> are set out in Part 14, below; and
<b>“Cookie Law”</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

### 2. Information About Us

Our Site is owned and operated by Xtra Dog Design, a partnership.

Address: Kings Offices, Millers Lane, Costock, LE12 6XJ.

### 3. What Does This Policy Cover?

This Privacy Policy applies to your use of **Our Site** and our interactions with you. **Our Site** may contain links to other websites. Please note that **We** have no control over how your data is collected, stored, or used by other websites and **We** advise you to check the privacy policies of any such websites before providing any data to them.

### 4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## 5. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which **We** will always work to uphold:

- a) The right to be informed about **Our** collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact **Us** to find out more or to ask any questions using the details in Part 15.
- b) The right to access the personal data **We** hold about you. Part 13 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by **Us** is inaccurate or incomplete. Please contact **Us** using the details in Part 15 to find out more.
- d) The right to be forgotten, i.e. the right to ask **Us** to delete or otherwise dispose of any of your personal data that **We** hold. Please contact **Us** using the details in Part 15 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to **Us** using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if **We are** relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to **Us** directly, **We are** using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask **Us** for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling.

For more information about **Our** use of your personal data or exercising your rights as outlined above, please contact **Us** using the details provided in Part 15.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data **We** hold about you changes, please keep **Us** informed as long as **We** have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about **Our** use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. **We** would welcome the opportunity to resolve your concerns ourselves, however, so please contact **Us** first, using the details in Part 15.

## 6. What Data Do You Collect and How?

Depending upon your use of **Our** Site, **We** may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. Please also see Part 14 for more information about **Our** use of Cookies and similar technologies. **We** do not collect any 'special category' or 'sensitive' personal data, personal data relating to children or data relating to criminal convictions and/or offences.

Data Collected	How We Collect the Data
Identity Information including name, title and business name.	If you complete our contact form or tell us your name by telephone or email.
Contact information including address, email address and telephone number.	If you complete our contact form or give us your details by telephone or email.
Payment information including card details or bank account information.	If you give them to us in the process of making a payment to us.
Profile information including login details.	If you give them to us in the fulfilment of a design or development agreement.
Technical information including IP address, browser type, operating system.	Automatically by visiting our website.

## 7. How Do You Use My Personal Data?

Under the Data Protection Legislation, **We** must always have a lawful basis for using personal data. The following table describes how **We** may use your personal data, and **Our** lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Registering you on <b>Our</b> Site.	Identity, Contact, Payment, Profile and Technical information.	To create an account for you if you choose to sign-up for one of our services.
Providing and managing your Account.	Identity, Contact, Payment, Profile and Technical information.	To provide your account and keep your information up to date.
Administering <b>Our</b> Site.	Technical information.	To ensure our site is functional and to see what information is accessed on it.
Supplying <b>Our</b> services to you.	Profile information.	To access, migrate and/or manage any existing services you may have.
Managing payments for <b>Our</b> services.	Payment information.	To ensure that you are able to pay for our services.
Personalising and tailoring <b>Our</b> services for you.	Technical information.	To tailor your browsing experience.
Communicating with you.	Contact information and Technical information.	To ensure that we are able to effectively communicate with you.
Supplying you with information by email and/or post that you have opted-in-to (you may opt-	Contact information.	To keep you up to date with services that may be of interest to you.

out at any time by clicking the link in any of our automated emails.		
--	--	--

With your permission and/or where permitted by law, **We** may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on **Our** services. You will not be sent any unlawful marketing or spam. **We** will always work to fully protect your rights and comply with **Our** obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

Third Parties (including Instagram, Facebook, Twitter and Google) whose content appears on **Our** Site may use third-party Cookies, as detailed below in Part 14. Please refer to Part 14 for more information on controlling cookies. Please note that **We** do not control the activities of such third parties, nor the data that they collect and use themselves, and **We** advise you to check the privacy policies of any such third parties.

**We** will only use your personal data for the purpose(s) for which it was originally collected unless **We** reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If **We** do use your personal data in this way and you wish **Us** to explain how the new purpose is compatible with the original, please contact **Us** using the details in Part 15.

If **We** need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, **We** will inform you and explain the legal basis which allows **Us** to do so.

In some circumstances, where permitted or required by law, **We** may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 8. How Long Will You Keep My Personal Data?

**We** will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including name, title and business name.	As long as we have an ongoing business relationship or until 12 months from the last point of contact.
Contact information including address, email address and telephone number.	As long as we have an ongoing business relationship or until 12 months from the last point of contact.
Payment information including card details or bank account information.	As long as we have an ongoing business relationship or until 12 months from the last point of contact.

Profile information including login details.	As long as we have an ongoing business relationship where the data is relevant (ie external login details) or until 12 months from the last use of that data.
Technical information including IP address, browser type, operating system.	6 years for historic and trend analysis.

## 9. How and Where Do You Store or Transfer My Personal Data?

**We** will store or transfer some of your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

**We** share your data within the group of companies of which **We are** a part. Where this involves the transfer of personal data outside the EEA, **Our** group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the [European Commission](#).

**We** may use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts require the same levels of personal data protection that would apply under the Data Protection Legislation. More information is available from the [European Commission](#).

Where **We** transfer your data to a third party based in the US, the data may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar to those in Europe. More information is available from the [European Commission](#).

Please contact **Us** using the details below in Part 15 for further information about the particular data protection mechanisms used by **Us** when transferring your personal data to a third country.

The security of your personal data is essential to **Us**, and to protect your data, **We** take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where **We are** legally required to do so.

## 10. Do You Share My Personal Data?

**We** will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If **We** sell, transfer, or merge parts of **Our** business or assets, your personal data may be transferred to a third party. Any new owner of **Our** business may continue to use your personal data in the same way(s) that **We** have used it, as specified in this Privacy Policy.

In some limited circumstances, **We** may be legally required to share certain personal data, which might include yours, if **We are** involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

**We** may share your personal data with other companies in **Our** group for marketing, debt collection and/or fulfilment of our obligations to you. This includes any company within **Our** group.

If any of your personal data is shared with a third party, as described above, **We** will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, **Our** obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the EEA, **We** will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 9.

## 11. **How Can I Control My Personal Data?**

11.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via **Our** Site, you may be given options to restrict **Our** use of your personal data. In particular, **We** aim to give you strong controls on **Our** use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from **Us** which you may do by unsubscribing using the links provided in **Our** emails.

11.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

## 12. **Can I Withhold Information?**

You may access certain areas of **Our** Site without providing any personal data at all. However, to use all features and functions available on **Our** Site you may be required to submit or allow for the collection of certain data.

## 13. **How Can I Access My Personal Data?**

If you want to know what personal data **We** have about you, you can ask **Us** for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 15.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover **Our** administrative costs in responding.

**We** will respond to your subject access request within 28 days and, in any case, not more than

one month of receiving it. Normally, **We** aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date **We** receive your request. You will be kept fully informed of **Our** progress.

#### 14. How Do You Use Cookies?

**Our** Site may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by **Us** and are used only by **Us**. **We** use Cookies to facilitate and improve your experience of **Our** Site and to provide and improve **Our** products and services. By using **Our** Site you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than **Us**. Third-party Cookies may be used on **Our** Site for Social Media and other integrations. In addition, **Our** Site uses analytics services provided by Google Analytics, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling **Us** to better understand how people use **Our** Site.

The following Cookies may be placed on your computer or device:

Cookie	Duration	Purpose	Logged-in Users Only?
devicePixelRatio	Browser default (1 year)	Used to make the site responsive to the visitor's screen size.	No
wordpress_test_cookie	Session	Tests that the browser accepts cookies.	No
__utma	2 years	<u>Google Analytics</u> - Used to distinguish users and sessions. The cookie is created when the JavaScript library executes and no existing __utma cookies exist. The cookie is updated every time data is sent to Google Analytics.	No
__utmb	30 minutes	<u>Google Analytics</u> - Used to determine new sessions/visits. The cookie is created when the JavaScript library executes and no existing __utmb cookies exist. The cookie is updated every time data is sent to Google Analytics.	No
__utmc	Session	<u>Google Analytics</u> - Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.	No
__utmt	10 minutes	<u>Google Analytics</u> - Used to throttle request rate.	No
__utmz	6 months	<u>Google Analytics</u> - Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the JavaScript library executes and is updated every time data is sent to Google Analytics.	No
wp-settings-{user_id}	1 year	Used to persist a user's wp-admin configuration.	Yes
wporg_logged_in wporg_sec	14 days if you select "Remember Me" when logging in. Otherwise, Session.	Used to check whether the current visitor is a logged in WordPress.org user.	Yes

15. **How Do I Contact You?**

To contact **Us** about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: woof@xtra.dog.

Telephone number: 0330 088 3647.

Postal Address: Kings Offices, Millers Lane, Costock, LE12 6XJ.

16. **Changes to this Privacy Policy**

**We** may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if **We** change **Our** business in a way that affects personal data protection.

Any changes will be immediately posted on **Our** Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of **Our** Site following the alterations. **We** recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on February 2019.