

# Privacy Policy

Pet Munchies Limited (“we”) (“us”), (“Pet Munchies”) are committed to protecting and respecting your privacy. This Policy (together with any documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting [www.pet-munchies.com](http://www.pet-munchies.com) you are accepting and consenting to the practices described in this Policy.

This Privacy Policy should be read in conjunction with our Cookie Policy and site [Terms of Use and Terms of Sale](#).

For the purpose of the data protection laws the data controller and processor is Pet Munchies Ltd (registered in England and Wales with company number 06470709) with its registered office at Russell House, 140 High Street, Edgware, Middx. HA8 7LW.

## **Are you aged 16 or under?**

If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide personal information to our site. Users without this consent are not allowed to provide us with personal information.

## **Are you a sole trader / partnership or an individual communicating with us from a business?**

Where we collect and use your personal data from a corporate perspective (i.e. where we are contracting with you as a sole trader or partnership, or contracting with the business you are employed / contracted by) this will be done in accordance with the relevant parts of this Privacy Policy. If you have any questions or concerns about this, please contact us using either the details set out below or by speaking with your usual contact at Pet Munchies.

## **Information we may collect from you.**

We may collect and process the following data about you:

**Information you give us:** you may give us information about you by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you place an order on our site, meet us at an event, or enter a competition or promotion. The information you give us may include your name, address, contact information, payment details and details about your pet(s).

**Information we collect about you:** with regard to each of your visits to our site we may automatically collect:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), products you

viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page and any phone number we share to call our customer service number.

**Information we receive from other sources:** we work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers and search information providers) and may receive information about you from them.

### **Cookies.**

Our site uses cookies to distinguish you from other users of our site. For detailed information on the cookies we use and the purposes for which we use them please see our Cookie Policy.

### **Uses made of the information.**

We use information held about you in the following ways:

#### **Information you give to us - we will use this information:**

- to provide customer support e.g. responding to your enquiries;
- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, goods and services that you request from us;
- to process job applications;
- for internal record keeping;
- to improve our goods and services;
- to create a pet profile;
- to customise our site according to your interests;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or other goods or services we feel may be of interest to you where you have consented (in accordance with the "Consent" section below ("Using your information in accordance with data protection laws")), including in each case competitions or promotions);
- to send you a welcome email, to verify your account when you register with the site or sign-up at one of our events and other emails for the purposes of providing any services or products to you, including in relation to account management or system maintenance;
- to notify you about changes to our goods or services;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to build a profile of you so we can get to know you better. If you do not want us to do this, you can ask us to stop by contacting [info@pet-munchies.com](mailto:info@pet-munchies.com)

Please note we will not use any financial or credit card information for any purpose other than to discharge our legal / regulatory duties and to process payments made by you for our products and services or due to you by agreement (e.g. refunds).

#### **Information we collect about you - we will use this information:**

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to carry out appropriate and necessary investigations and discharge our legal and regulatory obligations and duties, including to comply with anti-fraud and anti-money laundering requirements, and (where applicable) to safeguard our staff and other customers/ users in respect of unlawful, disruptive or objectionable behaviour on our site;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- build a profile of you (and your pet(s)), your preferences and your habits;
- to allow you to participate in interactive features of our site, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- in accordance with the "Consent" section below ("Using your information in accordance with data protection laws") to deliver (whether directly or indirectly via third parties) effective and personalised marketing material and content of Pet Munchies and other companies within our group and to assist us in the improvement and optimisation of advertising, marketing material and content, our services and the sites;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

**Information we receive from other sources:** we may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

#### **Using your information in accordance with data protection laws.**

Data protection laws require that we meet certain conditions before we are allowed to use your data in the manner described in this Privacy Policy. We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. To use your personal data, we will rely on the following conditions, depending on the activities we are carrying out:

**Compliance with legal obligations:** As an entity established under the laws of England and Wales, Pet Munchies is obliged to comply with UK laws and guidance provided by UK regulatory bodies. In particular, we will need to process your personal information to verify your identity, your source of funds for anti-money laundering and fraud purposes, and to establish whether you have been barred from using our site due to objectionable behaviour. You will not be able to object to processing or ask for the deletion of your personal information insofar as it falls under this category.

**Necessary for the entry into / performance of a contract:** When you enter into a transaction with us, a contract between you and us will have been entered into. In order for us to fulfil our obligations under that contract (e.g. to allow you to purchase goods from us), we will need to collect and process your personal information. Failure to provide the requisite personal information on sign-up and financial information on entering into the transaction or objecting to this type of processing / exercising your deletion rights will unfortunately mean we cannot provide our goods / services to you.

**Consent:** We may send you marketing messages by email, targeted ads and text message about us and our goods, services and events where you have not unsubscribed and where you have bought goods or other services from us. We provide easy ways to stop our marketing, and you can opt out at any time.

If you are not a customer of ours but have provided us with consent to use your details for marketing purposes, then we may also contact you about our events, goods and services.

If you have confirmed that you would like to hear from us about other party's goods and services then we will use your details to contact you with marketing information about such party's goods and services.

If you have confirmed that you would like to hear directly from a third party (including other members of our group) about such party's goods and services then we will share your details with such third party so they can contact you about their goods and services.

In each of the situations above, you have the right to withdraw your consent at any time and can object to processing of this nature. Where you consent to us sending you marketing information, we will treat this as lasting for 14 months unless we tell you otherwise at the time.

**Legitimate interests:** To use your personal data for any other purpose described in this Privacy Policy, we will rely on a condition known as "legitimate interests". It is in our legitimate interests to collect your personal data as it provides us with the information that we need to provide our services to you more effectively. Effectively, this requires us to carry out a balancing test of our interests in using your personal data (for example, in order to provide you with the information, products and services that you request from us), against the interests you have as a citizen and the rights you have under data protection laws (for example, to not have your data sold to third party marketing companies without your knowledge, or not store your personal data in insecure or unstable countries or regions). The outcome of this balancing test will determine whether we can use your personal data in the ways described in this Privacy Policy (except in relation to certain marketing activities, where we will always rely on your explicit consent). We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.

### **How long we keep your information for**

When your data is no longer required for the purposes listed above, we will delete it within the periods set out below:

- Marketing consents will be refreshed (and subsequently deleted if necessary) after 14 months;
- Marketing emails and other communications where possible will typically be deleted after 14 months;
- Unsuccessful job applications will typically be deleted after 6 months; and
- Other information (e.g. relating to your purchase): We may keep your personal information for up to 7 years, to enable us to retain the information we may require for legal and regulatory purposes.

### **Disclosure of your information**

We may share your personal information with any member of our group (which means our subsidiaries, our ultimate holding company and its subsidiaries).

We will only share your personal information with other members of the group and third party service providers if it is necessary or reasonably required for any of the purposes listed above/ below.

We will only disclose your information to:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with you;
- members of the group and third party suppliers and service providers for the purposes listed under 'Uses made of the information' above;
- third party suppliers and service providers to the extent they assist the group with its legal / regulatory obligations e.g. providers of services in respect of anti-money laundering, fraud, verification etc.;
- selected third parties so that they can contact you with details of the services that they provide, where you have expressly opted-in/consented to the disclosure of your personal data for these purposes (in accordance with the "Consent" section above ("Using your information in accordance with data protection laws"));
- analytics and search engine providers that assist us in the improvement and optimisation of our site and other selected third parties;
- your employer, educational institution (e.g. school, college or university), email or internet provider, parents (if you are under the age of 18) or law enforcement agencies, or other appropriate third parties, where we consider your behaviour to be unlawful, offensive, inappropriate or objectionable at an event, or on our site.

We may also disclose your personal information to third parties:

- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation;
- in the event that we consider selling or buying any business or assets or merge or enter into a joint venture with another business entity in which case we will disclose your personal data to any prospective sellers or buyers of such business or assets;
- in the event of an insolvency situation;
- in order to enforce or apply our Terms of Sale or other agreements;
- to protect our rights, our property, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **Where we store your personal data**

All information you provide to us is stored on our secure servers or (in the case of payment information) those of our secure payment provider. Where our suppliers are based outside the European Economic Area ("EEA") the data that we collect from you may be transferred to, or stored at, a destination outside the EEA. This includes staff engaged in, among other things, the processing of your payment details and the provision of support services. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Where you have chosen a password to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **Your rights**

Data protection laws give you the right to access information held about you. We will respond to your request within 30 days of receipt.

Our site may, from time to time, contain links to and from the websites of our partners, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **Contact**

If you have any concerns regarding our processing of your personal data, please contact us in the first instance. Questions and comments regarding this Privacy Policy are welcomed. Additionally, if you have any concerns regarding our processing of your personal data, please don't hesitate to contact us. Queries, comments, complaints and requests should be addressed to Pet Munchies, PO Box 1075, St Albans, Herts AL1 9RJ or [info@pet-munchies.com](mailto:info@pet-munchies.com).

If you have concerns regarding our processing of your personal data or are not satisfied with our handling of any complaint or request by you in relation to your personal data, you also have the right to make a complaint to the Information Commissioner's Office. Their address is:

**First Contact Team  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF**

## **Changes to our privacy policy**

We will take reasonable care to keep your information secure and to prevent any unauthorised access or use of it. We process all information in accordance with applicable UK data protection legislation. We may change this Privacy Policy from time to time and the change will take effect once the revised Privacy Policy is available on this Site. Therefore, please refer to this Policy each time you submit your personal information.

Any changes we may make to our Privacy Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Privacy Policy.

This Policy was last reviewed and updated: May 2018

### **Updating your information**

In the event that there is a change to your personal information, for example your contact details, please let us know of this by contacting us (details provided above) so that we can keep your information up to date and accurate.

May 2018