GDPR Privacy Statement

Follow My Lead Dog Training is committed to protecting your personal information and respecting your privacy.

We are detailing below our privacy statement that provides you with the further confidence that we are following personal data protection laws.

We have written this statement to inform you that we are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

**This notice applies to:**

All Clients

All Third Parties and Suppliers with whom we have dealings in the ordinary course of our business including those individuals with whom we send marketing information.

Any reference to ‘we’, ‘us’, ‘our’, ‘the company’ shall mean Jessica Barber, trading as a sole trader under the name Follow My Lead Dog Training.

Any reference to ‘you’ or ‘Data Subject’ shall mean any individual receiving this notice for whom we hold personal data.

This Privacy Statement does not include information relating to the retention of data on limited companies as such data is not incorporated within the provisions of GDPR.

This Privacy Notice also applies to the website; https://www.followmyleadtraining.co.uk

In most circumstances your data will be held by us as a “Data Controller”. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you about the holding of information in this privacy notice.

We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

**DATA PROTECTION PRINCIPLES**

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

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

 **THE KIND OF INFORMATION WE HOLD ABOUT CLIENTS**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about our clients:

* Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.

We may collect, store, and use the following categories of personal information:

* Information about your health, medical conditions, or disabilities, where this information holds relevance to training activities.

**WHY WE HOLD INFORMATION ON CLIENTS**

It is necessary for us to retain data on clients in order for us to fulfil our contractual obligations and hold data for legitimate business needs.

We will only retain data which we reasonably require and for a period which is reasonably necessary.

We will not disclose your data to the third parties unless you have consented for us to do so or we are otherwise required to do either contractually or under another law or enactment.

**HOW WE COLLECT PERSONAL INFORMATION**

We collect personal information about clients directly from themselves when they contact us via telephone, email, social media or through our website.

Client and business data is stored within a GDPR compliant Dropbox cloud account. Data on current clients that we are actively working with is also stored in our mobile telephone that is also password encrypted.

We reserve the right to change the systems in which data is stored without notification to another equivalent system but at all times we will ensure the appropriate security of your data and GDPR compliance.

**HOW WE WILL USE YOUR INFORMATION.**

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:

* Where we need to perform the contract we have entered into with you.
* Where we need to comply with a legal obligation.
* Where it is necessary for our legitimate interests 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:

* Where we need to protect your interests (or someone else’s interests).
* Where it is needed in the public interest (or for official purposes).

Situations in which we will use your personal information:

We need the information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

* Administering the contract we have entered into with you.
* Dealing with legal disputes involving you.
* To prevent fraud.
* To market other products or services which we offer which may be of interest to you.
* To inform you about updates about our services.
* Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

In certain circumstances listed above, we hold your data to market other services to you or send you information that we think may interest you. We have a legitimate business interest in retaining your data for this purpose, but you may ‘opt out’ of receiving these types of communication from us.

**Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

**THE KIND OF INFORMATION WE HOLD ABOUT INDIVIDUALS OTHER THAN CLIENTS AND HOW THIS DATA IS USED**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

During our day to day business we acquire information regarding individuals other than our clients and we will retain this data where we have a legitimate business reason to do so.

Typically, we acquire personal data on individuals, third parties and suppliers other than our clients in the following circumstances:

* Where we have met individuals, third parties and suppliers at networking or other marketing events;
* Where individuals, third parties or suppliers have made enquiries with us regarding possible services but have not subsequently become clients of our business;
* Where we have dealt with individuals, third parties or suppliers in the capacity as suppliers of goods or services to us;
* Where we have regular business-related dealings with you.

We have a legitimate business interest in retaining this data to send informative blogs, event details or other updates relating to our services or something that we believe relates to your interests. You have the right to ask us to erase or rectify your data and you have the right to opt out of receiving marketing, networking information or information we think might be of interest to you.

**Why might we share your personal information with third parties?**

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

**DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of these measures may be obtained directly from jess@followmyleadtraining.co.uk.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

The transmission of information via the internet is not completely secure. we cannot guarantee the security of your data transmitted online and transmission is made at your own risk. If you communicate with us by email then you assume the risks of such communications being intercepted, not received or delivered, or received by individuals other than the intended recipient.

**DATA RETENTION**

How long will we use your information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

In respect of client data, you can expect us to hold data relating to your instructions for a period of seven years after completion of the last training interaction. The reason for this is that the Limitation Act 1980 typically provides that legal proceedings for breach of contract or negligence can be brought up to six years after the events. we therefore have a legitimate business interest in retaining the data should any subsequent legal proceedings ensue.

Given the nature of our services clients often return to us with repeat instructions within weeks, months or years of contacting us in the first instance. The seven-year period referred to above will start from the last contact we had with the client, third party or supplier, to ensure We are able to assist as and when we need to. Should you not contact us for seven years, we will confidentially destroy all data held for you.

**RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

Your duty to inform us of changes:

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information - Under certain circumstances, by law you have the right to:

* Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that We are lawfully processing it.
* Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
* Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
* Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
* Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
* Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Jessica Barber at jess@followmyleadtraining.co.uk.

Please note that where you ask us to erase, correct, object to process or seek to restrict our processing of data we may refuse your request where we have a legal obligation, contractual or other legitimate business interest to refuse your request. If we refuse your request, then we will notify you of this refusal and you will have the right to appeal.

**What we may need from you**

We may need to request specific information from you to help confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

**RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact jess@followmyleadtraining.co.uk. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you have any questions about this privacy notice or how we handle your personal information, please contact us at jess@followmyleadtraining.co.uk. You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

**COOKIES POLICY**

Our website does not use cookies as part of the user website experience. [Cookies are small files saved to the user’s computer’s hard drive that track, save and store information about the user’s interactions and usage of the website]. Unfortunately, we cannot guarantee that your user experience will be totally free from Cookies, data tracking or data analytics if you found the website via a third-party website or search engine.

Other cookies may be stored to your computer’s hard drive by external vendors if the website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

 **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time, and we will provide a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

**CONTACT AND FURTHER INFORMATION**

If you have any questions about this privacy notice or wish to submit a complaint, then please email jess@followmyleadtraining.co.uk

You have the right to make a complaint to the Information Commissioners Office or such other regulatory body or supervisory authority as may be appointed from time to time.

If you make a complaint, then we will respond to let you know how your complaint will be handled.