



ADVOCATES FOR ANIMALS PRIVACY POLICY

LAST UPDATED: 23 April 2022

1. INTRODUCTION AND SCOPE

- 1.1 Advocates for Animals (“we,” “us,” “our”) respects your privacy and is committed to protecting your Personal Data. We are the data controller of your Personal Data. The “**data controller**” means the party or parties responsible for deciding how and for what purposes your Personal Data is processed. This Privacy Policy (“**Policy**”) sets out how we handle your Personal Data.
- 1.2 We reserve the right to modify this Policy as needed, for example, to comply with changes in laws, regulations, our internal procedures, or requirements imposed by data protection authorities.

2. DEFINITIONS

- 2.1 In this Policy, the following terms have the meanings set opposite them.
- (a) “**Personal Data**” means any information about an identified or identifiable person (“**data subject**”); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, genetic, mental, economic, cultural or social identity.
- (b) “**Processing**” means any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction (“**process**” and “**processed**” shall be construed accordingly).
- (c) “**Sensitive Personal Data**” means, in relation to a data subject, any data about their racial or ethnic origin, political opinions, religious or other beliefs, whether they are a member of a trade union, their physical or mental health or condition, sexual life, their commission or alleged commission of any offence, any proceedings for any offence committed or alleged to have been committed by them or the disposal of such proceedings or the sentence of any court in such proceedings.

3. WHAT PERSONAL DATA WE COLLECT

- 3.1 You do not have to give us any Personal Data in order to use most of our websites, and in most instances you will provide us with your Personal Data voluntarily. However, there are circumstances

in which we may not be able to assist you, or an organisation with which you are associated, unless you provide us with your Personal Data. For example, your Personal Data may be required for legally required compliance checks, to carry out instructions, for security and other reasons to allow you to access one of our events or premises. In these cases, without the relevant Personal Data, we may be unable to assist you or your organisation, and we would inform you or your organisation that this is the case.

3.2 When you use our website or when we interact with you, the personal data we collect may include (but is not limited to):

- Contact information, such as your name, job title, postal address, including your home address, where you have provided this to us, business address, telephone number, mobile phone number, fax number and email address;
- Information about how you use our websites, including the services you viewed;
- Physical access data, relating to details of your visits to premises we use for events;
- In connection with the registration for and provision of access to an event or seminar, we may ask for your Sensitive Personal Data.

3.3 For our legal services, we may collect:

- In addition to all or some of the information listed above, information collected from publicly available sources or data sites for client due diligence purposes;
- Identification information from you or from your organisation or other third parties for compliance with our legal and professional duties;
- Payment data, such as data necessary for processing payments and fraud prevention, and other related billing information;
- Other personal data regarding your preferences, opinions and comments where it is relevant to our services;
- Information regarding the issue or matter in respect of which we have been engaged to provide legal services, which may contain personal information about you. In the course of our client services, we may represent you and/or your organisation in legal matters that require us to collect and use Sensitive Personal Data relating to you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, details of criminal offences, or genetic or biometric data).

4. HOW PERSONAL DATA IS COLLECTED

4.1 We may collect personal data about you in a number of circumstances, including:

- When you use our website;
- When you or your organisation seek legal advice from us or when you are engaged by us on behalf of our clients;
- When you make an inquiry about our services or otherwise interact on our website;
- When you attend a seminar or event with us or a third party we are working with or sign up to receive publications from us;
- When you or your organisation provide services to us or seek to provide such;
- When you interact with us by telephone, email and other electronic communication;
- From third parties, such as government agencies, a credit reporting agency, information service providers, or from publicly available records; and
- From social media sites.

5. PURPOSES FOR PERSONAL DATA PROCESSING

5.1 We will use the personal data listed above if and to the extent necessary to achieve the following purposes:

- To provide legal advice or other services, as instructed or requested by you or your organisation;
- To manage and administer you or your organisation's relationship with us, including billing and collection, marketing and support services, and taking other steps linked to the performance of our business relationship;
- To comply with our legal and regulatory obligations such as for anti-money laundering, financial and credit checks, audit requirements, fraud and crime prevention and detection, and record keeping. This may include automated checks of personal data you or your organization provide about your identity against relevant databases, and contacting you to confirm your identity, or making records of our communications with you for compliance purposes;
- To analyse and improve our services and promote our business, such as by sending you publications and invites;
- To protect the security of and managing access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities;
- To comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies;
- To comply with court orders and to exercise and/or defend our legal rights;
- For any other purposes related and/or ancillary to any of the above, or any other purposes for which your personal data was provided to us.

5.2 We process Personal Data only as permitted by law. Most commonly, we rely on the following legal bases:

- (a) where necessary to perform the contract between you and Advocates for Animals;
- (b) where we need to comply with a legal obligation;
- (c) where it is necessary for our legitimate interests (or those of a third party) your fundamental rights do not override those interests.

6. COOKIES

6.1 When you use our website, we may collect information using "cookies". Cookies are small data files stored on the hard drive of your computer or mobile device by a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them) to provide you with a more personal and interactive experience on our website.

6.2 We use two broad categories of cookies:

- first party cookies, served directly by us to your computer or mobile device; and
- third party cookies, which are served by our partners or service providers on our website

6.3 You can typically remove or reject cookies via your browser settings. In order to do this, follow the instructions provided by your browser (usually located within the "settings", "help" "tools" or "edit" facility). Many browsers are set to accept cookies until you change your settings. If you do not accept our cookies, you may experience some inconvenience in your use of our website. For example, we may not be able to recognise your computer or mobile device and you may need to log in every time you visit our Site.

7. SPECIAL CATEGORIES OF DATA

7.1 To the extent we need to hold, collect or otherwise process any Sensitive Personal Data, we will ensure that the individual to whom such Sensitive Personal Data relates is informed of such

collection and processing. Where required by law, the person's explicit consent to the processing and particularly to the transfer of such data to any third party will be obtained.

7.2 Appropriate security measures (e.g. physical security devices, encryption, and access restrictions) will be taken depending on the nature of these categories of data and the risks associated with the intended uses.

8. SECURITY AND CONFIDENTIALITY

8.1 We will take appropriate technical, physical, and organisational measures to protect Personal Data against unauthorised access, unlawful processing, accidental loss or damage, and unauthorised destruction. In determining the appropriate security measures, we will take into account technological developments and assess the measures against the risk of harm that may result from any security breach.

9. YOUR RIGHTS

9.1 By law you have the right to:

- **Request access to your Personal Data.** This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- **Request correction of the Personal Data 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 Data.** This enables you to ask us to delete or remove Personal Data 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 Data where you have exercised your right to object to processing (see below).
- **Object to processing of your Personal Data.** This right exists where we are relying on a legitimate interest as the legal basis for our processing and there is something about your particular 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 Data for direct marketing purposes.
- **Request the restriction of processing of your Personal Data.** This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your Personal Data.** We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent.** This right only exists where we are relying on consent to process your Personal Data. If you withdraw your consent, we may not be able to provide you with access to the certain specific functionalities of our website. We will advise you if this is the case at the time you withdraw your consent.

9.2 We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security

measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

- 9.3 If you want to exercise any of the rights described above, please contact info@advocates-for-animals.com.

10. DATA RETENTION

- 10.1 We will only retain your personal information for so long as we reasonably need to use it for the purposes for which we have collected it, unless a longer retention period is required by law or internal policy (for example for regulatory purposes).

11. TRANSFERRING DATA

- 11.1 **Selected Third Parties:** At times, we may be required to transfer Personal Data to selected external third parties that we have hired to perform services on our behalf. These third parties may process the Personal Data in accordance with our instructions or make decisions regarding the data as part of the delivery of their services.

- 11.2 **Other Third Parties:** We may be required to disclose certain Personal Data to other third parties:
- (a) as a matter of law (e.g., to tax and social security authorities); or
 - (b) to protect our legal rights (e.g., to defend a litigation suit).

- 11.3 Personal Data may be transferred to and stored in a country whose laws do not provide equivalent protection to that which applies in your home country. In such circumstances, we will implement contractual or other measures to ensure an adequate level of protection for your Personal Data.

12. COMPLAINTS

- 12.1 If you would like to make a complaint regarding this Privacy Policy or our practices in relation to your personal information, please contact us at info@advocates-for-animals.com. We will reply to your complaint as soon as we can.
- 12.2 If you feel that your complaint has not been adequately resolved, please note that you have the right to contact your local data protection supervisory authority, which, for the UK, is the Information Commissioner's Office.