

PRIVACY POLICY AND COOKIES POLICY

Last update: 26/06/2018

WHO WE ARE

By Gables Dogs & Cats Home and our subsidiaries we mean:

- The Charity, Gables Dogs & Cats Home (registered charity number 1127194).
- Gables Enterprises Limited (registered company number 04450483), which is our trading arm, where 100% of profits go to the Charity.

DATA PROTECTION

Our commitment to care doesn't stop at our animals. We care about your personal data and ensuring you're informed about how we use it. Gables promises to protect your data, and to manage any information you share with us in line with data protection laws.

This Privacy Policy sets out how and why Gables (including both the charity and the trading company) will collect and use your personal data and our legal basis for its use, to ensure you remain informed and in control of your information.

Please read this policy carefully, along with our Terms and Conditions and any other documents referred to in this policy, to understand how we collect, use and store your personal information.

If you have any questions about how Gables processes your information, please get in touch using the details in the "Contact us" section below.

TYPES OF PERSONAL DATA WE COLLECT

Depending on your interaction with Gables, we'll collect the following types of information about you:

- Your contact details, such as name, postal address and email address.
- Your financial information such as bank account details.
- Your Gift Aid declaration.
- A record of our communications with you.
- Your communication preferences.
- Your giving/donation history.
- Your interests and reasons for your support.
- Information collected as part of our rehoming service, such as details relating to your personal circumstances.
- Information about your dog or cat, such as their behaviour, medical conditions and treatments as part of the relinquishment of pet's process.

- Photography and videography, such as images at events, case studies and other marketing materials.
- Sensitive information.
Under data protection law, certain categories of personal information are recognised as sensitive, including health information. Gables will sometimes collect sensitive personal data in connection with our rehoming services (for example that the right animal is rehomed with you), or where you volunteer or apply for a job with us. In these cases we will obtain your consent to process this data, or alternatively ensure that we have a valid legal basis for doing so, such as when it is in the substantial public interest.

WHERE DOES THIS INFORMATION COME FROM?

Most personal data we process is given to us directly by our supporters and customers in the course of their interactions with us.

We may also receive your personal information when you donate to Gables through third-party services such as Just Giving, Sagepay or Paypal.

HOW WE USE YOUR DATA

In simple terms, your personal data may be used to help us effectively deliver our charitable services or to help us raise funds for those charitable services.

We have summarised below the different reasons why we do this (these are often referred to as ‘purposes’). How we use your data for these purposes will depend on the nature of our relationship with you.

CATEGORY	EXAMPLES OF PURPOSES FOR WHICH WE COLLECT, STORE AND PROCESS YOUR DATA
Rehoming dogs and cats	<p>If you have registered to rehome a dog or cat from us we will use the information you provide us to help us find you the right animal.</p> <p>To provide you with aftercare services once you have adopted an animal.</p> <p>To communicate with you regarding our wider work and how you might support Gables in other ways.</p>
Taking in unwanted dogs and cats	<p>If you have contacted us to take in your dog or cat for rehoming, we will use the information you provide us to establish how we can best look after your dog or cat while it is in our care.</p> <p>To assess how we might safely and permanently rehome your dog or cat.</p> <p>To enable us to meet the relevant legal requirements where they apply to dogs or cats brought into our care.</p>
Reporting lost or found dogs and cats	To register details of a lost or found dog or cat for the purposes of reuniting owners with their pet.
Volunteering	To enable us to recruit volunteers and foster carers.

CATEGORY	EXAMPLES OF PURPOSES FOR WHICH WE COLLECT, STORE AND PROCESS YOUR DATA
	<p>To support and train volunteers and ensure their safety.</p> <p>To enable us to communicate with volunteers regarding their volunteering work, the wider work of Gables and how they might support in other ways.</p>
Marketing and Fundraising	<p>To send you marketing, including behind the scenes news, updates about our animals, general information about rehoming, volunteering and various ways you can support Gables, including fundraising, events and campaigning.</p> <p>To efficiently raise the fundraising income to ensure our charities future.</p> <p>To manage, facilitate and record financial transactions associated with fundraising.</p> <p>To manage events and fundraising activities.</p> <p>To manage Gables supporters club and animal sponsorship schemes, including renewals.</p> <p>To ensure that as many supporters as possible maximise the value of their donation through Gift Aid.</p>
Raffles and Lotteries	<p>To process your payment and to enter you into the draw.</p> <p>To confirm your entry into the draw via email if you entered online.</p> <p>To verify age (via a third party) and to contact you if we cannot verify that you are over 18 and able to enter the draw.</p>
Legacies	<p>If you have got in touch with us about leaving us a legacy, we will manage and administrate your legacy pledge.</p>
Events	<p>To process registration/stall fees, administer events.</p> <p>To collect and store images and videography with the purposes to promote future fundraising events.</p>
Media & PR	<p>Contacting you about press enquiries and case studies to help promote our work.</p>
Donations	<p>To process your donation and send you a thank you letter or email.</p> <p>We may also use your personal information for the recovery of Gift Aid (where you have completed a Gift Aid declaration).</p>
Retail trading and online purchases	<p>To fulfil orders for goods and services.</p>
Enquiries	<p>To enable us to record, consider and reply to enquiries.</p>
Research	<p>To send you surveys.</p> <p>To carry out research in relation to our supporters and services.</p>
Employment	<p>To enable the Home to select and recruit staff.</p>
Photograph / videography	<p>To archive and store images and videos for historical interest and event promotion.</p>

REHOMING

When you adopt one of our dogs or cats we ask you to provide us with information about your home, personal circumstances, and in some cases health or mobility requirements so that we are better able to match you with an animal that is going to best meet its, and you or your family's needs.

We will also ask for certain information about your animal and you (including the reason or circumstances that led to you needing to rehome your pet, and any information about your pet's behaviour towards yourself and others in the household that will help us with their care or onward rehoming) when you bring in an animal that you would like to be rehomed, or that you are reporting as a stray.

We also ask for this information so that we can comply with the relevant legal requirements when rehoming an animal such as establishing the legal ownership of animals or updating microchip details.

MARKETING AND FUNDRAISING

Gables marketing activity helps to find more animals permanent and loving homes, and helps us to raise the income we need which enables us to do this. Our marketing activity also helps us to provide help to animals beyond our gates, such as through our community engagement work, educational and campaigning activity.

Gables will seek your consent to send you marketing via email, phone and by post, If you choose to hear from us in this way, you'll receive behind the scenes news, updates about our animals, general information about rehoming, volunteering and various ways you can support Gables, including fundraising, events and campaigning. Examples include a monthly update email, emails inviting you to events, and email updates on our campaigning activity.

Gables will rely on legitimate interests to send you marketing and fundraising communications by post, if you have provided a postal address. Unless you tell us not to, we'll contact you by post with communications we believe you'll be interested in. If you would like to opt out of these communications, you can let us know by contacting us.

When you register to attend or take part in one of our fundraising or challenge events we will use your information to process the registration fees (if any), administer your participation in the event and provide you with information about the event.

We will never rent, swap or sell your details for marketing purposes.

You're free to change your contact preferences at any time, just let us know by contacting us.

FINANCIAL TRANSACTIONS

If you donate to us, or buy something from us, we'll process your debit or credit card details. We will also pass your card details securely to our payment-processing partner as part of the payment process. We do this in accordance with the Payment Card Industry Security Standard and don't store the details on our website or databases.

If you have kindly added Gift Aid to your donation to Gables we must record the fact that you are a UK taxpayer and we have to maintain a record of the amount of Gift Aid we have claimed.

ANALYSING YOUR INFORMATION

Gables carries out click-through email tracking, which allows us to analyse when an email has been interacted with (e.g. opened or when links within it are clicked). This helps us to better understand the impact of our communications and success of our campaigns.

HOW THE LAW APPLIES TO GABLES'S USE OF PERSONAL INFORMATION

We are required under law to make sure that we have a valid ground for processing your data. The law sets out six different grounds for when personal data can be processed (plus additional ones where sensitive data is used). The four legal grounds that are most relevant to Gables use of your personal information are:

1. Consent
2. Legitimate Interest
3. Contract
4. Legal Obligation

Gables will only process your personal information if any of the following apply:

We have asked you for your express **consent** and have a record of this (for example, we will ask for your consent to send you marketing communications by email).

We have a **legitimate interest** to do so. Our use will be fair and balanced and never unduly have an impact on your rights (for example, it is in our legitimate interests to analyse the data you provide so that we can improve our services and tailor our communications to you).

We have a **contract** with you which we can only fulfil by using your personal information (for example, if you purchase something from our shop).

We have a **legal obligation** to use or disclose information about you (for example, we are required by law to keep a record of Gift Aid declarations for seven years).

Consent

In some cases we will rely on consent, for example, to send you or make marketing and fundraising emails and phone calls. In addition, if you register as a Gables volunteer it can be very helpful if you share information on any medical conditions that may affect your ability to perform your voluntary work. You can withdraw consent for these channels and activities by contacting us.

Legitimate Interests

This legal ground for processing means that we can process your personal information if we have a genuine and legitimate reason for doing so, and that reason is not overridden by your rights and interests as an individual.

Examples of the legitimate interests processing activities we undertake are:

BUSINESS OBJECTIVES	PROCESSING ACTIVITIES
To allow us to provide the best possible care for every dog and cat	<p>To assess suitability for rehoming and to follow up with you about your rehoming enquiry.</p> <p>To capture the information we need when we take in an animal, to allow us to care for that animal and ultimately rehome it.</p> <p>To provide you with aftercare services once you have adopted an animal from us.</p> <p>To conduct home visits to assess suitability as part of the rehoming process.</p> <p>To register new owners' details with microchip databases.</p>
To raise the fundraising income needed to sustain the charity	<p>To process your donations and Gift Aid where you have asked us to do so.</p> <p>To send you marketing communications by post.</p>
For administration purposes	<p>To provide you with information necessary to an event you have signed up for.</p> <p>To provide you with information about any fundraising activities you have agreed to take part in.</p> <p>To follow up with you about your enquiry.</p>
To conduct research	<p>To conduct supporter satisfaction research.</p> <p>To invite you to take part in surveys or research to help improve our services.</p> <p>To conduct desk research to help identify high value supporters.</p>
To analyse data to better understand our supporters and tailor our communications to them	<p>To analyse your data in order to better understand your preferences, to improve our services, and to tailor our marketing communications to you.</p> <p>To conduct segmentation to allow us to make our marketing communications more relevant to you, and to enable us to identify potential new supporters.</p>

We have considered and balanced our legitimate interests against individuals' privacy rights in these scenarios and we do not believe that any adversely affect our supporters' rights or interests. If you would like to find out more or ask us to stop processing your data in these ways, you can do this at any time by contacting us.

Contractual relationships

In some cases, we will be under a contractual obligation to provide you with goods and services, which means that we have to process your data in order to fulfil those obligations. Some examples of this include if you are a Gables supporter, sponsor an animal, if you are rehoming a dog or cat from us, or purchasing something from our shop.

A legal obligation

Sometimes we may have a legal obligation to process information about you – for example we are obliged to keep financial records including Gift Aid for seven years. We're required to notify the local dog wardens about stray dogs that come into our care, and we're also required to keep a record of your communication preferences, in accordance with the General Data Protection Regulation.

DATA RETENTION

We'll retain personal information for different periods of time depending on your relationship with Gables.

For example, if you donate to us, we'll keep your financial information for up to seven years after your last interaction with us. If you adopt an animal, we'll keep details relating to your rehoming circumstances for 20 years (the upper limit lifetime of the dog or cat).

If you decide you no longer wish to hear from us, we'll need to keep a note of that on our suppression list indefinitely.

DATA STORAGE

Gables operations are based in the UK and we store our data within the European Economic Area (EEA).

Some organisations which provide services to us may transfer personal data outside the EEA for processing purposes, but we'll only allow them to do so if your data is adequately protected (for example, if they are certified under the EU/US Privacy Shield scheme, or if we have a prescribed contract in place with them).

DATA SHARING

Gables or its trading subsidiary will not exchange or sell your personal information to another organisation for their own marketing purposes.

However, there are some situations where we may have to share your personal information with other organisations. An example could be sharing your details to reunite you with a lost animal via a Local Authority Dog Warden, or to update microchipping databases. In some cases, we may have to share data about you when requested to do so by statutory agencies, such as the police.

We may also share your data with our contracted suppliers, and external service providers, such as our email service providers. In these situations, the relationship between Gables and the third-party data processor will be governed by a contract and strict security requirements will be in place to protect your personal information.

YOUR DATA PROTECTION RIGHTS

When Gables is using your personal information on the basis of your consent, you have the right to withdraw that consent at any time. You also have the right to ask Gables to stop using your personal information for direct marketing purposes. Simply contact us and we will amend your contact preferences.

Presuming that these rights are not overridden by our legal obligations, or where our legitimate interests are not overridden by your rights and interests as an individual, you have the following data protection rights:

The right to be informed

You have the right to be told how your personal information will be used. This policy document, and shorter summary statements used on our communications, are intended to be a clear and transparent description of how your data may be used.

The right of access

You can contact us asking what information we hold on you and to request a copy of that information. From May 2018 we will have 30 days to comply once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity.

The right of erasure

From May 2018, you have the right to be forgotten (i.e. to have your personally identifiable data deleted). We'll be required to keep an appropriate record (such as a suppression list) so that we can make sure you don't receive future communications. In some instances a legal basis will override the right to erasure. An example of this would be the legal requirement to record financial transactions for seven years.

The right of rectification

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated.

The right to restrict processing

In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

Right to Data Portability

Where we are processing your personal data under your consent the law allows you to request data portability from one service provider to another. This right is largely seen as a way for people to transfer their personal data from one service provider to a competitor.

The right to object

You have an absolute right to stop the processing of your personal data for direct marketing purposes.

The right to object to automated decisions

In a situation where a data controller is using your personal data in a computerised model or algorithm to make decisions that have a legal effect on you, you have the right to object. This right is more applicable to mortgage or finance situations; **Gables does not undertake complex computerised decision-making that produces legal effects.**

If you want to exercise any of these rights, please contact our General Manager on:

- **Phone:** 01752 331602
- **Email:** info@gablesfarm.org.uk
- **Post:** Gables Dogs & Cats Home, 204 Merafield Road, Plymouth, PL7 1UQ

FILMING AND PHOTOGRAPHY AT EVENTS

Please note that Gables (or our authorised service providers) or our commercial partners may film or photograph participants, volunteers and spectators attending or taking part in events and use such footage or photographs.

We do this in order to publicise the event for commercial and/or fundraising purposes including, but not limited to: television broadcasts, advertising, publications, marketing material, merchandising, social media, personalised direct mail and other media that may be made available to the public. Secondly, to enable our commercial partners to publicise their involvement and/or association with the event.

No personal details (including names) of any under 16-year-old participants will be used in any publicity materials without the written consent of their parent or legal guardian, but we may use images where children are incidentally included (for example, images of mass participation in the warm-up exercises, or on the starting line of organised runs or crowds at our events).

NOTIFICATION OF CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may change from time to time. For example, we will continue to update it to reflect new legal requirements. Please visit this website page to keep up to date with the changes to our Privacy Policy.

WHAT TO DO IF YOU ARE NOT HAPPY

In the first instance, please talk to us directly so we can help resolve any problem or query. Please contact our General Manager on:

- **Phone:** 01752 331602
- **Email:** info@gablesfarm.org.uk
- **Post:** Gables Dogs & Cats Home, 204 Merafield Road, Plymouth, PL7 1UQ

You can also register with the fundraising preference service (FPS). This service is run by the Fundraising Regulator and allows you to stop email, telephone, addressed post, and/or text messages from a selected charity or charities by using the online service at public.fundraisingpreference.org.uk or by calling 0300 303 3517. Once you have made a request through the FPS, we will ensure that your new preferences take effect within 28 days.

You also have the right to contact the Information Commissioners Office (ICO) if you have any concerns about Data Protection using their help line **0303 123 1113** or at www.ico.org.uk

Contact us

If you have any questions about this Policy, or about how Gables manages your data, please contact us on:

- **Phone:** 01752 331602
- **Email:** info@gablesfarm.org.uk
- **Post:** Gables Dogs & Cats Home, 204 Merafield Road, Plymouth, PL7 1UQ

COOKIES & ONLINE TRACKING POLICY

Last updated: 14/05/2018

WHAT ARE COOKIES?

Cookies are tiny pieces of data saved on your computer or mobile device when you visit a website. There are many different cookies, and they each have different uses. We use cookies to enhance your experience on the Gables website and ensure we are providing you content and advertising messages that are relevant to you and your interests. Cookies also track information such as how you arrived on sites, your time of arrival, the pages you viewed and how long you stayed.

The Gables website uses both first party and third party cookies. First party cookies are restricted to the same domain as the website you are viewing, in this case gablesfarm.org.uk, and are used to track the performance of the website and improve the website experience for the user. Third party cookies are set by a domain other than gablesfarm.org.uk – this is to recognise the user (anonymously) across websites and is used to track the performance of our marketing and ensure we are reaching the right audience.

Different cookies store information for varying time periods on your computer or mobile device. You are able to view the cookies held on your computer or mobile device by looking at your cookie settings on your chosen internet browser.

You can find more information about cookies at www.allaboutcookies.org

HOW GABLESFARM.ORG.UK USES COOKIES

Essential cookies

These are required for the operation of our website. Enabling you to log in to secure areas of the website, make use of a shopping cart and e-payment services. We use the following cookies:

TYPE OF COOKIE	COOKIE NAME	PURPOSE OF COOKIE	1ST OR 3RD PARTY	TIME PERIOD
Google Tag Manager	_gtm	A tag management system that enables Gables to dynamically insert tags onto our website.	1st	Duration user is on the website
Essential site cookies	SSESS	To recognise users when they move from page to page within our website, and remember any information they have entered, such as items in their basket.	1st	Duration user is on the website
Essential site cookies	has_js	To identify if javascript has been disabled on a user's browser settings.	1st	Duration user is on the website

ANALYTICAL COOKIES

Google Analytics allows us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. We don't collect or store your personal information (for example your name or address) so this information can't be used to identify who you are. We don't allow Google to use or share our analytics data. To reject or delete this cookie visit:

<https://www.google.com/intl/en/privacypolicy.html>

<https://tools.google.com/dlpage/gaoptout>

Google Analytics sets the following cookies:

TYPE OF COOKIE	COOKIE NAME	PURPOSE OF COOKIE	1ST OR 3RD PARTY	TIME PERIOD
Google Analytics	_ga	This helps us count how many people visit Gables.org.uk by tracking if you've visited before	1st	2 years

TYPE OF COOKIE	COOKIE NAME	PURPOSE OF COOKIE	1ST OR 3RD PARTY	TIME PERIOD
Google Analytics	_gid	This helps us count how many people visit Gables.org.uk by tracking if you've visited before	1st	24 hours
Google Analytics	_gat	Used to manage the rate at which page view requests are made	1st	10 minutes

TARGETING COOKIES

These record your visits to our website, pages you have visited and links you have followed. We may use this information to make our website and the potential advertising displayed to you more relevant to your interests. It also allows us to track the effectiveness of our advertising to ensure we are displaying relevant adverts to our audience. We may share this information with third parties for this purpose.

TYPE OF COOKIE	COOKIE NAME	PURPOSE OF COOKIE	1ST OR 3RD PARTY	TIME PERIOD
DoubleClick (TradeDesk) (Semasio)	_gads	<p>To help measure and improve our Display advertising.</p> <p>DoubleClick cookies track anonymised conversion data so that we can measure advertising effectiveness and they enable us to serve advertisements to or exclude people who have visited our website, and create lookalike audiences. The cookies also allow us to limit the number of times a person sees our advertisement.</p> <p>DoubleClick cookies sometimes include a pixel from the advertising networks we work with. This allows us to target adverts effectively on their networks.</p> <p>View the DoubleClick privacy policy at: https://privacy.google.com</p> <p>You can opt out of Google advertising at: https://tools.google.com/dlpage/gaoptout/</p>	3rd	90 days
Facebook Pixel	_fr	<p>To help measure and improve our Facebook advertising, and to show users advertising that is relevant to them.</p> <p>The tracking pixel matches users anonymously with their Facebook ID, enabling retargeting, lookalike audiences, analysis and reporting of Gables advertising campaigns. This is all used to reach the right audience and serve relevant adverts.</p> <p>For details on these cookies, please view the Facebook Cookie Policy: https://www.facebook.com/policies/cookies/</p> <p>To manage your advertising preferences on Facebook visit: https://www.facebook.com/ads/preferences</p> <p>Learn how to control the type of ads you see on Facebook at: https://www.facebook.com/help/568137493302217</p>	3rd	180 days

TYPE OF COOKIE	COOKIE NAME	PURPOSE OF COOKIE	1ST OR 3RD PARTY	TIME PERIOD
Google AdWords via Google Analytics	_gac_	To help measure and improve Google advertising. We use anonymous information from Google Analytics enabling retargeting, lookalike audiences, analysis and reporting of Gables advertising campaigns. View the DoubleClick Privacy Policy at: https://privacy.google.com You can opt out of Google advertising here: https://tools.google.com/dlpage/gaoptout/	3rd	540 days

FUNCTIONALITY COOKIES

These are used to recognise you when you return to our website so that we can personalise our content for you and remember your preferences, e.g. whether you are signed up to email alerts. We also use cookies to test website functionality.

TYPE OF COOKIE	COOKIE NAME	PURPOSE OF COOKIE	1ST OR 3RD PARTY	TIME PERIOD
Google Optimize	_gaexp	Google Optimize allows us to determine a user's inclusion in A/B testing on the Gables website.	1st	2 years
Animal Filters	Animal Filters	To recognise a user's filter options on the animal rehoming gallery pages so they do not have to repeat filter options every time they visit.	1st	Duration user is on the website

THIRD PARTY WEBSITES AND SOCIAL NETWORKS

If you click on a hyperlink from our website to any third-party websites (e.g. if you 'share' content from our website with friends or colleagues on social media), you may be sent cookies from these third-party websites. They will do so pursuant to their own policies on privacy and cookies. It's a good idea to check their privacy policies to fully understand their use of cookies.

YOUR COOKIE CHOICES

If you do not wish to use the cookies listed in this policy then you are able to turn them off. We would encourage you to keep our first party cookies enabled as they will improve your experience on our website. However, if you wish to disable cookies you are able to manage cookie permissions via your internet browser settings:

[How to manage cookies in Internet Explorer](#)

[How to manage cookies in Firefox](#)

[How to manage cookies in Chrome](#)

[How to manage cookies in Opera](#)

[How to manage cookies in Safari](#)

Your browser may also support add-ins which give you more control over how cookies are used.

You can find out more information on disabling cookies here <https://www.aboutcookies.org/>

CHANGES TO THIS POLICY AND FURTHER INFORMATION

We may update our use of cookies, and this policy, from time to time, so please check this policy regularly.

You can find out more about cookies generally and how to disable them at <http://www.allaboutcookies.org>