

KTM Pets: Privacy Policy

Effective Date: 20/01/26

Last Updated: 20/01/26

1. INTRODUCTION

KTM Pets ("we", "us", "our") is committed to protecting and respecting the privacy of our clients and website users. This Privacy Policy explains how we collect, use, store, share, and protect personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Privacy Policy applies to all personal data processed in connection with our pet care services, our website, booking systems, communications, and marketing activities.

KTM Pets operates as a sole trader. The business owner is the sole individual with access to, control over, and responsibility for all personal data processed by the business.

2. DATA CONTROLLER

Data Controller: KTM Pets

Trading Name: KTM Pets

Legal Operator: Keishia Hamilton (Sole Trader)

Contact Email: dogwalking.km@gmail.com

Contact Address: Flat 3, 20 Station Street, Ilkeston, Derbyshire, DE7 5TE

For all data protection enquiries, please contact us using the details above.

3. PERSONAL DATA WE COLLECT

We may collect and process the following categories of personal data:

3.1 Client Identity and Contact Information

- Full name
- Email address
- Telephone number
- Home address
- Emergency contact details (names, phone numbers, relationship to client)

3.2 Pet and Service Information

- Pet name, species, breed, age, weight, and identifying features

- Veterinary practice details and contact information
- Behavioural notes, training history, and care instructions
- Health-related information relevant to pet care (medical conditions, medications, allergies, dietary requirements)
- Service preferences, booking history, and scheduling information

3.3 Access and Safety Information

- Property access details (keys, codes, gate instructions)
- Security information and alarm codes
- Property layout information relevant to service delivery
- Information about other animals or persons present at the property

3.4 Financial Information

- Payment information processed through our payment provider (Wix Payments)
- Billing address
- Payment history and transaction records

We do not store full payment card details. Payment processing is handled by our PCI-DSS compliant payment provider.

3.5 Communications

- Messages sent via email, contact forms, SMS, WhatsApp, Instagram, Facebook, or other communication platforms
- Records of service-related correspondence
- Complaint records and resolution communications

3.6 Photographs and Video Content

- Photos and videos of pets taken during service provision
- Content used for service updates, records, or marketing purposes (marketing use subject to explicit consent)

3.7 Website and Technical Data

- IP address
- Browser type and version
- Device type and operating system
- Pages visited and time spent on our website
- Referring website/source
- Cookies and similar tracking technologies (see Section 12)

4. How We Collect Personal Data

We collect personal data through the following means:

- **Booking forms:** Jotform-hosted forms embedded on our website service pages
- **Website contact forms:** Forms hosted via Wix on ktmpets.com
- **Direct communication:** Email, phone, SMS, WhatsApp, Instagram, Facebook Messenger

- **Automated workflows:** Zapier integrations linking booking forms to internal record systems
- **Calendar and scheduling systems:** Booking and appointment management
- **During service provision:** Observations, notes, photos, and videos taken during pet care services
- **Website analytics:** Automated collection of technical data when you visit our website

5. Lawful Bases for Processing

We process personal data under the following lawful bases as defined by UK GDPR Article 6:

5.1 Performance of a Contract (Article 6(1)(b))

Processing is necessary to:

- Provide pet care services you have requested
- Manage bookings and scheduling
- Communicate service updates and information
- Fulfill our contractual obligations under the Service Agreement

Examples: Storing your address to access your property, recording your dog's medical conditions to provide safe care, sending you service updates.

5.2 Legitimate Interests (Article 6(1)(f))

Processing is necessary for our legitimate interests in:

- Running and managing the business efficiently
- Ensuring the safety and welfare of animals in our care
- Maintaining accurate service records
- Preventing fraud and resolving disputes
- Improving service quality
- Network and information security

We have assessed that these interests do not override your rights and freedoms.

Examples: Keeping records of behavioural notes to ensure consistent care, maintaining emergency contact information for animal welfare.

5.3 Legal Obligation (Article 6(1)(c))

Processing is necessary to comply with:

- Tax and accounting obligations (HMRC requirements)
- Insurance requirements
- Animal welfare legislation (Animal Welfare Act 2006)
- Health and safety obligations
- Regulatory and law enforcement requests

Examples: Retaining financial records for 6 years as required by HMRC, reporting animal welfare concerns to authorities where legally required.

5.4 Consent(Article 6(1)(a))

Consent is relied upon for:

- **Marketing communications:** Sending promotional emails, newsletters, or service offers
- **Public use of pet photos/videos:** Using content on social media, website, printed materials, commercial partnerships, or educational content beyond direct service updates
- **Optional services:** Any services not covered by the contract

Consent is obtained via explicit opt-in selections within our booking forms. You may withdraw consent at any time without affecting services already provided or services based on other lawful grounds.

6. How We Use Your Personal Data

We use personal data for the following reasons:

6.1 Service Delivery

- Scheduling and providing pet care services
- Accessing your property to collect and return your pet
- Following care instructions and ensuring animal welfare
- Responding to emergencies during service provision
- Communicating service updates and completion notifications

6.2 Business Operations

- Managing bookings, cancellations, and rescheduling
- Processing payments and maintaining financial records
- Maintaining client records and service history
- Ensuring continuity of care across multiple visits

6.3 Safety and Welfare

- Recording health, behavioural, and veterinary information
- Contacting emergency contacts if needed
- Reporting animal welfare concerns to relevant authorities where legally required
- Coordinating emergency veterinary care

6.4 Communication

- Responding to enquiries and booking requests
- Sending service confirmations and reminders
- Providing updates during service provision
- Resolving complaints and disputes

6.5 Legal and Regulatory Compliance

- Complying with tax, accounting, and insurance obligations
- Responding to legal requests and regulatory investigations
- Maintaining records for dispute resolution
- Complying with animal welfare legislation

6.6 Marketing (with consent)

- Sending promotional emails and service offers
- Sharing special offers or new service announcements
- Requesting reviews and testimonials

7. Use Of Photographs and Videos

Photographs and videos of your pet may be taken during service provision.

7.1 Service-Related Use (No Additional Consent Required)

Content may be used **without additional consent** for:

- Providing updates to you during or after services
- Recording evidence of service completion
- Maintaining behavioural or care notes
- Internal record-keeping

Lawful basis: Performance of contract and legitimate interests.

7.2 Marketing and Public-Facing Use (Consent Required)

Content will **only** be used for the following purposes where you have **explicitly consented** via the booking form:

- Social media posts (Instagram, Facebook, TikTok, etc.)
- Website galleries and marketing materials
- Promotional and printed materials (flyers, brochures)
- Educational and professional content (training materials, articles, presentations)
- Commercial partnerships, sponsored content, or paid promotions

Consent is granular: You can select which uses you consent to. You do not have to consent to marketing use to receive our services.

7.3 Withdrawing Consent for Marketing Use

You may withdraw consent for marketing use of photos/videos at any time by emailing dogwalking.km@gmail.com with the subject line "**Withdraw Marketing Consent**" and including:

- Your name

- Your dog's name
- The specific uses you wish to withdraw consent for

Upon withdrawal:

- We will stop using your pet's content in new marketing materials
- We will remove content from materials under our direct control (website, social media posts we can delete)
- We cannot remove content already published by third parties (shares, reposts) or incorporated into distributed printed materials

Withdrawal of consent does not affect our right to use content for service updates or legal/regulatory purposes.

8. Data Storage and Security

8.1 Where We Store Your Data

Personal data is stored using secure, password-protected systems and trusted third-party platforms, including:

- **Jotform** (UK GDPR compliant) - Booking form submissions
- **Airtable** (UK GDPR compliant) - Client and booking records database
- **Wix** (UK GDPR compliant) - Website hosting, contact forms, payment processing
- **Zapier** (UK GDPR compliant) - Workflow automation and data transfer between systems
- **Apple iCloud** (UK GDPR compliant) - Secure cloud storage for contacts, messages, photos, videos
- **Google Calendar / Apple Calendar** - Scheduling and appointment management
- **Local devices** - Password-protected Windows 11 laptop with encryption enabled

8.2 Security Measures

We implement appropriate technical and organisational measures to protect your personal data, including:

- **Access controls:** All systems protected by strong passwords and two-factor authentication where available
- **Encryption:** Data encrypted in transit (HTTPS, SSL/TLS) and at rest where technically feasible
- **Device security:** All devices password-protected with automatic locking and encryption enabled
- **Regular updates:** Software and security patches applied regularly
- **Limited access:** Only the business owner (Keishia Hamilton) has access to personal data
- **Secure disposal:** Data securely deleted when no longer required
- **Backup procedures:** Regular backups stored securely to prevent data loss

While we take all reasonable steps to protect your data, no system is completely secure. We cannot guarantee absolute security of data transmitted over the internet.

9. THIRD-PARTY DATA PROCESSORS

We use third-party service providers to support business operations. These providers act as **data processors** and only process personal data on our instructions in accordance with UK GDPR.

9.1 Data Processors We Use

Provider	Purpose	Data Processed	Location	Safeguards
Jotform	Booking forms	Contact details, pet info, service requests	USA (UK GDPR compliant via DPA)	Standard Contractual Clauses, DPA in place
Wix	Website hosting, contact forms, payments	Contact details, payment info, website usage	USA/Israel (UK GDPR compliant)	Standard Contractual Clauses, DPA in place
Airtable	Client database	All client and pet records	USA (UK GDPR compliant via DPA)	Standard Contractual Clauses, DPA in place
Zapier	Workflow automation	Client details transferred between systems	USA (UK GDPR compliant via DPA)	Standard Contractual Clauses, DPA in place
Apple iCloud	Cloud storage	Photos, videos, contacts, messages	Multiple locations (UK GDPR compliant)	Apple's Data Protection Terms

9.2 International Transfers

Some of our data processors are located outside the UK. Where personal data is transferred internationally, we ensure appropriate safeguards are in place:

- **Standard Contractual Clauses (SCCs):** Approved by the UK ICO for transfers to countries without adequacy decisions
- **Data Protection Agreements (DPAs):** Contracts with processors requiring UK GDPR compliance
- **Processor certifications:** Verified compliance with international data protection standards

We have reviewed and documented the adequacy of these safeguards. Copies of relevant DPAs are retained on file.

9.3 Processor Responsibilities

All data processors are contractually obligated to:

- Process data only on our instructions
- Implement appropriate security measures
- Notify us of data breaches
- Assist with data subject rights requests
- Delete or return data upon contract termination

10. Data Retention

Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected.

10.1 Retention Periods

Data Category	Retention Period	Reason
Active client records (contact details, pet info, service history)	Duration of client relationship	Contract performance, service continuity
Former client records	3 years after last service	Dispute resolution, insurance claims, re-engagement
Financial records (invoices, payments)	6 years after transaction	HMRC legal requirement
Marketing consent records	Until consent withdrawn + 1 year	Demonstrating compliance
Photos/videos (service updates)	3 years after last service	Record-keeping, quality assurance
Photos/videos (marketing use)	Until consent withdrawn (published content may remain visible)	Consent-based processing
Complaint records	3 years after resolution	Dispute resolution, regulatory compliance
Website analytics data	26 months (Google Analytics default)	Performance analysis

10.2 Deletion and Anonymization

When personal data is no longer required:

- **Deletion:** Data is securely and permanently deleted from all systems
- **Anonymisation:** Where data must be retained for statistical purposes, it is fully anonymised so individuals cannot be identified

You may request early deletion of your data (right to erasure) unless we have a legal obligation or legitimate interest to retain it (see Section 11.3).

11. Your Data Protection Rights

Under UK GDPR, you have the following rights:

11.1 Right of Access (Article 15)

You have the right to request:

- Confirmation of whether we process your personal data
- Access to your personal data
- Information about how we use, store, and share your data

We will provide a copy of your personal data free of charge (additional copies may incur a reasonable fee).

11.2 Right to Rectification (Article 16)

You have the right to request correction of inaccurate or incomplete personal data. We will update records promptly upon verification.

11.3 Right to Erasure / "Right to be Forgotten" (Article 17)

You have the right to request deletion of your personal data where:

- It is no longer necessary for the purposes it was collected
- You withdraw consent (for consent-based processing)
- You object to processing and there are no overriding legitimate grounds
- The data was unlawfully processed
- Deletion is required for legal compliance

We may refuse erasure where we have a legal obligation to retain data (e.g., HMRC requires 6 years of financial records) or a legitimate interest that overrides your rights (e.g., ongoing dispute resolution).

11.4 Right to Restriction of Processing (Article 18)

You have the right to request restriction (pause) of processing where:

- You contest the accuracy of the data (while we verify)
- Processing is unlawful but you prefer restriction to erasure
- We no longer need the data but you require it for legal claims
- You have objected to processing (while we assess legitimate grounds)

11.5 Right to Data Portability (Article 20)

You have the right to receive your personal data in a structured, commonly used, machine-readable format (e.g., CSV, JSON) and transmit it to another controller where:

- Processing is based on consent or contract
- Processing is carried out by automated means

11.6 Right to Object (Article 21)

You have the right to object to processing based on:

- **Legitimate interests:** You may object at any time. We must stop processing unless we demonstrate compelling legitimate grounds that override your rights.
- **Direct marketing:** You have an absolute right to object to marketing at any time.

11.7 Right to Withdraw Consent (Article 7(3))

Where processing is based on consent, you may withdraw consent at any time. Withdrawal does not affect the lawfulness of processing before withdrawal.

To withdraw marketing consent or photo/video consent, email dogwalking.km@gmail.com with subject "**Withdraw Consent**".

11.8 Rights Related to Automated Decision-Making (Article 22)

We **do not** use automated decision-making or profiling that produces legal effects or similarly significantly affects you.

11.9 How to Exercise Your Rights

To exercise any of these rights, contact us at:

Email: dogwalking.km@gmail.com

Subject line: "Data Subject Rights Request"

Include: Your name, contact details, and specific request

We will respond within **30 days** (1 month). In complex cases, we may extend this by a further 2 months and will notify you.

Requests are **free of charge** unless manifestly unfounded, excessive, or repetitive (in which case we may charge a reasonable fee or refuse).

12. Cookies and Website Tracking

12.1 What Are Cookies?

Cookies are small text files stored on your device when you visit our website. They help us understand how you use the site and improve your experience.

12.2 Cookies We Use

Cookie Type	Purpose	Duration	Third Party?
Essential cookies	Enable core website functionality (navigation, forms, security)	Session / 1 year	No
Analytics cookies (Google Analytics / Wix Analytics)	Understand visitor behavior, improve website performance	Up to 26 months	Yes (Google / Wix)
Marketing cookies (if applicable)	Track conversions from advertising campaigns	Varies	Yes

12.3 Managing Cookies

You can control cookies through your browser settings:

- **Block all cookies:** May prevent some website features from working
- **Delete cookies:** Remove existing cookies from your device
- **Browser settings:** Most browsers allow cookie management via privacy/settings menus

Browser guides:

- Chrome: Settings > Privacy and Security > Cookies
- Firefox: Settings > Privacy & Security > Cookies and Site Data
- Safari: Preferences > Privacy > Cookies
- Edge: Settings > Privacy > Cookies

Disabling cookies may affect website functionality.

To opt out of Google Analytics: <https://tools.google.com/dlpage/gaoptout>

13. Data Breach Notification

13.1 Our Obligations

In the event of a personal data breach that poses a risk to your rights and freedoms, we will:

- **Notify the ICO** within 72 hours of becoming aware of the breach (where required by UK GDPR Article 33)
- **Notify you** without undue delay where the breach is likely to result in a high risk to your rights and freedoms (UK GDPR Article 34)
- **Provide information** about the nature of the breach, likely consequences, and measures we have taken to address it

13.2 High-Risk Breach Examples

We will notify you directly if a breach involves:

- Unauthorized access to property access codes or keys
- Loss or theft of devices containing your personal data
- Ransomware, hacking, or cyber-attacks affecting your records
- Large-scale exposure of sensitive personal information

13.3 Your Responsibilities

If you become aware of any unauthorized access to your information or suspect your data has been compromised, please notify us immediately at dogwalking.km@gmail.com with subject line "**Data Breach Report**".

14. MARKETING COMMUNICATIONS

14.1 How We Market

With your consent, we may send you marketing communications including:

- Service offers and promotions
- New service announcements
- Pet care tips and advice
- Seasonal messages and greetings

Channels: Email, SMS (if consented), social media messages

14.2 Unsubscribing

You can opt out of marketing at any time:

- **Email:** Click "unsubscribe" at the bottom of any marketing email
- **Direct request:** Email dogwalking.km@gmail.com with subject "Unsubscribe from Marketing"

We will process your request within **2 business days**.

Opting out of marketing does not affect:

- Service-related communications (booking confirmations, service updates)
- Legal/regulatory communications
- Your ability to use our services

15. Children's Data

Our services are intended for adult clients aged 18 and over. We do not knowingly collect or process personal data relating to children under 18.

Emergency Contacts: All emergency contacts must be aged 18 or over as required by our Service Agreement (Clause 3.4). By providing emergency contact details, you confirm all individuals are adults aged 18+.

Household Members: Where children under 18 reside at the property where services are provided, we do not collect or process personal data about them. Our services and data collection relate solely to the adult client and their pet(s).

If we become aware that we have inadvertently collected personal data relating to a child under 18, we will delete it promptly unless we have a legal obligation to retain it.

Parental Responsibility: If you are under 18, you may not use our services or submit booking requests. All clients must be 18 or over and legally able to enter into a contract.

16. Links To Third-Party Websites

Our website may contain links to third-party websites (e.g., social media, veterinary practices, partner services). We are not responsible for the privacy practices of these sites. We encourage you to read their privacy policies.

17. Complaints and Regulatory Authority

17.1 Contact Us First

If you have concerns about how we handle your personal data, please contact us first:

Email: dogwalking.km@gmail.com

Subject: "Privacy Complaint"

We will investigate and respond within **14 days**.

17.2 Right to Complain to the ICO

You have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**, the UK's data protection supervisory authority:

Website: <https://ico.org.uk>

Telephone: 0303 123 1113

Post: Information Commissioner's Office, Wyfold House, Water Lane, Wilmslow, Cheshire, SK9 5AF

The ICO provides guidance and can investigate complaints about data protection violations.

18. Changes To This Privacy Policy

We may update this Privacy Policy from time to time to reflect:

- Changes in law or regulation
- New business practices or services
- Feedback and recommendations

How we notify you:

- Updated Privacy Policy published at <https://www.ktmpets.com/legal-info-and-policies>
- "Last Updated" date revised at the top of this document
- Where changes are significant, we will notify active clients by email

We encourage you to review this Privacy Policy periodically.

19. Contact Information

For any questions, requests, or concerns about this Privacy Policy or how we process your personal data:

KTM Pets

Data Controller: Keishia Hamilton

Email: dogwalking.km@gmail.com

Address: Flat 3, 20 Station Street, Ilkeston, Derbyshire, DE7 5TE

We aim to respond to all enquiries within **5 business days**.