1. About this Policy
   1. This Policy is to help customers of the Paws for Thought Cat Café deal with data protection matters. This should be kept alongside other policies and a copy should be given (or made available) to all staff members, volunteers and others who come into contact with personal data during the course of their involvement with Paws For Thought Cat Café.
   2. The Paws For Thought Cat Cafe (“**we”, “our”, “us”**) handle personal data about current, former, and on occasion prospective employees, volunteers, and customers of the café who book through phone or via the Paws For Thought Website.
   3. In your official capacity with the Paws For Thought Cat Cafe, we may process personal data on our behalf and we will process personal data about you internally for booking purposes or offers only. We recognise the need to treat all personal data in an appropriate and lawful manner, in accordance with the EU General Data Protection Regulation 2016/679 (**GDPR**).
   4. Correct and lawful treatment of this data will maintain in confidence and we will protect the rights of our customers or employees. This Policy sets out our data protection responsibilities and highlights the obligations of the Paws For Thought Cat Cafe which means the obligations of our employees, committee, volunteers, customers, and any other contractor or legal or natural individual or organisation acting for or on behalf of the Paws For Thought.
   5. Paws For Thought Cat Cafe is obliged to comply with this policy when processing personal data on behalf of the customers and employees.
   6. The Director Miss Emma Blyth will be responsible for ensuring compliance with this Policy. Any questions about this Policy or data protection concerns should be referred to her.
   7. Paws For Thought process employees, volunteers, customers suppliers and third party personal data for administrative and management purposes only. Our purpose for holding this personal data is to be able to contact relevant individuals/customers on business matters only which will include bookings and offers and our legal basis for processing your personal data in this way is the contractual relationship we have with you. We will keep this data for up to 24 months after the end of your official relationship with the business, unless required otherwise by law and / or regulatory requirements.
   8. All the key definitions under GDPR can be found [here](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/key-definitions/).
2. We will do the following:
   * 1. We will ensure that we only process data in accordance with our transparent processing as set out in our Privacy notice;
     2. We will only process personal data for the purposes for which we have collected it
     3. We will not ask for further information about customers bar the lead name booking.
     4. We will treat all personal data as confidential. If it is stored in electronic format then we will ensure the documents themselves will be password protected. We have also considered the security levels of any cloud storage provider. If it is stored in hard copy format then we will make sure it is locked away safely and is not kept in a car overnight or disposed of in a public place;
     5. We will not share personal data with anybody new or with a party outside the Paws For Thought Cat Café.
     6. If we thought there has been a data breach (for example you have lost personal data or a personal device which contains personal data) then we would let the relevant customer know.
3. Data protection principles
   1. When processing personal data we must comply with the enforceable principles of data protection. Personal data must be:
      1. processed lawfully, fairly and in a transparent manner;
      2. collected for only specified, explicit and legitimate purposes;
      3. adequate, relevant and limited to what is necessary for the purpose(s) for which it is processed;
      4. accurate and, where necessary, kept up to date;
      5. kept in a form which permits identification of individuals for no longer than is necessary for the purpose(s) for which it is processed;
      6. processed in a manner that ensures its security by appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage;
   2. We are responsible for and must be able to demonstrate compliance with the data protection principles listed above.
4. Fair and lawful processing
   1. This Policy aims to ensure that our data processing is done fairly and without adversely affecting the rights of the individual.
   2. Lawful processing means data must be processed on one of the legal bases set out in the GDPR. When special category personal data is being processed, additional conditions must be met.
5. Processing for limited purposes
   1. The Paws For Thought Cat Café collects and processes personal data. This is data we receive directly from an individual and data we may receive from other sources.
   2. We will only process personal data for the purposes of the Paws for Thought Cat Café as instructed by the Director. We will let individuals know what those purposes are when we first collect the data or as soon as possible thereafter.
6. Consent
   1. One of the lawful bases on which we may be processing data is the individual’s consent.
   2. An individual consents to us processing their personal data if they clearly indicate specific and informed agreement, either by a statement or positive action.
   3. Individuals must be easily able to withdraw their consent at any time and withdrawal must be promptly honoured. Consents should be refreshed every season.
   4. Explicit consent is usually required for automated decision-making and for cross-border data transfers, and for processing special category personal data.
   5. Where consent is our legal basis for processing, we will need to keep records of when and how this consent was captured.
7. Notifying individuals
   1. Where we collect personal data directly from individuals, we will inform them about:
      1. The purpose(s) for which we intend to process that personal data;
      2. The legal basis on which we are processing that personal data;
      3. Where that legal basis is a legitimate interest, what that legitimate interest is;
      4. Where that legal basis is statutory or contractual, any possible consequences of failing to provide that personal data;
      5. The types of third parties, if any, with which we will share that personal data, including any international data transfers;
      6. Their rights as data subjects, and how they can limit our use of their personal data;
      7. The period for which data will be stored and how that period is determined;
      8. Any automated decision-making processing of that data and whether the data may be used for any further processing, and what that further processing is.
   2. If we receive personal data about an individual from other sources, we will provide the above information as soon as possible and let them know the source we received their personal data from;
   3. We will also inform those whose personal data we process that we, the Paws For Thought Cat Cafe are the data controller in regard to that data, and the individual who is responsible for data protection.
8. Adequate, relevant and non-excessive processing
   1. We will only collect personal data that is required for the specific purpose notified to the individual.
   2. The Paws For Thought Cat Cafe must ensure that when personal data is no longer needed for specified purposes, it is deleted or anonymised.
9. Accurate data

We will ensure that personal data we hold is accurate and kept up to date. We will check the accuracy of any personal data at the point of each transaction. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.

1. Timely processing

We will not keep personal data longer than is necessary for the purpose(s) for which they were collected. We will take all reasonable steps to destroy or delete data which is no longer required, as per our Privacy Notice.

1. Processing in line with data subjects’ rights
   1. As data subjects, all individuals have the right to:
      1. be informed of what personal data is being processed;
      2. request access to any data held about them by a data controller;
      3. object to processing of their data for direct-marketing purposes (including profiling);
      4. ask to have inaccurate or incomplete data rectified;
      5. be forgotten (deletion or removal of personal data);
      6. restrict processing;
      7. data portability; and
      8. Not be subject to a decision which is based on automated processing.
   2. The Paws For Thought Cat Cafe is aware that not all individuals’ rights are absolute, and any requests regarding the above should be immediately reported to the committee, and if applicable escalated for guidance.
2. Data security
   1. We will take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.
   2. We have proportionate procedures and technology to maintain the security of all personal data.
   3. Personal data will only be transferred to another party to process on our behalf (a **data processor**) where we have a GDPR-compliant written contract in place with that data processor.
   4. We will maintain data security by protecting the confidentiality, integrity and availability of the personal data.
   5. Our security procedures include:
      1. **Entry controls.** Any stranger seen in entry-controlled areas should be reported.
      2. **Secure desks, cabinets and cupboards.** Desks and cupboards should be locked if they hold personal data.
      3. **Methods of disposal.** Paper documents should be shredded. Digital storage devices should be physically destroyed.
      4. **Equipment.** Screens and monitors must not show personal data to passers-by, and should be locked when unattended. Excel spreadsheets will be password protected.
      5. **Personal Devices.** Anyone accessing or processing the Paws For Thought Cat Café personal data on their own device, must have and operate a password only access or similar lock function, and should have appropriate anti-virus protection. These devices must have the Paws For Thought Cat Cafe personal data removed prior to being replaced by a new device or prior to such individual ceasing to work with or support the café.
3. Disclosure and sharing of personal information
   1. We don’t share personal data with any exterior companies.
   2. We will not share personal data with third parties or suppliers for the services they provide, and will not instruct them to process our personal data on our behalf as data processors. Where we share data with third parties, we will ensure we have a compliant written contract in place incorporating the minimum data processer terms as set out in the GDPR, which may be in the form of a supplier’s terms of service.
   3. We may share personal data we hold if we are under a duty to disclose or share an individual’s personal data in order to comply with any legal obligation, or in order to enforce or apply any contract with the individual or other agreements; or to protect our rights, property, or safety of our employees or other individuals associated with the Paws For Thought Cat Café.
4. Transferring personal data to a country outside the EEA

We will not transfer any personal data we hold to a country outside the European Economic Area (**EEA**).

1. Reporting a personal data breach
   1. In the case of a breach of personal data, we may need to notify the applicable regulatory body and the individual.
2. Dealing with subject access requests
   1. Individuals may make a formal request for information we hold about them. Anyone who receives such a request should forward it to Director Miss Emma Blyth immediately.
   2. When receiving telephone enquiries, we will only disclose personal data if we have checked the caller's identity to make sure they are entitled to it.
3. Accountability
   1. The Paws for Thought Cat Cafe must implement appropriate technical and organisational measures to look after personal data, and is responsible for, and must be able to demonstrate compliance with the data protection principles.
   2. The Paws For Thought Cat Cafe must have adequate resources and controls in place to ensure and to document GDPR compliance, such as:
      1. providing fair processing notice to individuals at all points of data capture;
      2. training committee and volunteers on the GDPR, and this Data Protection Policy; and
      3. Reviewing the privacy measures implemented by Paws for Thought Cat Café.
4. Changes to this policy

We reserve the right to change this policy at any time. Where appropriate, we will notify you by email.