PRIVACY POLICY

Policy version: November 2026

1 Introduction

This Privacy Policy is provided by Sowerberry Vets Ltd, trading as Cat Behaviour Vet, a company registered in England and Wales under company number 12098394 with registered office 167–169 Great Portland Street, 5th Floor, London, W1W 5PF ('**we**', '**our**' or '**us**') for when you make an enquiry with us, sign up to our Service Terms & Conditions, or us providing you with our services including our website (**Services**).

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on how and why we collect, store, use and share any information relating to you (your **personal data**).

It also explains your rights in relation to your personal data and how to contact us or the relevant regulator in the event you have a complaint. Our collection, storage, use and sharing of your personal data is regulated by law, including under the UK General Data Protection Regulation (**UK GDPR**).

We are the controller of personal data obtained via the Services, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

2 What this policy applies to

This privacy policy relates to your use of the Services only.

The Services may link to or rely on other apps, websites, APIs or services owned and operated by us or by certain trusted third parties to enable us to provide you with Services. These other apps, websites, APIs or services may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other apps, websites or services, please consult their privacy policies as appropriate. For more information see the section '**Who we share your personal data with**' below.

3 Personal data we collect about you

The personal data we collect about you depends on the particular activities carried out through the Services. We will collect and use the following personal data about you:

Category of data	**In more detail**
Data collected when you sign up for our services	● Your name and email address ● Your contact number ● Your address ● Your billing information, transaction and payment card or other payment method information (such as BACS transfers) ● General information about your pet and household circumstances ● Your responses to the Questionnaire
Category of data	**In more detail**

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Data collected when you make an enquiry with us	● Your name and email address ● Your contact number ● Details of correspondence via phone, email, post ● General information about your pet and household circumstances
Data collected during the services	● Your name ● General information about your pet and household circumstances ● Your responses to the Questionnaire ● Your pet's veterinary clinical history ● Your insurance information
Data collected when you use specific functions in the Services	Data you store online with us using the Services including your usage history or preferences (while such data may not always be personal data as defined at law in all cases we will assume it is and treat it in accordance with this policy as if it were)
Other data the Services collects automatically when you use it	● Your activities on, and use of, the Services which reveal your preferences, interests or manner of use of the Services and the times of use ● Your device type, IMEI numbers, MAC address of networks, other unique device identification, device operating system, mobile network information, app version number, storage usage, data usage, time zone settings

If you do not provide personal data we ask for where it is required, including the geo-localisation services, it may prevent us from providing services and/or the Services to you.

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below.

4 SENSITIVE DATA

Sensitive personal data (also known as special category data) means information related to personal data revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data; biometric data (where used for identification purposes); data concerning health; data concerning a person's sex life; and data concerning a person's sexual orientation.

Please note that we do not knowingly or intentionally collect sensitive personal data or information about criminal convictions from individuals and that you should not submit sensitive data to us.

If, however you do submit sensitive data to us, such as if you make this sensitive data available to other users of the Services (such as by publishing it through any forum feature we may make available from time to time) we will assume that you have purposefully made any such sensitive data manifestly public.

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5 How your personal data is collected

We collect personal data from you directly when you sign up to the Services, contact us directly or reach out to us via social media, make submissions via the Services when a forum element is available, or indirectly, such as your activity while using the Services.

At this point in time, we do not collect any personal information about you using cookies or similar technologies. In the event that this were to change and if we were to decide to collect personal data about you using cookies, you would be notified of this change by means of in-app notification, with detailed information regarding our use of cookies and similar technologies to be made available in the relevant cookies policy.

6 How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

(i) where you have given consent

(ii) to comply with our legal and regulatory obligations

(iii) for the performance of a contract with you or to take steps at your request before entering into a contract, or

(iv) for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services and/or the functionalities of the Services to you	To perform our contract with you or to take steps at your request before entering into a contract (in this case, the contract means the Terms and Conditions which apply to the Services)
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: ● to comply with our legal and regulatory obligations ● in other cases, for our legitimate interests or those of a third party, i.e. to protect our business, interests and rights or those of others
Communications with you not related to marketing, including about changes to our terms or policies or changes to the Services or service or other important notices	Depending on the circumstances: ● to comply with our legal and regulatory obligations ● in other cases, for our legitimate interests or those of a third party, i.e., to provide the best service to you

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What we use your personal data for	Our reasons
Protect the security of systems and data	To comply with our legal and regulatory obligations we may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests or those of a third party, i.e., to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Operational reasons, such as improving efficiency, training, and quality control or to provide support to you	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service to you
Statistical analysis to help us manage our business, e.g., in relation to our performance, customer base, app and functionalities and offerings or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you and improve and develop our app
Updating and enhancing user records	Depending on the circumstances: ● to perform our contract with you or to take steps at your request before entering into a contract (in this case, the contract means the Terms and Conditions which apply to the Services) ● to comply with our legal and regulatory obligations ● where neither of the above apply, for our legitimate interests or those of a third party, eg making sure that we can keep in touch with our customers about their accounts and new products or functionalities related to the Services and our services
To comply with our legal and regulatory obligations	Depending on the circumstances: ● to perform our contract with you or to take steps at your request before entering into a contract (in this case, the contract means the Terms and Conditions which apply to the Services) ● to comply with our legal and regulatory obligations where neither of the above apply, for our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about their accounts and new products or functionalities related to the Services and our services

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Insurance and risk management	For our legitimate interests, namely the proper protection of our business against risks
What we use your personal data for	**Our reasons**
To share your personal data with members of our group and third parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency. In such cases information will be anonymised where possible and only shared where necessary	Depending on the circumstances: ● to comply with our legal and regulatory obligations ● in other cases, for our legitimate interests or those of a third party, i.e., to protect, realise or grow the value in our business and assets

See '**Who we share your personal data with**' for further information on the steps we will take to protect your personal data where we need to share it with others.

7 Marketing

We may use email marketing to inform you of our services such as promotions.

We will always ask you for your consent before sending you marketing communications, except where you have explicitly opted-in to receiving email marketing from us in the past or except where you were given the option to opt-out of email marketing when you initially signed up for your account with us and you did not do so.

You will have the right to opt out of receiving marketing communications at any time by:

- contacting us at madeleine@catbehaviourvet.com
- using the 'unsubscribe' link included in all marketing emails you may have received from us

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see '**Your rights**' below.

8 Who we share your personal data with

We routinely share personal data with service providers we use to help us run our business or provide the services or functionalities in the Services, including developers and cloud storage providers.

We only allow service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We or the third parties mentioned above may occasionally also need to share your personal data with:

- other vets or clinical animal behaviourists to discuss your case, get some advice/assistance;
- local authorities such as RSPCA in case of a welfare concern for your pet;

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- insurance companies, as required when you have asked us to complete insurance claims for you;
- external auditors, e.g. in relation to the audit of our accounts and our company —the recipient of the information will be bound by confidentiality obligations
- professional advisors (such as lawyers and other advisors)—the recipient of the information will be bound by confidentiality obligations
- law enforcement agencies, courts or tribunals and regulatory bodies to comply with legal and regulatory obligations
- other parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

We will not share your personal data with any other third party.

9 How long your personal data will be kept

We will keep your personal data for as long as you have an active account with us and for a period of up to 6 years thereafter to comply with any accounting or legal obligations including in the event of the pursuit or defence of legal claims. Once you have closed your account with us, we will move your personal data to a separate database so that only key stakeholders in our business on a 'need to know basis' have access to such data.

Following the end of the aforementioned retention period, we will delete or anonymise your personal data.

10 Transferring your personal data out of the UK

(a) We may transfer your personal data outside the United Kingdom (**UK**) and European Economic Area (**EEA**). Where we transfer your personal data outside of the UK and the EEA, we will only do so for the purposes mentioned in this Policy and any contract that we have entered into with you or the entity that you are representing.

(b) Countries outside of the UK and the EEA do not have the same data protection laws as the UK and EEA. Therefore, when making such a transfer of data, we will always rely on a safeguard mechanism under the UK GDPR and/or the EU GDPR. We will only transfer your personal data to a country which the European Commission or the UK authorities have given a formal adequacy decision/regulation that confirms this third-country provides an adequate level of data protection similar to those which apply in the UK and EEA. If the third-country does not have an adequacy decision awarded to it, any transfer of your personal information will be subject to entering into the European Commission's Standard Contractual Clauses (the **SCCs**) which are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

(c) Transfers of personal data from the UK to the EEA shall be done on the basis of the adequacy regulation awarded to the European Union by the UK pursuant to the withdrawal of the UK from the European Union which was granted in June 2021.

If you would like further information please contact **us** using **the details provided at the end of this Policy.** We will not otherwise transfer your personal data outside of the UK and the EEA or to any organisation (or

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subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

11 YOUR RIGHTS

You generally have the following rights, which you can usually exercise free of charge. For more information regarding these rights, please visit the ICO website here.

Access to a copy of your personal data	The right to be provided with a copy of your personal data.
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data.
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations.
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data.
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.
To object to use	The right to object: ● at any time to your personal data being used for direct marketing (including profiling) ● in certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests.
Not to be subject to decisions without human involvement	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you We do not make any such decisions based on data collected by the Services.

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see 'How to contact us' below). You may also find it helpful to refer to the guidance from the UK's Information Commissioner on your rights under the UK GDPR.

If you would like to exercise any of those rights, please email, complete the online web contact form or call us - see below: '**How to contact us**'. When contacting us please:

- provide enough information to identify yourself (e.g., your full name and username) and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates

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12 Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it.

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

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

13 How to complain

Please contact us if you have any queries or concerns about our use of your information (see below '**How to contact us'**). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner.

The Information Commissioner can be contacted at https://ico.org.uk/make-a-complaint or telephone: 0303 123 1113.

14 Changes to this privacy policy

We may change this privacy policy from time to time. When we make significant changes we will take steps to inform you, for example via the Services or by other means, such as email.

15 How to contact us

You can contact us by email, via our website contact form or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

- madeleine@catbehaviourvet.com
- https://www.catbehaviourvet.com/contact
- 07466 054534 (during work hours only)

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