

## Avenue Veterinary Centre Ltd PRIVACY POLICY - Clients

### **Introduction**

Welcome to the Avenue Veterinary Centre Ltd privacy notice.

Avenue Veterinary Centre Ltd is committed to protecting and respecting your privacy when you register your pet at our practice, you will be asked for some essential information. This policy sets out how we use your personal information. This policy applies to any activity involving use of personal data for example, collecting, storing, sharing and destroying.

### **1. IMPORTANT INFORMATION AND WHO WE ARE**

### **2. THE DATA WE COLLECT ABOUT YOU**

### **3. HOW IS YOUR PERSONAL DATA COLLECTED**

### **4. HOW WE USE YOUR PERSONAL DATA**

### **5. DISCLOSURES OF YOUR PERSONAL DATA**

### **6. INTERNATIONAL TRANSFERS**

### **7. DATA SECURITY**

### **8. DATA RETENTION**

### **9. YOUR LEGAL RIGHTS**

### **10. GLOSSARY**

### **1. Important information and who we are**

#### **Purpose of this privacy notice**

This privacy notice aims to give you information on how Avenue Veterinary Centre Ltd collects and processes your personal data when you contact us, register with us, sign up to our newsletter or take part in a competition or survey.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### **Controller**

Avenue Veterinary Centre Ltd is the controller and responsible for your personal data (collectively referred to as Avenue Veterinary Centre Ltd, "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this

privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

### **Contact details**

Our full details are:

Full name of Practice: Avenue Veterinary Centre Ltd

Name or title of data privacy manager:

Email address: enquiries@avenue-vets.com

Postal address: Data Privacy Manager, Avenue Veterinary Centre Ltd, Pendennis Avenue, Staple Hill, Bristol BS16 5DW

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to the privacy notice and your duty to inform us of changes**

This version was introduced on 25<sup>th</sup> May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes your full name and any previous names, marital status, title, date of birth, gender.
- **Contact Data** includes your home address, any other addresses that you might need us to use or have, email address and telephone numbers.
- **Financial Data** includes your bank account and payment card details.

- **Transaction Data** includes all of the information that you provide to us in order to act for you and details about payments to and from you in relation to your matter.
- **Technical Data** includes your internet protocol (IP) address, any login data, your browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, information on your matters, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We collect **Special Categories of Personal Data** if it is reasonably necessary for us to have that information.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform our services to you, but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Instruct us to act on your behalf;
  - create an account on our website;
  - subscribe to our publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

### **Third parties or publicly available sources.**

We may receive personal data about you from various third parties and public sources to verify your identity and address details. This information also tells us if clients are company directors, politically exposes persons, whether they have county court judgements against them, whether they are currently insolvent and whether they are on the UK Government Sanctions list. We are required to carry out such checks by our regulatory bodies.

### **4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where you have consented to us using your information.

Generally we do not rely on consent as a legal basis for processing your personal data. If we have asked for your consent it is likely to be for marketing purposes. If you have given us consent you have the right to withdraw consent at any time.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new client	(a) Identity (b) Contact	(a) Performance of a contract with you  (b) Complying with our legal and regulatory obligations
To deliver our services to you including manage payments, fees and	(a) Identity (b) Contact	(a) Performance of a contract with you  (b) Complying with our legal

charges and collecting and recover money owed to us	(c) Financial (d) Transaction (e) Marketing and Communications	and regulatory obligations  (c) Necessary for our legitimate interests (to provide relevant and targeted updates and information to you, to recover debts due to us, etc.)
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy  (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you  (b) Complying with our legal and regulatory obligations  (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you  (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Complying with our legal and regulatory obligations
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

	(f) Technical	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or you have instructed us to provide services to you and, in each case, you have not opted out of receiving further communications.

### **Third-party marketing**

We have no proposals to share your personal data with any other company for marketing purposes but we will get your express consent if we do.

### **Opting out**

You can ask us or third parties to stop sending you marketing communications at any time by following the opt-out links on any marketing message sent to you.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the

processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We routinely share standard personal information with the following organisations, where necessary, to enable us to carry out every day functions necessary to fulfil what is expected of us. We will only share the minimum amount of personal information which is necessary.

- External laboratories
- Referral centres
- Petlog, and other microchip database holders
- Other practices, you may wish to be transferring to or obtaining second opinions
- Insurance companies
- Charitable trusts & rescue centres (for the purpose of financial and other support)
- Kennels & catteries (for the purpose of medical help during stay)
- Organisations that are providing personalised merchandise you have ordered
- Simplyhealth when joining our pet health scheme
- Debt agencies, if you default on our payment terms
- APHA (export)
- Various pharmaceutical organisations (where offers have been undertaken)
- Pharmaceutical organisations for written prescription requests
- External mail facilities such as Mail Chimp, Survey Monkey, TextLocal, Chameleon, Virbac and Zoetis, solely for our purpose for items such as reminders and other marketing activities. Your details are never sold or used for any other purpose.
- Cremation services

We routinely share extended personal information with the following, where necessary, to enable us to carry out every day functions necessary to fulfil what is expected of us;

- Simplyhealth when setting up health plans
- Insurance companies
- PDQ payment machine (when collecting payment electronically via debit & credit cards) – rest assure, we are continually compliant with Payment Card Industry Data Security Standard (PCI DSS).
- Our insurers in relation to potential claims against us;
- Our regulatory bodies;

- If ordered to do so by a Court or Tribunal;
- To our IT service providers and other providers of system administration services; or
- To third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

We do not currently transfer your personal data outside the European Economic Area (**EEA**). If this position changes during the course of us providing services to you we will let you know.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## **8. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 7 years after they cease being customers for tax purposes.

We may need to keep some Transaction Data for much longer.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data including the right to:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

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.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your

consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **YOUR LEGAL RIGHTS**

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). 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 data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. 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 at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.