

PRIVACY NOTICE FOR Bush House Vet Clients

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our clients, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to current clients and former clients (active within last 7 years), and contractors.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes, data collected is adequate, relevant and limited to what is necessary for the purposes of processing for the contractual fulfilment of Provision of Animal Care both emergency and preventative. Legitimate interest of Bush House Vet Group
- c) Personal data will be stored for the duration of active use of Bush House Vet Group and upto the life of your pet following client's use of Bush House Vets.
- d) data is kept accurate and up to date (clients able to make changes to data via website). Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data
- h) We do not collect or use personal data for any purpose other than that stated clearly at the point of collection.

B) TYPES OF DATA HELD

We keep necessary personal data on our clients in order to carry out effective and efficient provision of care for your pet. We keep this data in a password protected database system. Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers, email address.

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during the registration period and subsequently upon the visits to your branch.

In some cases, we will collect data about you for third parties, such as our database provider for the purpose of reminders for appointments/boosters and relevant pet health information or news items. If you wish to opt out of receiving marketing information, this can be done by informing your local branch or emailing info@bushhousevetgroup.co.uk

Personal data is kept in password protected IT systems.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to give effective care of your pet.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carry out the Processing of Insurance claims	Performance of the contract
Applying necessary discounts for Pet Health Plans	Performance of the contract
Carry out the processing of Laboratory testing of samples	Performance of the contract
Carry out referrals to referral practice	Performance of the contract
Carry out processing of support to pet with specific charities: RSPCA/Dogs Trust/Cats Protection/PDSA	Performance of the contract
Retention of Records for up to the life of pet + 1 year for *VMD/VDS compliance.	Our legitimate interests
Making use of messaging service for appointment and booster reminders and relevant promotions	Our legitimate interests
Sending information to alternative vet practice should a request come in for your animal history	Our legitimate interests/portability
Maintaining relevant up to date records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained.	Our legitimate interests
Dealing with legal claims against us, fraud prevention	Our legitimate interests
Use of IT servicing of data systems	Our legitimate interests
Use of external debt collection agency	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests

Data is shared with third parties for the following reasons:

- For the administration of appointment reminders, booster reminders, insurance processing, case review/opinion.
- Non payment of invoices within specified time, we use the services of a debt collection agency.

We may also share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

E) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Reviewed Jan2020

F) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your use of Bush House Vets and/or up to the life of your pet + 1 year beyond unless requested otherwise. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

Record	Retention Period
*Vet Medicines Directorate : for the retail supply (incl administration) of POM-V and POM-VPS medicines	5 Years
Veterinary Defence Society : for professional indemnity purposes	Life of Pet + 1 year

G) CLIENT RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed "Access to Data" below
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

H) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data unless there is a legitimate interest.

I) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

J) DATA PROTECTION COMPLIANCE

Our Data Protection Manager is:

_____ Fran Wynne _____
_____ info@bushhousevetgroup.co.uk Contact details).

*VMD/VDS: Veterinary Medicine Directorate / Veterinary Defence Society