

## **PRIVACY NOTICE FOR ElizaVet**

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, and your rights regarding your data. This notice applies to current clients, former clients (active within the 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. The data collected is adequate, relevant, and limited to what is necessary for the purposes of processing for the contractual fulfillment of Provision of Animal Care, both emergency and preventative, and the legitimate interest of ElizaVet.
- c) Personal data will be stored for the duration of active use of ElizaVet and up to the life of your pet following the client's use of ElizaVet.
- d) Data is kept accurate and up to date. Clients are able to make changes to data via the website. Data found to be inaccurate will be rectified or erased without delay.
- e) Data is not kept for longer than necessary for its given purpose.
- f) Data is processed in a manner that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage, by using appropriate technical or organizational measures.
- g) We comply with the relevant GDPR procedures for the international transfer 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, and 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 from 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@elizavet.co.uk](mailto:info@elizavet.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 to 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 organizational 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.

#### F) RETENTION PERIODS

We only keep your data for as long as we need it, which will be at least for the duration of your use of ElizaVet and/or up to the life of your pet + 1 year beyond, unless requested otherwise. Some data retention periods are set by 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).

#### **J) DATA PROTECTION COMPLIANCE**

Our Data Protection Manager is:

Dario Ambrogio  
info@elizavet.co.uk