Privacy Policy 1st March 2022

BACKGROUND:

Ebor Veterinary Services (trading as Leeds Veterinary Centre) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Ebor Veterinary Services, trading as Leeds Veterinary Centre.

A Limited Company registered in England under company number 11966652.

Registered address: Calyx House, South Road, Taunton, United Kingdom, TA1 3DU.

Main trading address: 133-137 Green Lane, Crossgates, Leeds, LS15 7DR

VAT number: 323015358.

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What Is Personal Data?

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always

- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling: we do not use your personal data in this way

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 11.

5. What Personal Data Do You Collect and How?

We may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data or personal data relating to children or data relating to criminal convictions and/or offences

Data Collected	How We Collect the Data
Title, first and surname	Online, by telephone or in person in the practice as part of registering to be a client
Address	Online, by telephone or in person in the practice as part of registering to be a client
Telephone numbers – landline, mobile and workplace if you chose to provide it	Online, by telephone or in person in the practice as part of registering to be a client
Email address	Online, by telephone or in person in the practice as part of registering to be a client

Pet name, breed, age, sex and neutering status, microchip number	Online, by telephone or in person in the practice as part of registering to be a client
Pet insurance policy details including policy number	Online, by telephone or in person in the practice as part of registering to be a client or when you request we claim on your insurance policy
Previous veterinary practices you have attended with pets currently registered with us and their medical histories	Online, by telephone or in person in the practice as part of registering to be a client

6. How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we will use your personal data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering your account as a client	Telephone numbers, email address and postal address	To administer your account and provide the products and services you have requested from us. For example, invoicing, calling to change an appointment and to keep a record for legal and accounting purposes.
Send you health care communications about your pet	Telephone numbers, email address and occasionally postal address	We will send our clients reminders for their pet's vaccinations and when other healthcare is due including preventative and medical treatments to help with the well-being of their pets. Clients find these communications useful in administering care to their pets. They are only sent to existing clients who can opt-out at any time by calling or emailing the practice directly.
Contact you as part of a client-wide communication	Email address, mobile phone number	To inform you of service information about the practice, for example our opening times during public holidays or disruption of our services due to extreme weather conditions.
Pass your contact details and pet's history and clinical records on to another veterinary practice or referral centre	Name, address, telephone number and email address. Your pet's details, medical history and test results including ultrasound and x-rays	After first seeking your permission, we will liaise with another veterinary practice as part of your moving practices, seeking a second opinion or taking your pet to a specialist referral centre.
Pass your pet's history and clinical records to your insurance company	Your pet's details, medical history and test results including ultrasound and x-rays.	We will pass on your pet's clinical history with your name and address to your insurance company to allow them to process your claim.
Pass basic personal details and your pet's	Surname, address, pet's name, details and	If we take samples from your pet, we send the sample to an external laboratory and provide

details (including clinical history if needed) on to our external veterinary laboratory	clinical history if necessary.	your surname and address for identification purposes only.
Pass your pet's name and your surname on to our pet cremation service if your pet is to be cremated with them.	Pet name, your address and surname.	If you choose to have your pet cremated after they have passed away, we will provide the crematorium with your surname and address, as well as your pet's name, for identification purposes only.
Register your pet's microchip with the chip provider	Title, full name, address, contact telephone numbers and email address.	Should you wish to chip your pet we register your and your pet's details with the chip provider. Note that chipping dogs is a legal requirement and we share your personal data in this case under a legal obligation to do so.
Set up a direct debit with a third-party provider to administer our Healthcare Plan	Title, full name and address, bank account details, pet name, species, age.	If you decide to purchase our healthcare plan and pay by direct debit, you will also need to provide bank account details to set up and confirm your direct debit. We do not retain this information once your direct debit is confirmed.
Ask a third-party provider to collect your contact details for online appointment booking	Title, full name, address, contact telephone numbers and email address. Your pet's details.	If you choose to book an appointment online you will be asked for your contact details and pet's details to enable registration on to our computer system or to link to your existing account with us to book an appointment online.

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes from Leeds Veterinary Centre only, which may include contacting you by email, text message or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

Leeds Veterinary Practice will not pass on your personal data to any third parties without your consent unless the law requires us to do so. We do not provide any personal data to the suppliers of

the medicines we administer or the pet care products we sell.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods.

Leeds Veterinary Centre is required to retain information in accordance with the law, such as information needed for income tax and audit purposes.

In order to comply with our professional liability insurance, we keep and securely store past clients records for seven years. This includes full name, address, email address and telephone number, but excludes bank account details.

We will only process your personal data whilst you are a client. After two years of inactivity, we will email or call clients to prompt them to see if they wish to remain as a client. After two years and six months, we will write to or call clients again. If there has been no activity for three years and no response to our enquiries we will close the client's account and archive the data.

8. How and Where Do You Store or Transfer My Personal Data?

We will store some of your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

We will some of your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA from the UK are permitted without additional safeguards.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so;

9. **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes other than those laid out in section 6 above, subject to the following exception.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within two weeks and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

Email address: info@leedsvets.com.
Telephone number: 0113 531 6600

Postal Address: 133-137 Green Lane, Crossgates, Leeds, LS15 7DR.

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website and as a hard copy from the practice. This Privacy Notice was last updated on 18th June 2022.