

# GDPR Client Privacy Notice

## What is the purpose of this document?

Maes Glas Vets Ltd is committed to protecting the privacy and security of your personal data.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all clients of Maes Glas Vets Ltd.

Maes Glas Vets Ltd is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former clients. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read this notice so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

## Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## The kind of information we hold 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).

There are "special categories" of more sensitive personal data which require a higher level of protection, such as information about your health.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and email addresses.
- Financial details.

## How we will use information about you

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

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. 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.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest [or for official purposes]

### **Situations in which we will use your personal information and the lawful basis for processing it**

The lawful basis for processing the data will be one or all of the following:

**Contract:** the processing is necessary for the contract we have with you, the client.

**Legitimate interests:** the processing is necessary for our legitimate business interests.

**Consent:** you have given clear consent for us to process your personal data for a specific purpose.

**Legal Obligation:** the processing is necessary for you to comply with the law

The situations in which we will process your personal information are listed below.

- To register you as a new client or updating existing client details including name, address, telephone numbers, email addresses – **Contract**
- To manage payments, fees and charges including collecting and recovering money owed to us – **Contract, Legitimate Interests.**
- To manage our relationship with you including:
  - Notification of any changes to our terms and conditions or to our privacy policy – **Legal Obligation.**
  - Surveys and reviews of our services – **Legitimate Interests**
  - Data analytics to assist with improvement or changes to our website and/or social media and our relationship with you – **Legitimate Interests**
- To ensure that you receive recommendations or suggestions appropriate for the health of your pet e.g. vaccination reminders – **Legitimate Interests**
- To ensure that you receive the service to which you have consented – **Consent, Contract, Legitimate Interests:**
  - External laboratory testing
  - Insurance
  - Referrals
  - Pet Health plans
  - Microchipping
- Business management, planning and protection including auditing, accounting, data analysis, system maintenance, IT support, data hosting, reporting and troubleshooting – **Legitimate Interests, Legal Obligation.**

### **Marketing Communications**

You will only receive marketing communications from us if you have:

- agreed to receive marketing communications from us by giving us specific consent to do so by opting in.

- Purchased goods or services from us.

### **Change of purpose**

We will only use your personal information 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Data sharing**

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We do not transfer personal information outside the EU.

### **Why might you share my personal information with third parties?**

We will share your personal data with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

### **Which third-party service providers process my personal information?**

- Service providers who provide IT and administration services.
- Professional advisers including lawyers, auditors and insurers.
- HMRC, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Debt management agencies.

### **How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Data security**

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

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

## **Data retention**

### **How long will you use my information for?**

We will only retain your personal information 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

### **Rights of access, correction, erasure, and restriction**

#### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes by contacting us directly, as per contact details at the end of this document.

#### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Practice Manager in writing.

#### **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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent

for that specific processing at any time. To withdraw your consent, please contact the Practice. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. Our contact details

Email address: **[enquiries@maesglasvets.co.uk](mailto:enquiries@maesglasvets.co.uk)**

Head office postal address: **Maes Glas Vets Ltd, Church Acre, Brackla, Bridgend, CF31 2JT**

Telephone: **01656 652751**

If you are unhappy with any aspect of how we collect and use your data, you have the right to complain either directly to ourselves or if you prefer to the Information Commissioner's Office (ICO) ([www.ico.org.uk](http://www.ico.org.uk)).