

**GDPR Privacy Policy**

Avonvale Veterinary Practice Ltd., is committed to protecting and respecting your privacy, delivering high quality customer service and the high standard for data privacy, security and transparency introduced by the new European data protection law known as the **General Data Protection Regulation**(GDPR).

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be used, stored, processed, and/or transferred by us.  Please read the following carefully to understand our practices regarding your personal data and how we will treat it and your rights with respect to it.

For the purposes of the General Data Protection Regulation, the data controller is Avonvale Veterinary Practice Ltd, a company incorporated in England & Wales with registered number 04791087.

Storage of your data:

All personal data is stored on our Practice Management System, Eclipse, held electronically on secure servers and our network has firewalls together with data back-up for protection and recovery.

**The data we hold;**

Avonvale Veterinary Practice requests only the information we need.

**Why do we collect the information?**

The data we store is used in order to provide you with a comprehensive veterinary service. Your details are registered on our Practice Management system for internal record keeping and clinical governance, to communicate with you in connection with your animal(s) health, to record your animal(s) health and treatment history and apply relevant fees, to communicate for administrative purposes and to provide you with healthcare tips and advice and changed within our practice.

We may use your date to provide annual vaccinations reminders, appointment notifications, to advise you of upcoming events such as client events and for sending you our informative newsletters, offers and promotions.

**The date we collect includes:**

**Personal data you give us.**

This is data about you that you give us by filling in forms or by corresponding with us by phone, e-mail, in person or otherwise. It includes data you provide for the purposed of providing our services to you, when you use our services, register with us, subscribe to our services, subscribe to receive information from us, participate in social media functions on our website or on our social media sites, enter a competition, promotion or survey, interact with our accounting and fee-paying systems. The data you give us may include your name, address, e-mail address and phone numbers, names and details of animals owned by you or in your care, yard address and contacts, details of other service providers and referring vets that you interact with, insurance details and other information pertinent to the provision of our services.

**Personal data we collect about you.**

With regard to each of your visits to our website we will automatically collect the following information:

* technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and geographical location;
* analytical information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), services and products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and device type.

**Personal data we receive from other sources.**

This is data we receive about you from referring vets or other service providers. This data may include your name, address, e-mail address and phone numbers, names and details of animals owned by you or in your care, details of other service providers and referring vets that you interact with, insurance details and other information pertinent to the provision of our services.

**How we would use this data**

We need these details to set you up on our Practice Management system as a client. We use your home address so we can post invoices, your phone numbers so we can get hold of you and an email to send invoices if you prefer.

From time to time we send out newsletters and would use the postal address or email we have on our database. To receive marketing information from Avonvale Veterinary Practice Ltd., you need to opt-in by telling a member of staff via email, over the phone or on-line at the time of registration.  You can opt out of this at any point by emailing or calling reception.

We will not disclose your personal data to any company outside Avonvale Veterinary Practice Ltd., except to help prevent fraud, or if required to do so by law.

**Using your personal data**

**Personal data you give to us:**

We will use personal data you give to us:

* to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
* to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
* to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this;
* to notify you about changes to our service, our terms and conditions or our policies;
* to ensure that content from our website is presented in the most effective manner for you and for your computer.

**Personal data we collect about you:**

We will use this data:

* to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
* to improve our website to ensure that content is presented in the most effective manner for you and for your computer;
* to allow you to participate in interactive features of our service, when you choose to do so;
* as part of our efforts to keep our website safe and secure;
* to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;

**Data we receive from other sources:**

We will combine this data with data you give to us and data we collect about you. We will use this data and the combined information for the purposes set out above (depending on the types of data we receive).

Avonvale Veterinary Practice Ltd., will not share your information for marketing purposes.

**Our Legal Basis for Processing Your Personal Data**

We need to process your personal data so we can provide you with Veterinary Services.  We will also send vaccination reminders via text message to help you keep your horse’s vaccinations up to date.  With your permission we send out newsletters and information directly relating to Avonvale Veterinary Practice Ltd.

* It is necessary for us to process your personal data for performance of the contract between us in relation to the services you have asked us to provide.
* In certain circumstances, we process your personal data after obtaining your consent to do so for the purposes of:
	+ sending you marketing communications, inviting you to events and professional development courses, keeping you informed of Practice news and notifying you of changes within the Practice.

When we rely on our legitimate interests in order to collect and use your personal data including for the purposes of automated decision making and profiling as set out in *Automated decision making below*, we must consider whether those legitimate interests are overridden by your interests or your fundamental rights and freedoms. We may continue only if we decide that your interests, rights and freedoms do not override our legitimate interests.

We have considered these matters, and where we think there is a risk that one of your interests or fundamental rights and freedoms may be affected we will not use your personal data unless there is another legal basis for us to do so (either that it is necessary for us to perform our contract with you, or on the basis of your consent).

**Automated decision making**

Some decisions within the Practice are made automatically depending on the information you provide or we collect from you. The information may relate to:

* Your normal veterinary surgeon
* Your type of animal (for example Thoroughbred, Sports horse etc).
* Your location
* Clubs and associations you have told us about

**Cookies**

Our website uses cookies to distinguish an individual from other users of our website. This helps us to provide each individual with a good experience when browsing our website and also allows us to improve our website**.**For detailed information on the cookies we use and the purposes for which we use them see our Website use and Cookie policy.

**How long we keep your personal data**

We will keep your personal data as set out below, or as necessary for conducting the business of providing the services to you and completing any contract with you:

* In accordance with the requirements and recommendations of HM Revenue and Customs.
* In accordance with the requirements and recommendations of the Royal College of Veterinary Surgeons (RCVS)
* In accordance with the requirements and recommendations of the Veterinary Defence Society (VDS).

In most part, we store data for a period of 7 years, unless otherwise stated above.

**Disclosure of your personal data**

You agree that we have the right to share your personal data with:

* Selected third parties including:
	+ Veterinary surgeons, business partners, suppliers and sub-contractors who act on our behalf for the performance of any contract we enter into with you or for the purpose of communicating with you;
	+ Analytics and search engine providers that assist us in the improvement and optimisation of our website.

We will disclose your personal data to third parties:

* In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
* Avonvale Veterinary Practice Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
* If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of business and other agreements; or to protect the rights, property, or safety of Avonvale Veterinary Practice Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We may share your information with the following;

* Your Insurance Company, if you make a claim.
* Other Veterinary practices, if you ask us for history transfer or ask for a referral.
* Debt collection companies, if you default on payments.
* Care free credit, if you request this service.
* External consultants, if your horse needs to see a consultant.
* Governing bodies, if your horse is treated at an affiliated event for example.
* Racecourses, if you have a horse treated whilst racing.
* Horse Passport issuing authorities.
* External Laboratories.

**Your Rights,**

The new GDPR regulations mean that your rights have changed.  We have listed below these rights and how they affect you. The various rights are not absolute and each is subject to certain exceptions or qualifications.

The Right To Be Informed

* You have the right to know how we collect and use your data.
* We only ask for data which we need to conduct our business.
* You have the right to know who we might share your details with.

The Right Of Access

* You have a right to obtain access to your personal data free of charge, except where your requests are manifstly unfounded or excessive, particularly if it is repetitive, in which case we may charge a reasonable fee or refuse to respond. If we refuse we will explain to you why.
* If you would like to see the details we hold for you please call or email us.  We will make sure that this is sent to you within one month of the request.

The Right To Rectification

* Should you notice that any of the data we hold for you is incorrect we will rectify the details as soon as practicable and notify any organisations to which we might have sent details. If we refuse to rectify your personal data, we will write to explain why.

The Right To Erasure

* This is also known as the right to be forgotten. This is not a general right to erasure; it only applies in these specific circumstances:
	+ The personal data is no longer necessary in relation to the purpose for which it was original collected;
	+ When you withdraw consent;
	+ When you object to the processing of your personal data and there is no overriding legitimate interest to continue the processing;
	+ The personal data was unlawfully processed;
	+ The personal data has to be erased in order to comply with a legal obligation; and
	+ The personal data is processed in relation to the offer of information society services to a child.
* In addition there are exceptions which include where the personal data is processed for the following reasons:
	+ To exercise the right of freedom of expression and information;
	+ To comply with certain legal obligations;
	+ For public health purposes; and
	+ Exercise or defence of legal claims.
* You can ask to be removed from the system, however Veterinary regulations state that we must keep records for 6 years.  After this time the records can be destroyed.

The Right To Restrict Processing,

* If you ask us to, we will then not use your information to contact you, but we will still need to store the information as required by our regulations,

The Right To Object

* You can object to the use of your data for marketing, but we do need to store your records for 6 years.

The Right to Lodge a Complaint

* You have the right to lodge a complaint about the way we handle or process your personal data with the Information Commissioner’s Office. Rights In Relation To Automated Decision Making And Profiling.

The Right to Withdraw Consent

If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

**Where we store your Data**

Personal Data is stored securely on the Avonvale Veterinary Practice server.  Documents are stored securely within the clinic.

**Consequences of Failing to Provide personal Data**

If you do not provide us with your personal data we may not be able to provide you with the veterinary services you require.  Please talk to our Practice Manger about this if you have concerns.

**Changes to our Data Protection Policy**

Avonvale Veterinary Practice Ltd’s Data Protection Policy is amended and updated from time to time.  The most up to date policy can be found on our website.

**Contact us about Data Protection**

Any questions or queries you have about Avonvale Veterinary Practice’s Data Protection Policy should be addressed to the Practice Manager via email using reception@avonvaleequine.co.uk .  This is also the best way to update your contact details or make any changes to your account.

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