

Privacy notice for customers

Introduction

The Anglesey Pet Clinic respects your privacy and is committed to protecting your personal data. This privacy notice will tell you about your privacy rights, how the law protects you, and will inform you as to how we look after your personal data. Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

It is important that you read this privacy notice together with any fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

Controller

The Anglesey Pet Clinic Limited is the controller and responsible for your personal data (collectively referred to as "Anglesey Pet Clinic", "we", "us" or "our" in this privacy notice).

Contact details

Anglesey Pet Clinic Limited (registered in England and Wales under company number 6030097; Registered Office: Anglesey Pet Clinic, Cyttir Road, Holyhead, LL65 2SY, Tel: 01407 764999).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Links to third-party websites

Our website may include links to third-party websites. Clicking on those links may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

1. The data we collect 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data including first name, last name, marital status, title
- Contact Data including billing address, email address and telephone numbers.
- Pet Data including the name, species, breed, gender, neutering status, colour, microchip/tattoo details, insurance records and medical history of your pet(s).
- Financial Data including payment card details.
- Transaction Data including details about payments to and from you and other details of products and veterinary services you have purchased from us.
- Profile Data including purchases or orders made by you.
- Usage Data including information about how you access and use our website or Facebook site.
- Marketing and Communications Data including your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) without your express permission. Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or veterinary services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

2. How is your personal data collected?

We collect data from and about you through direct interactions. You may give us your Identity, Contact, and Pet data by filling in forms or by corresponding with us by post, phone, email or in person. This includes personal data you provide when you:

- register with our practice;
- request our products or services;
- enter a competition, promotion or survey; or
- give us some feedback.

As you interact with our website, we may automatically collect anonymised Technical Data about your browsing patterns using Google Analytics. Google allows you to opt in or out of this facility.

3. How we use your personal data

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

- Where we need to perform the contract for the delivery of veterinary services we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.

Please refer to the Glossary to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us by phone on 01407 764999](#).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (c) Pet	Performance of a contract with you
To process payments for products and services we provide to you, including: (a) Managing payments, fees and charges (b) Collecting and recovering money owed to us	(a) Identity (b) Contact (c) Pet (d) Financial (e) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include:	(a) Identity (b) Contact	(a) Performance of a contract with you

<p>(a) Notifying you of treatments that your pet is due, or which may be beneficial to your pet</p> <p>(b) Notifying you about changes to our terms or privacy policy</p>	<p>(c) Pet</p> <p>(d) Profile</p>	<p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Profile</p> <p>(e) Usage</p> <p>(f) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about products or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Pet</p> <p>(d) Technical</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

	(e) Usage (f) Profile	
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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need for your pet(s), or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us and have opted-in to receiving that marketing.

Third-party marketing

We do not share your personal data with any other company for marketing purposes.

Opting out

You can ask us to stop sending you email or SMS marketing messages at any time or adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Change of purpose

We will only use your personal data for the purposes for which we collected it.

4. Disclosures of your personal data

- We may have to share your personal data with the parties set out below for the purposes set out in the table above.
- External Third Parties as set out in the Glossary.
- Specific third parties such as Animana, Chameleon, IDEXX Laboratories, referral veterinary practices, Debt collection, pet crematorium, insurance companies, other veterinary practices
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- 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.

- To inform you by email of service information about the practice. For example, notification of seasonal opening times or changes to out of hours availability.
- If you have pet insurance and you wish to make a claim, 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.
- If we take blood or tissue samples from your pet, we will send the sample to one of our contracted laboratories and provide your surname and pet's name for identification purposes only.
- In the event of your pet passing, should you choose to take up one of the crematorium options that are available, we will send your pet to our trusted crematorium, along with your surname, pet's name and contact details.
- It may occasionally be necessary to provide access to this data to our software provider, Animana, when support issues arise with our practice management system.
- If you would like your pet to be referred to a specialist veterinary surgeon, we will provide them with your pet's clinical history with your name and address to enable them to confirm your referral appointment.
- Should you wish to move to an alternative veterinary surgery, we will provide your pet's clinical history with your name and address to your new vets before closing your account.

Should you wish to microchip your pet (cats and rabbits), we will register your name, address and contact number with the microchip provider. Note that microchipping dogs is a legal requirement and we share your personal data in this case under a legal obligation to do so.

5. Opting-out of electronic marketing message

You can opt-out of receiving marketing messages from us by:

- Dropping into the surgery and speaking to a member of our team.
- Clicking the 'Unsubscribe' link in any marketing communications email.
- Clicking the 'opt-out' link in any marketing communication by SMS

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

7. Data security

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

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

8. Data retention

We will only retain your personal data 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.

We keep basic information about our customers (including Contact, Identity, Pet, Financial and Transaction Data) for seven years after they cease being customers for legal and tax purposes.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers [acting as processors] based in the United Kingdom who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in England or Scotland who provide consultancy, banking, legal, insurance, debt and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.