# **Privacy Policy Summary:**

At Stoley's Vets, we take your privacy seriously. This policy outlines how we collect, use, and protect your personal data in compliance with the UK GDPR and the Data Protection Act 2018.

## Key points include:

- Data We Collect: Your name, contact details, pet health records, payment information, and any data required to provide veterinary services.
- Why We Process Data: To deliver veterinary care, process payments, communicate with you, and comply with legal obligations.
- Your Rights: You can request access, correction, deletion, or restriction of your data.
- Data Retention: We retain records as required by veterinary regulations and legal obligations.
- Data Sharing: We do not share client data with third parties unless legally required.
- Cookies: Our website uses minimal cookies for essential functionality and analytics.



# What is included in this Notice?

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# **Privacy policy**

## 1. Who we are:

We are the controller responsible for the processing of your personal data pursuant to the UK General Data Protection Regulation and UK Data Protection Act 2018, with the following details:

Independent Great Oakley Vets Limited (Trading name Stoley's Vets)

Registered office: 3 Parry Drive, Corby, NN18 8TP

UK Companies House registration number: 14869985

Vat Number: GB457738644

#### 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.

## 4. What Are Your/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 contact us to find out more or to ask any questions using the details in Part 13.
- b) The right to access the personal data we hold about you.
- 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 13 to find out more.
- d) The right to be forgotten, i.e. the right to ask to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 13 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 using 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 13.

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 if 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 13.

#### 5. What Personal Data Do We Collect and How?

We may collect and hold some or all 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 AND/OR personal data relating to children AND/OR data relating to criminal convictions and/or offences.

Use of Personal Data	Type of Personal Data Used	How we collect data	Legal Basis for processing
Provide the Services, including veterinary services and products to you including results of tests, treatment and providing emergency care.	Title, name, address, phone number, email address, name of your spouse or partner (if co-owner of pet) or pet handler or others authorised to make decisions for your pet, preferred vet practice and information about your use or interaction with the Services.	Directly from you and/or from a veterinary practice (for example, where your pet is referred to us from another practice).	Performance of Contract
If requested by you, register your pet to a Health care plan and provide such plan.	Title, name, email address, phone number, address, preferred vet practice, payment card details and direct debit preferences.	Directly from you.	

Use of Personal Data	Type of Personal Data Used	How we collect data	Legal Basis for processing
Obtain payment for the provision of our Services.	Financial and billing Information such as your name, address, email address, bank and card details.	Directly from you.	Legal obligation
Provide you with website functionality and other content, including to allow you to register and maintain your account with us (where applicable).	Name, email address, information about your use or interaction with the Website, log in details and account details (where applicable).	Directly from you.	
Provide you with service messages by phone, SMS or email to remind you of appointments, inform you about security, privacy or administrative related matters including your pet's health, for example vaccinations, health or wellness checks, general advice on behaviour or disease prevention (these communications are not marketing orientated, and we do not rely on consent). Sometimes, we rely on trusted third parties to conduct such service calls or messages on our behalf.	Name, phone number, email address and information about the Services you have used or requested.	Directly from you.	

Register pet microchip and identify pet owners from information associated with pet's microchip (for example, to reunite a lost pet with their owner).	Name, phone number, email address and regional location.	Directly from you or from the pet microchip databases.	Legal obligation
Administer the website and Services, conduct troubleshooting, data analysis, testing, research, statistical and survey analysis.	Name, contact details, data about your use of the website and Services, data about products and Services provided to you, recordings of your calls or online chat with our customer service staff.	Directly from you (in some cases, automatically, when you use the website).	Legitimate Interest to run a successful and efficient business and to ensure legal protection, safety of all premise users and security of property.
Improve our Services to you and other clients, including by gathering feedback from you via surveys and analysing personal data about your use of our Services.	Name, email address, phone number, information about the use and interaction with our Services, recordings of your calls with our customer service staff.	Directly from you.	
Develop, train and deploy our tools and systems - including through artificial intelligence and machine learning – for the purposes of improving our Services through, for example, the use of chatbots (where relevant), diagnostic analytics and fraud detection features. We may also anonymise personal data for Al training purposes.	Name, contact details, data about your use of our Services.	Directly from you.	

Maintain the safety and security of our users, our clients, our staff, the animals in our care, our property and premises, our Services and business.	Account log in details (if applicable), name, address, CCTV footage (where we operate the CCTV cameras).	Directly from you or CCTV footage.	
Prevent or detect crime, or act in the public interest including for animal welfare purposes.	Name, address, phone number, email address, CCTV footage (where we operate the CCTV cameras).	Directly from you, CCTV footage, or from third parties such as other vet practices, or competent authorities (e.g. the RSPCA).	
Handle complaints and queries including monitoring and recording phone calls for the purpose of quality assurance, training and compliance.	Name, contact details, information about the Services you have used or requested, call recordings.	Directly from you and/or from the Royal College of Veterinary Surgeons or other competent authorities.	
Send or deliver to you marketing communications to provide information about our products and services (including services provided by the rest of the IVC Group) that may be of interest to you, including sending you offers, discounts or other promotions. You can opt-out of receiving marketing from us in person or via the phone at any of our veterinary practices or use the unsubscribe link included in our marketing communications.	Name, email address, phone number, marketing preferences, preferred vet practice and information about the Services you have used or requested.	Directly from you.	Legitimate Interest to promote our business, softopt in consent for existing customers or otherwise consent.

Build and generate insights to better understand our client base, inform our marketing campaigns and activities and/or identify new potential clients (lookalikes) based on information about our existing clients, exclude you from seeing advertisements, including through third party websites and platforms (such as custom or lookalike audiences through Meta and Google).	Name, email address, phone number and information related to your use and interaction with our Services. Your personal data is securely hashed before being shared. In addition, we use cookies and other tracking technologies to collect browsing behaviour for analytics and audience targeting with your consent.	Directly from you, your computer, mobile phone or other device.	Legitimate interests to provide a better service and enhance our client base or otherwise consent.
Support insurance claims.	Name, address, email address, phone, account number, signature and financial information (such as bank account details for reimbursement).	Directly from you and/or insurance company.	Legitimate interests to run a successful and efficient business.
Deliver personalised content, promotional messages, and advertisements on our and/or third-party sites (including through advertising networks), that align with your interests and preferences.	Data related to your use and interaction with our website or Services, device data, IP address, general location data collected by cookies and tracking technologies (such as internet activity, audience information), data collected by third-party sites about your use of their sites (e.g. interactions with our pages on social media platforms such as likes, following).	Directly from you, your computer, mobile phone or other device and from marketing and advertising partners including third-party platforms, such as social media platforms.	Consent (including soft-opt in for marketing to existing customers)

Run contests or promotions on social media.	Data related to your engagement with our social media pages and your participation in our contests or promotions including, your endorsements, likes, and photos/videos you post of you and your pet.	Directly from you or from your social media interactions.
Marketing and publicity at events.	Photos taken at live events (e.g. dog/cat/horse shows, pet fairs etc.), title, name, email address, phone number and signature.	Directly from you.

In addition, we will use some or all of the above information to comply with any applicable legal obligations, to enforce any applicable terms and conditions and/ or terms of service, and to protect or defend the Services, our rights, the rights of our users, or others (for example we may process your personal data in relation to mediation services in relation to complaint resolution, animal welfare or regulatory investigations).

If we sell or acquire assets, business units or companies, we process personal data to prepare and execute transactions (e.g. information about clients or their contact persons or employees), and we may disclose such information to potential buyers or sellers. We conduct such processing in our legitimate interests to operate a successful and efficient business.

We do not normally collect or use 'special category' (or sensitive) personal data, such as health data, except where it is provided to us voluntarily in the context of a client query or complaint, in which case we process such data in accordance with your consent or as necessary to exercise or defend our legal claims.

If you do not provide us with certain personal data (such as your name, address, financial information, or any other information that is essential for us to provide the Services), we may not be able to provide our Services to you.

If you have provided a third party's personal data (e.g. as part of your pet's record), you are responsible for informing them that we will process their personal data in accordance with this Notice, and you must obtain their consent to such processing.

## 6. Who we share your personal data with:

We may share your personal data with the following recipients:

#### **Third Party Controllers**

We may share information with other organisations who are using your personal data for their own purposes, such as:

- Royal College of Veterinary Surgeons, RSPCA, SSPCA and other relevant authorities responsible for the regulation of veterinary services and animal welfare.
- Veterinary specialists, laboratories and animal health providers, hospitals, referrals, crematoria and agencies.
- Financial services providers, debt collection and credit reference agencies.
- Insurance and related companies, and other professional and legal advisors.
- Law enforcement agencies, courts, government authorities, regulators (such as RSPCA or RCVS) or other third parties when required by law (such as during an investigation) or to protect our rights or the rights of any third party.
- Advertisers, advertising networks, our social media partners (such as Meta and Google) and/or analytics providers.
- Other third parties, where any part of our business is outsourced, sold, merged, or subject to bankruptcy or other business transaction or reorganisation and were permitted by law, the new provider will become the controller of your personal data; and
- Other third parties as instructed by you, with your consent or as necessary to exercise or defend our legal claims.

#### **Service Providers**

We may share your personal data with our services providers who may process your personal data to assist us in providing you with our Services. These may include:

- Security vendors, website hosting vendors, as well as IT vendors that perform business operations for us.
- Call centre providers for customer service support, billing questions, making service calls for appointments and other outreach services as well as telemarketing.

- Third party providers or delivery services for supplying you with pet supplies, Pet Chip data, transportation of your pet to or from the veterinary practice or to/from daycare provider; and
- Veterinary laboratory and pharmacy services to process testing and provide medication or treatment.

## Others associated with your pet's record

• We may share your personal data with others you have nominated in your pet's record such as your spouse or partner (if co-owner of pet), pet handler or others authorised to make decisions for your pet (including ad hoc authorisations such as for kennels or boarding providers), unless you provide your veterinary practice with written instructions that you wish to amend the record to remove their details.

## 7. Keeping your personal data secure

We have security and other measures in place to help protect your personal data and limit how it can be accessed or used, and policies and procedures to identify and handle suspected personal data breaches and other security threats. Please be aware that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, your transmission of data is at your own risk; we cannot guarantee the security of your data transmitted from you to our network.

#### 8. Data retention

We retain your personal data only for as long as processing is reasonably necessary in accordance with applicable data privacy laws or in accordance with statutory exceptions, derogations or requirements.

When determining the length of time to retain your personal data, we consider various criteria, including whether we need the information to continue to provide you with our Services, resolve a dispute, enforce our contractual agreements, prevent harm, promote safety, security, and integrity, ensure animal welfare or protect ourselves, including our rights, property or products. We will also retain and use your personal data to the extent necessary to comply with our legal obligations, resolve disputes and enforce our terms and conditions, other applicable terms of service, and our policies. The retention period may also depend on legal or regulatory requirements to which we are subject.

Generally, your personal data will be retained for a period of 7 years from the date we stop providing our Service to you, unless:

- we are required by law, regulation or other requirements to retain such data for shorter or longer; and/or
- We need to exercise, defend or pursue legal claims.

## 9. Other important information

- Pet Data Your pet's clinical record and information about your pet, including pet's name, veterinary practice record, test results, vaccination, date of birth and/or death, litter, spay/neuter, disease, results of health or wellness checks and other treatment information is not "personal data" as defined by applicable data protection laws. This information may be shared with other veterinary or after-hours emergency vet practices and pet hospitals for your pet's treatment, continuity of care and with insurance companies for payment of services. We may also use or share this information with regulators, government agencies universities or veterinary pharmaceutical companies for veterinary health and welfare studies or analytics. We may also use a Pet Chip number with the network of official Pet Chip databases, to identify a lost, stolen or deceased animal.
- Pet Health Club Is a subscription service provided by us, and processing of your personal data associated with this service is carried out by the same controller as the controller of your veterinary practice.

#### 10. Links to other websites

If you use our websites or apps and click on external links provided on our website, you will no longer be on our website or network, and those sites will collect and process information about you for their own purposes so please refer to their applicable privacy policies.

## 11. Your Rights in relation to your personal data

You have the following rights in relation to your personal data, the right to:

- Request information about how we are using your personal data.
- Request a copy of your personal data.

- Request the correction of any personal data that is inaccurate or completion of any personal data that is incomplete considering the purposes of processing.
- Request the deletion of your personal data.
- Withdraw your consent if you previously consented to processing of your personal data.
- Request to stop processing your personal data, other than for storage purposes.
- Object to our processing of your personal data.
- · Object to marketing; and
- Transfer elements of your personal data to another service provider.

Some of these rights may be limited in certain circumstances, or subject to exemptions. For example, where fulfilling your request would adversely affect other individuals or our trade secrets or intellectual property, where there are overriding public interests or where we are required by law to retain your personal data.

If you want to exercise any of your rights above, please contact us at **info@stoleysvets.com**. You may also make a complaint to the UK Information Commissioner's Office.

## 12. Changes to your personal data

It is important that the personal data we hold about you is accurate and up to date. Please keep your veterinary practice informed if your personal data changes during your relationship with us so we can make the necessary updates to your record.

#### 13. Contact details

We welcome your questions, comments, and concerns about this Notice or the way in which we process your personal data. You can contact us as follows:

By email: info@stoleysvets.com