

31 July 2018

Privacy Policy

House and Jackson respects your right to privacy. This Privacy Policy explains in detail the types of personal information we may collect about you when you interact with us. It also explains how we will store and handle that personal information, how we keep it safe, how you can exercise your privacy rights.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided in the section of this Privacy Policy headed "how to contact us"

Details of Data Controller:

- House and Jackson LLP, Rookery Road, Blackmore, Essex CM4 0LE, 01277 828986
- Companies House Registration: OC339156

Person responsible for Data Protection:

- Laura Purser

Reasons for collecting, storing and processing your personal information:

- We process information to enable us to provide your pets with veterinary services (preventative, maintenance and emergency) and
- To inform you of the services available,
- To maintain our accounts and records
- To support and manage our employees.
- We also process personal information using a CCTV system to monitor and collect visual images for the purpose of security, staff safety, patient monitoring and the prevention and detection of crime.
- To send you marketing and promotional offers and to manage your marketing preferences if you elect not to receive marketing and promotional offers from us;
- To conduct analytics to understand how our services are used; and/or
- Notify you about changes to our service.

The legal basis for processing your personal data are as follows:

- Consent - You have given clear consent for your personal data to be processed for a specific purpose
- Contract - the processing is necessary for a contract we have with you as an individual, or because you have asked us to take specific steps before entering into a contract. Included in this category is:
 - Processing of Insurance Claim forms and sending to relevant Insurance company
 - Sending samples and request forms to external laboratories for testing
- Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations). This includes but is not limited to:
 - The reporting of notifiable diseases to appropriate government agencies
 - The registration of canine microchip details with appropriate database
- Legitimate interests: the processing is necessary for legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. These include:

- The provision of reminders for preventative healthcare such as, but not limited to, vaccinations, dentistry and parasite control.
- The Processing of Insurance claim forms
- Sending samples and request forms to external laboratories for testing
- Transmission of client contact details via paging service and SMS to employed clinical staff in order to provide sufficient healthcare services including emergency, out of hours service.
- Registration of Feline, Equine and Exotics microchip details with appropriate databases to aid in reunification.

The categories of personal data that we obtain

- We only collect and store Personal Data
- We do not collect and therefore do not hold any special categories of data (including 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), any information about criminal convictions or offences. Please do not provide us with any of this data via any type of correspondence

Information that we may obtain from third parties:

- From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us. For example we may receive personal information from other veterinary professionals if you are referred to us or move to us from another veterinary practice.

Third parties to whom we may send your personal information:

- Pet insurance companies - data will only be passed to Insurance companies where a policy between the individual and that insurance company already exists
- External Laboratories - Not all laboratory tests can be performed on site and so are sent to external laboratories. The minimal amount of client personal data is sent with these samples to enable identification of the patient i.e. Client surname and animal name.
- Immunotherapy allergy vaccines are also obtained from an external laboratory and require client name and address as well as animal name.
- Veterinary Referral centres and external practitioners (including Physiotherapists, Osteopaths, Consultant Veterinary Surgeons, Farriers). Client contact information and animal details are transmitted to external referral centres or practitioners when necessary for appropriate healthcare of the patient and only with prior knowledge of the Client.
- Microchip registration databases
- Debt collection agency - Client contact details will be sent to our Debt Collection agency only when the individual has not complied with our payment policy and only when written notice has been supplied to that individual to the contact details that we have for them.
- Charities - The Dogs Trust is passed Client information for the purposes of the neutering voucher scheme, other charities may be contacted from time to time in order to seek financial assistance for our clients where appropriate and in conjunction with the Client.
- Relevant client contact details are sent securely to specific third parties in order for treatment reminders to be sent via SMS text.
- Vendor details are included in all vetting reports which are then sent to the Purchaser once complete
- Joint Measurement Board - Client details are attached online to forms originally created by the client in order to register official measurements
- Comfort Club (Elanco) - Clients enrolled on 'The Comfort Club' will have their name and animal name passed to Elanco within the administration of The Comfort Club
- Veterinary Medicines Directorate and Drug manufacturing companies - For the purpose of reporting adverse reactions to medications patients details including Client surnames are provided as part of the reporting procedure
- Pet Crematoriums - Client contact details are passed onto Pet Crematoriums when Clients have requested individual cremation for their pet.

- Chemists/Pharmacies/Dispensaries - Client contact details are recorded on the prescription along with animal details (as required by law) when a prescription for a specific medication not for stock and not available from our wholesalers is required
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary: (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights or apply our Terms and Conditions, or (iii) to protect your vital interests or those of any other person;

Transfer of your information to other countries

- Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of the UK.
- Any transfer of your personal information will follow applicable laws and we will treat the information under the guiding principles of this Privacy Policy.

Data Retention

- We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).
- When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Data protection rights

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided at the end of this document.
- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details below.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by contacting us using the contact details provided below.
- Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. If you feel that your personal information has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal information, you have the right to raise a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113 or go online to www.ico.org.uk/concerns (please note we cannot be responsible for the content of external websites)
- We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Conducting analytics

We will use the personal information we hold about you (as well as pseudonymised or anonymised information generated from your personal information) to carry out analysis and research. We carry out all such analysis and research on the basis that it is necessary for the purposes of our legitimate interests in understanding our clients and ensuring that our services and products meet the needs of our clients. We undertake data analytics, whereby we combine information we hold on a large scale in order to:

- Learn more about our clients and their preferences;
- Identify patterns and trends amongst our clients;
- Enhance user experience on our Website;

- Provide information, content and offerings tailored to our clients' needs;
- For general research and statistical purposes;
- For aggregated reporting purposes;
- To help us develop new services, treatment plans, health plans and products;
- To monitor performance of our services;
- To be able to send you personalised marketing messages; and
- To display online advertisements to you.

We will use your personal information (including by anonymising and aggregating it with other clients' personal information) for sales, supply chain and financial analysis purposes, to determine how we are performing and where improvements can be made. This is necessary for the purposes of our legitimate interests in understanding how our business is performing, and considering how to improve our performance.