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# THE ALTERNATIVE VET PRACTICE DATA PROTECTION POLICY May 2018

## 1. Introduction

This policy sets out the obligations of The Alternative Vet Practice regarding data protection and the rights of its clients in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (GDPR).

The policy is to ensure that all personal data kept and processed by The Alternative Vet Practice is dealt with in accordance with the GDPR.

The data provided by practice clients will be stored safely and only disclosed to parties whose role requires them to process some, or all, of that information.

This policy is also to ensure that all relevant parties are aware of the GDPR and client's rights.

It aims to address key elements of the GDPR, namely

- Why data is kept
- Whose data is kept
- What data is kept
- When the data is used
- Where the data is processed
- How long the data is kept

The GDPR defines "personal data" as any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

The Alternative Vet Practice is committed not only to the letter of the law but also to the spirit of the law and places high importance on the correct, lawful and fair handling of all personal data respecting the legal rights, privacy and trust of all its clients.

## 2. The Data Protection Principles

This policy aims to ensure compliance with GDPR. The GDPR sets out the following principles with which any party handling personal data must comply.

All personal data must be:

1. Processed lawfully, fairly and in a transparent manner in relation to the person.
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purpose.

3. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
4. Accurate and, where necessary, kept up-to-date. Every reasonable step must be taken to ensure personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
5. Kept in a form which permits identification of the person for no longer than is necessary for the purposes for which the personal data is processed.
6. Processed in a manner that ensures appropriate security of the personal data, including against unauthorised or unlawful processing and against accidental loss, destruction or damage using appropriate technical and organisational measures.

### 3. Why the data is kept

The Alternative Vet Practice needs to keep personal details of clients so that we can correlate it to the health information of their pets, for legal record keeping requirements on medical products including controlled drugs, and so that we can keep in touch with relevant marketing communication that we believe will be of interest to our clients.

We will only ever collect, store and use client's personal data when we have an identified purpose and reason to do so. The Information Commissioners Office refers to this as the 'lawful basis' for processing personal data.

### 4. Whose data is kept

Client's relevant personal data is kept.

New clients consent to provide their personal data, and are provided with a copy of the 'Fair Processing Notice'.

In accordance with the GDPR, clients of The Alternative Vet Practice have the following rights:

- **The right to be informed** – you have right to know what information is held about you and how it is processed
- **The right of access** – you have the right to request a copy of the information that we hold about you
- **The right of rectification** – you have the right to ask us to correct data that we hold about you that is inaccurate or incomplete
- **The right to erasure also known as the right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records
- **The right to restrict processing** – where certain conditions apply you have the right to ask us restrict the processing
- **The right to data portability** – you have the right to have the data we hold about you transferred to another organisation
- **The right to object** – you have the right to object to certain types of processing such as direct marketing

### 5. What data is kept

Each client's name, address, telephone number as well as occasionally email address, plus details about their pets, will be kept.

This data is received either by phone, message, email or in person from the client.

The Alternative Vet Practice does not collect any data categorized as 'Sensitive Personal Data'.

### 6. When the data is used

The data is used each time the client contacts 'The Alternative Vet Practice' by phone, message, email, in person during an appointment or when vaccination reminders for client's pets are sent out.

Clients are given the opportunity to up-date their contact details whenever required.

Data up-dates and sending out of vaccination reminders are done under the lawful basis of 'legitimate interest'.

## **7. Where the data is processed**

The data is processed in the vetmobile of The Alternative Vet Practice as well as in the home office of the practice proprietor.

Paper record cards containing personal data of clients are kept securely in a locked metal box. Any electronic documents, such as invoices, which contain personal data are kept on the practice proprietor's laptop only and are password controlled.

Data is shared with third parties only with explicit permission by the client. This may include passing on personal data to microchipping databases for registration of client's pets or to Stud-Book Societies for registration of mares/stallions. Also, personal data of clients in relation to relevant medical information of their pets may be passed on to their regular veterinary practice or if transferring to a new veterinary practice.

No data is sold to third parties for any reason.

## **8. How long the data is kept**

The Alternative Vet Practice will not retain any personal data for any longer than is necessary in light of the purpose for which the data is collected, kept and processed.

Veterinary Medicines Regulations set out that records for veterinary medical products including records for retail supply (incl administration) of POM-V and POM-VPS medicines must be kept for five years.

Following the recommendation of professional indemnity insurers, medical records (on paper and electronically) are retained for seven years.