

# PRIVACY POLICY

## Holmarsh Canine Hydrotherapy Privacy Policy

Holmarsh Canine Hydrotherapy is dedicated to protecting the confidentiality and privacy of information entrusted to us. As part of this fundamental obligation, Holmarsh Canine Hydrotherapy is committed to the appropriate protection and use of personal information, collected through our websites, referral forms, telephone calls, emails and other mediums. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure you are still happy with any amendments we have made. This policy is effective from 1<sup>st</sup> May 2018.

### A) DATA PROTECTION PRINCIPLES

Under General Data Protection Regulations (GDPR), all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

### B) TYPES OF DATA COLLECTED AND HELD

We may collect the following information:

- Name
- Demographic information such as address and postcode
- Contact information including email address
- Pet information

### C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during the initial contact period and subsequently at the initial assessment day with your pet.

In some cases, we will collect data about you from third parties, such as Veterinary Centres or Specialist Referral centres when they have referred your pet directly to our rehabilitation centre.

Personal data is kept in files and within the Company's IT system.

### D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. We process your data in order to comply with our legitimate interests we have with you.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
To enable us to obtain Veterinary Consent so that we	Our legitimate interests

can start to provide rehabilitation to your pet	
Maintaining comprehensive up to date personal records about you to ensure, amongst other things, effective correspondence can be achieved	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Track audience, acquisition and behaviour overviews to improve our website function	Our legitimate interests

## E) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements with you. This could include being unable to offer you rehabilitation services for your pet.

## F) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for, administration and small animal Hydrotherapy and Physiotherapy services will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processed in line with GDPR.

Data is shared with third parties for the following reasons: For obtaining full veterinary records on your pet and to enable a referral for Acupuncture where this service is requested.

We do not share your data with bodies outside of the European Economic Area.

## G) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Please be aware that Holmarsh Canine Hydrotherapy website may contain links to other sites that are not covered by this Privacy Policy. We encourage users to review the Privacy Policy of each website visited before disclosing any personal information.

## H) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your pets treatment with us. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

Record	Statutory Retention Period
Name, Address, contact details, account transactions to satisfy HMRC	6 years from the date of your last session

## I) CONSENT

Where you have provided consent to use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

## J) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

## K) DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is: Mark Challenger