

# **General Data Protection Regulation (GDPR) Privacy Statement**

## **Meadow Farm Hydrotherapy and Animal Behaviour**

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our clients, of the types of data we process about you. 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.

**This notice applies to current and former clients.**

### **DATA PROTECTION PRINCIPLES**

Under 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:

- Processing is fair, lawful and transparent
- Data is collected for specific, explicit, and legitimate purposes
- Data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- Data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- Data is not kept for longer than is necessary for its given purpose
- 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

### **TYPES OF DATA HELD**

We keep several categories of personal data on our clients in order to carry out effective and efficient processes and provide our services to you. We keep this data in a client file relating to each client and their animals treated.

Specifically, we hold the following types of data:

- Personal details such as name, address, phone numbers and email address
- Veterinary records shared with us by the referring veterinary practice which may include your personal details
- Information of any disability or health concern that you freely give us that may affect the way we provide our services to you and compile our treatment plans for your animals
- Information of any incidents and injuries occurring on our premises
- Records relating to your animal's treatment, the monitoring of progress and any information and personal data you freely give us in relation to this
- CCTV recording for security purposes on our premises

### **COLLECTING YOUR DATA**

You provide several pieces of data to us directly during the referral process and subsequently upon the start and continuation of your animal's treatment. Personal data is kept as paper files or within our IT systems.

## 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 a legal requirement or in order to effectively manage the service contract that we have with you. The information below categorises the types of data processing we undertake and the lawful basis we rely on.

<b>Activity requiring your data</b>	<b>Lawful basis</b>
Providing the services contract that we have agreed to enter into with you at the time of referral	Performance of the services
Making reasonable adjustments for disabled clients	Legal obligation
Maintaining comprehensive up to date personnel records about you to ensure effective communication can be achieved with yourself, other therapists and the veterinary practices involved in your animals care	Our legitimate interest and legal obligations
Implementing grievance procedures	Our legitimate interest
Managing accounting systems regarding payments and money owed to us	Our legitimate interest
Dealing with legal claims made against us	Our legitimate interest
Ensuring security at our premises	Our legitimate interest

## SPECIAL CATEGORIES OF DATA

We do not carry out processing activities using special category data.

Special categories of data are data relating to your:

- Race
- Ethnic origin
- Political opinion
- Religion
- Trade union membership
- Genetic and biometric data.
- Health
- Sex life
- Sexual orientation

## FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract with you. This could include being unable to provide advice and treatment for your animals.

## CRIMINAL CONVICTION DATA

We do not collect criminal conviction data.

## WHO WE SHARE YOUR DATA WITH

- Administration personnel within Meadow Farm Hydrotherapy and Animal Behaviour who are involved with:
  - Administration of payments and accounts
- Other Therapists and Veterinary Practices involved in your animals care and welfare
- CCTV digital images will only be shared after a specific request from the police or insurance companies.

All such people will have responsibility in ensuring data is processed in line with GDPR.

We do not share your data with third parties other than for the collection of debts owed to us and to comply with any legal obligation upon us. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

## 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.

## RETENTION PERIODS

We only keep your data for as long as we need it. Digital CCTV images are retained on a single non network linked unit using standard hard drive technology. Footage is stored for 7 days and thereafter is overwritten by the recording unit.

Some data retention periods are set by law and are set out below:

Record	Statutory retention Period
Treatment records and related data	5 years
HMRC and related data	6 years
Health and Safety regulations	Permanently
Digital CCTV image requests and related recordings	5 years

## AUTOMATED DECISION MAKING

We will not make decisions about you solely on the basis of automated decision making. Automated decision-making means making decision about you using no human involvement e.g. using computerised filtering equipment.

## CLIENT'S RIGHTS

You have the following rights in relation to the personal data we hold on you:

- The right to be informed about the data we hold on you and what we do with it
- The right of access to the data we hold on you.
- The right for any inaccuracies in the data we hold on you, however they come to light, to be corrected.
- The right to have data deleted in certain circumstances.
- The right to restrict the processing of the data
- The right to transfer the data we hold on you to another party.
- The right to object to the inclusion of any information
- The right to regulate any automated decision making and profiling of personal data.

## **CONSENT**

Where you have provided consent to our 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.

## **MAKING A COMPLAINT**

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner.

You can contact the ICO at

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone - 0303 123 1113 (local rate) or 01625 545 745.