

## All Pets Ltd Privacy Notice

This privacy notice tells you how All Pets Ltd will collect and process your personal data if you register as a client, purchase our services and products, and use our website.

### About Us

All Pets Ltd is an independent small animal veterinary surgery in St Peter, Jersey. We protect the health and well-being of your pets, offering a range of services that include: diagnosing and treating sick and injured animals, advising owners on the right pet care, and providing a range of care related products for purchase.

### How we collect and process your personal data

#### Who to contact regarding your personal data

We take your privacy seriously. Our Data Protection Manager looks after data protection and would be happy to answer any of your questions about this privacy notice and how All Pets Ltd uses your data. They can be contacted directly at [info@allpets.je](mailto:info@allpets.je) or on (01534) 745999.

#### The personal data we collect and process

We will only use your personal data where there is a clear legal basis to do so. There are four main ways we process the personal data you provide. We endeavour to keep this information accurate and up to date, and not keep it longer than is necessary.

##### 1. To administer your account as a surgery client

In order to perform a contract between us to provide our service effectively and ensure the best possible care for your pet, we need to collect and process the following personal data when we register you as a client.

Personal data type	How the data is collected
First name, Last name	As part of registering to be a client
Address	As part of registering to be a client
Phone number (home and/or mobile)	As part of registering to be a client
Email address	As part of registering to be a client

This personal data will be used for the following services and purposes:

- To administer your account and provide the products and services you have requested from us. For example, invoicing, calling to change an appointment and to keep a record for legal and accounting purposes.
- To inform you by email of service information about the practice. For example, notification of seasonal opening times or changes to out of hours availability.

- If you have pet insurance and you wish to make a claim, we will pass on your pet's clinical history with your name and address to your insurance company to allow them to process your claim.
- To ask you for feedback on your experience with All Pets Ltd

If you decide to purchase our pet health plan and pay by direct debit, you will also need to provide bank account details to set up and confirm your direct debit. We do not retain this information once your direct debit is confirmed.

## 2. To send you marketing communications as a surgery client

We send all our clients the following marketing communications, which is necessary for our legitimate interest to develop and build our practice. These communications include:

- Reminders for pet vaccinations and administering preventative healthcare treatments.
- News information on animal welfare, like top tips for exercise and health checks you can do yourself.
- Promotions and the latest related product offers.
- Promoting products and services through Facebook and Instagram advertising.

Clients find these communications useful in administering care to their pets and to keep up to date with what is going on at the surgery. They are **only sent to existing clients who can opt-out at any time.**

The personal data that we process for these communications is first name, last name, address, email address and mobile phone number.

We would like our clients to enjoy these communications, so it is important to note that you can opt-out at any time by:

- Clicking the 'Unsubscribe' link in any marketing communications email.
- Calling our team at the surgery on (01534) 745999.
- Dropping into the surgery and speaking to a member of our team.

## 3. To share with veterinary related 3<sup>rd</sup> parties WITH your consent

There will be occasions where we will need to ask for your consent to share your personal data with a 3<sup>rd</sup> party:

- If you would like your pet to be referred to a specialist veterinary surgeon, we will provide them with your pet's clinical history with your name and address to enable them to confirm your referral appointment.

- Should you wish to move to an alternative veterinary surgery, we will provide your pet's clinical history with your name and address to your new vets before closing your account.
- Should you wish to chip your pet (dogs, cats and rabbits), we register your name, address and contact number with the chip provider.
- Should you wish to purchase a pet tag, we will provide your name for identification and your contact number for engraving to the pet tag provider.

All Pets Ltd will not pass on your personal data to any third parties without your consent unless the law requires us to do so. We do not provide any personal data to the suppliers of the medicines we administer or the pet care products we sell.

#### **4. When you use our allpets.je website**

This is necessary for our legitimate interests to provide a great website experience and respond to enquiries.

When someone visits allpets.je we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things like the number of visitors to the various parts of the website. This information is processed in a way which does not identify anyone.

We use cookies, which are small text files that are placed on your computer when you visit. We do this to make our website work more efficiently and to promote our news, products and services on social media. Visit <https://allpets.je/legal> to manage your cookie settings and view more information on how we use them and why.

All Pets Ltd uses a third party service to help maintain the security and performance of our website. To deliver this service it processes the IP addresses (a number assigned to each of your devices connected to the internet by your broadband provider) of visitors to the All Pets Ltd website.

We provide contact forms on our website and collect users' personal information to help them complete certain tasks. Each form details the information required and an explanation of what the form is for. For general enquiries, once an enquiry has been dealt with, the data is deleted in line with All Pets Ltd procedures.

#### **Sensitive Data**

We do not collect sensitive or special category data.

#### **Disclosure of personal data to our service providers**

We may pass on your personal data to service providers contracted to All Pets Ltd in the course of dealing with you. They act as a data processor on our behalf and are obliged under contract to keep your details secure, and only use them to fulfil the services they provide on our behalf. When they no longer need your data to fulfil this service, they dispose of it in line with All Pets Ltd procedures.

If we sell any business assets in which case we may disclose your information to the buyer of such business or assets.

All Pets Ltd will not pass on your personal data to any other third parties without your consent unless the law requires us to do so.

### **International Transfer**

We do use data processors that provide our email marketing system that reside outside the European Economic Area (EEA). This means that the processing of your personal data will involve a transfer of data outside of the EEA.

Our data processors are based in Atlanta, USA, and are EU-US Privacy Shield certified, which requires them to provide similar protection to personal data as it has in Europe under GDPR.

### **How long do we process your data for?**

All Pets Ltd is required to retain information in accordance with the law, such as information needed for income tax and audit purposes.

In order to comply with our professional liability insurance, we keep and securely store past clients records for six years. This includes full name, address, email address and telephone number, but excludes bank account details.

We will only process your personal data whilst you are a client. After two years of inactivity we will email or call clients to prompt them to see if they wish to remain as a client. If there has been no activity for this two years, and no response to our enquiries we will close the client's account and archive the data.

### **Data Security**

We have put in place appropriate security measures to prevent your personal data being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

There are also procedures in place to deal with any suspected personal data breach and we will notify you and the Information Commissioner, Jersey's Office (ICO) of a breach where we are legally required to do so.

### **Third-party Links**

Our website may include links to third-party websites. Clicking on those links may allow third parties to collect or share data about you. We do not control these websites and are not responsible for their privacy statements.

### **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you the data subject, have the following rights:

- *Right of access* – you have the right to request a copy of the information that we hold about you.

You can do that by emailing [info@allpets.je](mailto:info@allpets.je) or by calling (01534) 745999. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

Please note that you will need to provide proof of identity – a current passport or driving licence.

- *Right of rectification* – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- *Right to be forgotten* – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- *Right to restriction of processing* – where certain conditions apply you have a right to restrict the processing.
- *Right of portability* – you have the right to have the data we hold about you transferred to another organisation.
- *Right to object* – you have the right to object to certain types of processing such as direct marketing.
- *Right to object to automated processing, including profiling* – you also have the right to be subject to the legal effects of automated processing or profiling.
- *Right to judicial review*: in the event that All Pets Ltd refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

### **Complaints**

We take the processing of your personal data very seriously and are here to help with any concerns you may have. Please do contact the Data Protection Manager at [info@allpets.je](mailto:info@allpets.je) or (01534) 745999.

If you are still not happy with how your personal data is being processed by All Pets Ltd or how your complaint has been handled, you also have the right to lodge a complaint directly with the Office of the Information Commissioner, Jersey by email at [enquiries@oicjersey.org](mailto:enquiries@oicjersey.org) or by calling 01534 716530.

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