



Privacy Policy

Cromer Vets Ltd are committed to protecting and respecting your privacy.

This policy (together with our Terms and Conditions of Business and any other documents referred to in them) sets out the basis on which any personal data we collect from you, or that you provide to us, will be used, stored, processed, and/or transferred by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it and your rights with respect to it.

For the purposes of the General Data Protection Regulation, the data controller is Cromer Vets Ltd company No 12879049, Registered in England & Wales. Registered office, Hornbeam Business Park, Hornbeam Road, North Walsham, NR28 0FX.

What personal data we collect from you We will collect and process the following data about you:

Personal data you give us. This is data about you that you give us by filling in forms or by corresponding with us by phone, e-mail, in person or otherwise. It includes data you provide for the purpose of providing our services to you, when you use our services, register with us, subscribe to our services, subscribe to receive information from us, participate in discussion boards or other social media functions on our website or on our social media sites, enter a competition, promotion or survey, interact with our accounting and fee-paying systems and when you report a problem with our website. The data you give us may include

your name, address, e-mail address and phone numbers, financial and credit card information, date of birth, names and details of animals owned by you or in your care, details of other service providers and referring vets that you interact with, insurance details and other information pertinent to the provision of our services.

Personal data we collect about you. With regard to each of your visits to our website we will automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and geographical location;
- analytical information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), services and products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and device type.

Personal data we receive from other sources. This is data we receive about you from previous or referral vets or other service providers. This data may include your name, address, e-mail address and phone numbers, financial and credit card



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information, date of birth, names and details of animals owned by you or in your care, details of other service providers and referral vets that you interact with, insurance details and other information pertinent to the provision of our services.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

How we use the personal data collected
We use data held about you in the following ways:

Personal data you give to us. We will use this data:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer,

and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this;

- to notify you about changes to our service, our terms and conditions or our policies;
- to ensure that content from our website is presented in the most effective manner for you and for your computer.
- Personal data we collect about you. We will use this data:
- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our website to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our website safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them.

Data we receive from other sources. We will combine this data with data you give to us and data we collect about you. We will use this data and the combined information for the purposes set out above (depending on the types of data we receive).



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Our Legal Basis for processing your personal data:

- It is necessary for us to process your personal data for performance of the contract between us in relation to the services you have asked us to provide.
- In certain circumstances, we process your personal data after obtaining your consent to do so for the purposes of sending you marketing communications, inviting you to events and professional development courses, keeping you informed of Practice news and notifying you of changes within the Practice.

When we rely on our legitimate interests in order to collect and use your personal data including for the purposes of automated decision making and profiling as set out in Automated decision making below, we must consider whether those legitimate interests are overridden by your interests or your fundamental rights and freedoms. We may continue only if we decide that your interests, rights and freedoms do not override our legitimate interests.

We have considered these matters, and where we think there is a risk that one of your interests or fundamental rights and freedoms may be affected we will not use your personal data unless there is another legal basis for us to do so (either that it is necessary for us to perform our contract with you, or on the basis of your consent).

Automated decision making

Some decisions within the Practice are made automatically depending on the information

you provide or we collect from you. The information may relate to:

- The branch to which your account is assigned
- Your type of animal

Retention of your personal data

How long we keep your personal data

We will keep your personal data as set out below, or as necessary for conducting the business of providing the services to you and completing any contract with you:

- In accordance with the requirements and recommendations of HM Revenue and Customs.
- In accordance with the requirements and recommendations of the Royal College of Veterinary Surgeons (RCVS)
- In accordance with the requirements and recommendations of the Veterinary Defence Society (VDS).
- In accordance with our recruitment privacy policy

Disclosure of your personal data

You agree that we have the right to share your personal data with:

- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- Selected third parties including:
- Veterinary surgeons, laboratories, business partners, suppliers and sub-contractors or debt collecting



agencies who act on our behalf for the performance of any contract we enter into with you or for the purpose of communicating with you;

- Analytics and search engine providers that assist us in the improvement and optimisation of our website;
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We will disclose your personal data to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If Cromer Vets Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use, or terms and conditions of supply, or terms and conditions of business and other agreements; or to protect the rights, property, or safety of Westover Vets Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we store your personal data

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Your rights

You have a number of rights when it comes to your personal data.

Rights - What does this mean?

The right to be informed - you have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we're providing you with the information in this Notice.

The right of access - you have the right to obtain access to your personal data (if we're processing it), and certain other information (similar to that provided in this Privacy Notice) free of charge, except where your requests are manifestly unfounded or excessive, particularly if it is repetitive, in which case we may charge a reasonable fee or refuse to respond. If we refuse, we will write to you explaining why. We will provide the data within one month of receipt of your



request, except where the request is complex or numerous. In this case we will respond to you within one month advising you of this. This right is to allow you to be aware of and verify the lawfulness of the processing.

The right to rectification - you are entitled to have your personal data rectified if it is inaccurate or incomplete. We will respond within one month of receipt of your request for rectification, unless the request is complex. If we refuse to rectify your personal data, we will write to explain why.

The right to erasure This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal data.

This is not a general right to erasure; it only applies in these specific circumstances:

- The personal data is no longer necessary in relation to the purpose for which it was original collected;
- When you withdraw consent;
- When you object to the processing of your personal data and there is no overriding legitimate interest to continue the processing;
- The personal data was unlawfully processed;
- The personal data has to be erased in order to comply with a legal obligation; and
- The personal data is processed in relation to the offer of information society services to a child.

In addition there are exceptions which include where the personal data is processed for the following reasons:

- To exercise the right of freedom of expression and information;
- To comply with certain legal obligations;
- For public health purposes; and
- Exercise or defence of legal claims.

The right to restrict processing - you have rights to 'block' or suppress further use of your personal data. When processing is restricted, we can still store your personal data, but will not process it. We keep lists of people who have asked for further use of their personal data to be 'blocked' to make sure the restriction is respected in future. We will inform you if we decide to lift a restriction on processing.

The right to data portability You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability. This only applies if your data is processed by automated means and is technically feasible with our IT systems. It is provided free of charge. We will respond to such request within one months, unless the request is complex.



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The right to object to processing - you have the right to object to processing for direct marketing (which we do only with your consent) and also to processing which is carried out for the purposes of our legitimate interests.

The right to lodge a complaint - you have the right to lodge a complaint about the way we handle or process your personal data with the Information Commissioner's Office.

The right to withdraw consent - if you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates.

If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Consequences of failing to provide personal data

If you fail to provide personal data we may not be able to provide our services to you. Please discuss any concerns you have with us before failing to provide this.

Changes to our privacy policy

We amend these terms from time to time. Every time you wish to use our website, please check these terms to ensure you understand the terms that apply at that time.

Contact

Questions, comments and requests regarding this privacy policy should be addressed to

hannahtolman@westovervets.co.uk.

If you no longer wish to receive such or certain communications, you can let us know by contacting us at hannahtolman@westovervets.co.uk.

You may also update your preferred contact details at any time by contacting us at the above address.

If we have your consent, we will contact you by post, e-mail, SMS text messages, telephone or other means including other electronic means such as Facebook and social media applications for marketing purposes, and only using such contact details as you provide to us from time to time.