Privacy Notice

Last updated 31 January 2025

Welcome to the Donnington Grove Veterinary Group Limited privacy notice.

Donnington Grove Veterinary Group is part of IVC Evidensia, a global leader in veterinary care. See our website <u>www.ivcevidensia.com</u> for details.

We respect your privacy and are committed to protecting your personal data.

This notice explains how we collect, use, and protect information about you, who we may share it with, and the rights that you have. This notice covers most of the ways in which you will interact with us, through the website, in our practices, on social media or via our apps.

It is important that you read this notice carefully so that you understand how we look after and process your personal data, and so that you are aware of your privacy rights and how the law protects you.

If we need to use your personal data in different ways, or for reasons not covered by this notice, we will let you know. This could include notifications, signage in specific locations or other messages. We will also update this notice from time to time.

Please also note that this notice does not apply to data about your animal, which are covered by the Royal College of Veterinary Service (RCVS) guidelines. Data related solely to animals is not subject to data protection law.

What is included in this privacy notice?

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1. Important information and who we are

Controller

For the purpose of the UK General Data Protection Regulation, Donnington Grove Veterinary Group Limited, also known as Donnington Grove Veterinary Group ("Donnington Grove"), of The Chocolate Factory, Keynsham, Bristol BS31 2AU, is the data controller responsible for the processing of your personal data (collectively referred to as "Donnington Grove", "we", "us" or "our" in this privacy notice). We are registered with the Information Commissioner's Office in the UK with reference number ZA809048. Donnington Grove is part of IVC Evidensia, which also includes all of our clinics, and also the brands Pet Health Club, My Family Vets, and Pet Drugs Online (PDOL). Please note that our brands may have their own Privacy Notices, please check their websites for the applicable Privacy Notice, for example, the Privacy Notice of Pet Health Club™ is available <u>here</u>.

Personal data processed by any company within the IVC Evidensia Group ("IVC Group") will also be made available to other IVC Group where we need to - for example, to provide or support our services to you, where we are under a legal obligation, or if you have given us your consent (for example for marketing purposes).

You can find a list of companies in the IVC Group <u>here</u>, which includes brands such as Easy Direct Debits, VetsNow, PetAir, Pawsquad amongst others, which may be registered as separate controllers with the ICO and subject to their own privacy notices.

Contact Details

Donnington Grove has appointed a Data Protection Officer. If you have any questions about this notice, including any requests to exercise your legal rights, please contact them by using one of the following methods:

- By post FAO: Data Protection Officer, Donnington Grove Veterinary Group Limited, The Chocolate Factory, Keynsham, Bristol, BS31 2AU
- By email privacy@ivcevidensia.com

Other Controllers

Where you use our websites or apps and click on external links, or visit our social media pages, your personal data may also be processed by the providers of those services – for example Meta (Facebook) or X. Those sites will collect further information about you for their own purposes, separately from IVC Group. Please take the time to review their applicable privacy policies.

Where we also use the personal data they collect, IVC Group might also be jointly responsible with the other company for determining how and why your personal data is used, and making sure that it is protected.

2. The personal data we collect and how we use it

Personal data that we collect includes:

- Personal identifiers, such as your title, name, date of birth, gender, car registration number, nationality, image and picture (to the extent you participate in our marketing activities/campaigns)
- Contact details such as your address, phone number, including email and social media account information if you contact us that way, and location information where we are referring you to local services

- Information about services you have used or requested, customer service information such as compliments or complaints, opinions and survey responses, contact preferences, and information which our employees might record as they provide services to you or your animals. This may also include recording calls you make to some of our services
- Financial information, including payments made, bank account information, credit card/debit card number and credit status
- Information about how you use our websites and online services including social media pages and apps, including personal data about your account such as account number, account log-in details and account usage details, technical identifiers such as cookies or via your browser's consent management options (<u>more information</u> <u>here</u>)

We will process these personal data for the following purposes and based on the following legal bases:

- Provide the services you are using or have requested, and manage payment for them as part of our contract with you. Such processing is necessary to perform a contract with you or to take steps requested by you prior to entering into a contract
- Improve our services to you and other customers, including gathering feedback from you via surveys and analysing personal data about your use of our services. Such processing is in our legitimate interests to improve our services
- Manage our online and other services effectively and securely. Such processing is necessary to perform a contract with you or to take steps requested by you prior to entering into a contract, and in our legitimate interests to improve our services
- Protect our group companies or our customer's rights or property, including enforcing our terms and conditions. Such processing is in our legitimate interest to run a successful business
- Meet legal and regulatory obligations, to prevent or detect crime, or in the public interest, including protection of animal welfare. Such processing is necessary for compliance with legal obligations we are subject to, and in our and third parties' legitimate interests to protect animal welfare
- Conduct marketing activities and provide information about products and services that may be of interest to you. This may include using your contact details to get in touch, where we feel there would be a health benefit to your animal. Such processing is in our legitimate interests to communicate with our customers, and where required by applicable law, conducted with your consent
- Telemarketing: We will use your contact details and information about your use of our products and services for marketing activities, including to provide information to you about our services, special offers, developments or any other information that may be of interest to you, or where we feel there would be a health benefit to your animal. We may, from time to time, contact you by telephone for such purposes. Sometimes, we rely on trusted third parties to help us conduct such marketing on our behalf. Such processing is in our legitimate interests to communicate with our customers, or with your consent, where consent is required by applicable laws. Please see section 3 on how to change your consent preferences.

If you do not want us to use some of your personal data, we may not be able to provide services to you – for example, if you fail to provide your payment details, we may not be able to sign your pet up to a health plan and you will not receive any associated benefits.

We do not normally collect or use 'special category' personal data, such as health data, except where it is provided to us in the context of a customer query or claim, in which case we process such data in accordance with your consent or as necessary to exercise or defend our legal claims.

3. How we collect your personal data

We use different methods to collect personal data. These include:

- a) Directly from you you may give us any of the above information by subscribing to one of our health plans or contacting us via social media, telephone, post, email, or face-to-face in one of our clinics. We may also collect personal data if you attend any events that we are participating in.
- b) Automated technologies or interactions as you interact with our website and apps, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other tracking technologies. We may also receive this technical data about you if you visit other websites which employ our cookies please review our <u>cookie policy</u> to read about how we use our cookies.
- c) Third parties we may receive the categories of personal data set out above in Section 2 about you from third parties such as:
- Providers of technical, payment and delivery services
- Advertising networks (based on your cookie consent)
- Analytics providers
- Credit reference agencies
- Where your pet is referred to us from another practice, information that practice holds about you
- Other IVC Evidensia Group companies
- Debt recovery agencies
- Royal College of Veterinary Surgeons
- Other veterinary specialists, laboratories and animal health providers and agencies, where the personal data cannot be anonymised or is otherwise necessary

Marketing and Consent Preferences

You can ask us to stop sending you marketing messages at any time by clicking "unsubscribe" on our emails or asking your practice to change your preferences. If you have provided your consent, please view our cookie policy for information on how you can reject cookies and opt out of targeted advertising online. You can also ask us to stop contacting you by telephone for marketing purposes, at any time, by letting us know.

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

4. Who we share your personal data with

As well as using service providers to support our business (data processors), we might share information with other organisations who are also Controllers. This may include:

- Royal College of Veterinary Surgeons, (a) in our legitimate interests to protect animal welfare and better our clinics' practicing standards; or (b) consent (where consent is required by applicable law); or (c) as necessary to comply with applicable laws
- Other veterinary specialists, laboratories and animal health providers and agencies, where the personal data cannot be anonymised, (a) as necessary to perform a contract with you, for example, to assist with diagnosis of animals; or (b) in our legitimate interests to protect animal welfare; or (c) consent (where consent is required by applicable law) for the advancement of veterinary medical research
- Insurance and related companies, and other professional and legal advisors as necessary in our legitimate interests in running a successful business
- Debt recovery agencies as necessary to perform a contract with you or in our legitimate interests in running a successful business
- Law enforcement, fraud prevention agencies and other public authorities as necessary to comply with applicable law
- Advertisers and advertising networks that require the personal data to select and serve relevant adverts to you (such as Meta Ads Manager) with your consent
- Companies approved by you (such as social media sites) as necessary to perform a contract with you or take steps requested by you prior to entering into a contract, or in our legitimate interest to run a successful business

Where any part of our business is outsourced, sold, merged, or subject to bankruptcy or other business transaction or re-organisation and where permitted by law, we will share your personal data with the new provider so that services can continue to be provided to you as necessary in our legitimate interests to run a successful business.

5. International Transfers

IVC Evidensia is multinational company, and some of our business processes may take place outside UK, including where we transfer your personal data to our affiliates or the organisations noted above which are located outside the UK. We currently use service providers located outside the UK, for example, in the United States and India.

Where we transfer your personal data outside the UK, we ensure that your personal data continues to be protected to the same standards by:

• ensuring that the importing country has been agreed by data protection regulators to provide an adequate level of protection; *or*

• making sure that regulator-approved contracts are in place to protect your personal data and rights (e.g. the international data transfer agreement/addendum) which ensure your personal data receives adequate protection.

Please contact us at <u>privacy@ivcevidensia.com</u> if you want further information on the specific safeguards used by us when transferring your personal data out of the UK.

6. Keeping your personal data secure

We have security and other measures in place to help protect your personal data and limit how it can be accessed or used, and to identify and handle suspected breaches of personal data and other security threats.

If you would like to know more about how to protect your information and your computer and devices against fraud, identity theft, viruses and other online problems, please visit <u>Get</u> <u>Safe Online</u>. Get Safe Online is supported by HM Government and leading businesses.

7. Data retention

We will retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including:

- for the purposes of satisfying any legal, regulatory, tax or reporting requirements;
- as needed to defend or pursue legal claims; and/or
- as required for legitimate business purposes (such as administering services to you).

In most cases, your personal data will be retained for a maximum of 7 years from the date at which we stopped providing services to you.

8. <u>Being in control of your own information</u>

Under the UK GDPR and Data Protection Act 2018, you have some important rights available to you. In connection with these rights, you may, in certain circumstances:

- Request information about how we are using your personal data
- Request a copy of your personal data
- Request that we correct any personal data that is inaccurate
- Request that we delete your personal data
- Where you have been asked for and given us your consent to processing of your personal data, withdraw that consent
- Request that we stop processing all or part of your personal data
- Exercise a right to object or restrict or suspend us from processing your personal data. If you do object to, restrict, or suspend our processing of your personal data, we may not be able to provide services to you
- Request that we transfer elements of your personal data to another company

Some of these rights may be limited in some circumstances, or subject to exemptions. If you want to exercise your rights, or to make a complaint, please complete a <u>Rights request form</u> or contact us at <u>privacy@ivcevidensia.com</u>.

If we cannot resolve a complaint as you would wish, you may also make a complaint to the UK Information Commissioner's Office ("ICO") via their website.

9. Changes to this privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review and will update it from time to time. If we do, we will post the revised version here and change the date above and/or contact you directly where we deem appropriate to do so under applicable law. You should check here regularly for the most up-to-date version of the notice.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by contacting <u>privacy@ivcevidensia.com</u> or by visiting/contacting us directly.