

# D.S. McGregor and Partners LTD

## Privacy Notice

Data Protection Act 1998&EU General Data Protection Regulations 2018.

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## 1. INTRODUCTION

Here at D.S McGregor and Partners Ltd we strive to protect all of our staff and client's personal data in accordance with all Data Protection laws and regulations. We are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified then you can be assured that it will only be used in accordance with this privacy statement.

We may change this policy from time to time. You should check our website to ensure that you are happy with any changes. This policy is effective from 25/05/18 and is available on the DSMCG Website.

This privacy notice is with reference to the Data Protection Act 1998, and the EU General Data Protection Regulation 2018, it provides you with details of how **D.S. McGregor and Partners Ltd** collect and process your personal data.

**D.S. MCGREGOR AND PARTNERS LTD** is the data controller and we are responsible for your personal data held on our practice management systems.

Our email address is [admin@dsmcg.co.uk](mailto:admin@dsmcg.co.uk)

Our office locations are:

THURSO OFFICE	WICK OFFICE
D.S. MCGREGOR AND PARTNERS LTD Veterinary Surgery Janet Street Thurso Caithness KW14 7EG	D.S. MCGREGOR AND PARTNERS LTD Veterinary Surgery Airport Industrial Estate Wick Caithness KW1 4QS

## 2. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted to do so. The most common uses of your personal data are:

### For Clients

- Where we need to set up an account for you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- When we need to transfer information with regards to a veterinary referral to a third party
- Where we need to comply with a legal or regulatory obligation.
- Where you have made a claim to an Insurance Company and they require us to share your information.

### For Staff

- Where we need to be able to register your details for payroll, tax and national insurance
- Where we need to register you for professional Indemnity
- Where we need to manage subscriptions on your behalf with professional organisations
- Where we need to re-imburse you for expenses incurred

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email, phone or text message. You have the right to withdraw consent to marketing at any time by emailing us at [admin@dsmcg.co.uk](mailto:admin@dsmcg.co.uk)

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would be grateful if you contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at [admin@dsmcg.co.uk](mailto:admin@dsmcg.co.uk)

### **Purposes for processing your personal data**

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at [admin@dsmcg.co.uk](mailto:admin@dsmcg.co.uk) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity (Clients)	Type of data	Lawful basis for processing
To register you as a customer	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To deliver veterinary goods and services to clients for the benefit of their animals	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Legal responsibility</li> <li>• Necessary for our legitimate interests</li> </ul>
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests</li> </ul>
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests.</li> <li>• Necessary to comply with a legal obligation</li> </ul>
To deliver relevant content and advertisements to you and to measure and understand the effectiveness of our advertising	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests.</li> <li>• On the basis of consent</li> </ul>
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>• Anonymised data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests.</li> </ul>
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Marketing</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests.</li> <li>• On the basis of consent</li> </ul>

Purpose/Activity (Staff)	Type of data	Lawful basis for processing
To register you as an employee	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Bank Details</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Processing payment of salary</li> </ul>
To register statutory payments with HMRC	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial &amp; Bank</li> </ul>	<ul style="list-style-type: none"> <li>• To enable payment of Taxes and National Insurance</li> <li>• To comply with Legal responsibilities</li> <li>• Necessary for our legitimate interests</li> </ul>
Payment of private and auto-enrolled pension payments	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests</li> </ul>
To register with professional bodies and organisations	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests</li> <li>• Used to provide support and indemnity cover</li> </ul>
Sick notes and Emergency Contact details	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Emergency Contacts</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests.</li> </ul>
Appraisal and disciplinary records	<ul style="list-style-type: none"> <li>• Identity</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests</li> </ul>
Workplace references	<ul style="list-style-type: none"> <li>• Identity</li> </ul>	<ul style="list-style-type: none"> <li>• For our legitimate interest</li> <li>• On the basis of personal staff member request.</li> </ul>

## Marketing communications

You may receive marketing communications from us if you have:

- (i) requested information from us or purchased goods or services from us; or
- (ii) if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- (iii) in each case, you *have not* opted out of receiving that marketing.

D.S. McGregor and Partners Ltd, will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by emailing us at [admin@dsmcg.co.uk](mailto:admin@dsmcg.co.uk) and we will send you a link through the Assisi portal so you can update your preferences

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other legal obligations.

### 3. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 2 above:

- Service providers who provide IT and system administration services. ( EG: Practice Point who is the supplier of our practice management system.)
- Professional advisers including solicitors, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the EU General Data Protection Regulations 2018. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

### 4. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA). However some of our cloud based storage systems may use storage locations outside of the EEA. For the cloud based systems we will make every effort to ensure your data is protected by regulations comparable to the latest UK legislation.

Where we are obliged to make contact and share your personal data with organisations outside of the EEA (such as import or export of animals) we will require your written consent for doing so.

## **5. DATA SECURITY**

We have put in place appropriate security measures, antivirus, malware protection to prevent your personal data from being accidentally lost, altered, disclosed or accessed in an unauthorised way. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a legitimate interest to use such data. They will only process your personal data on our instructions and they are subject to a duty of care, confidentiality and professionalism at all times.

We have put in place procedures to deal with any suspected personal data breach and will notify you as soon as the breach has been identified. We will also notify the ICO and any other applicable regulator of a breach where we are legally required to do so. This will be recorded electronically / manually in accordance to the Regulatory requirements and all information given to the ICO in relation to the incident when requested.

## **6. DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By UK law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data immediately after ceasing business with D.S. McGregor and Partners Ltd: See below for further information. We must however adhere to the UK Laws and may need to retain the financial information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 7. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent. You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights>

If you wish to exercise any of the rights set out above, please email us at **admin@dsmcg.co.uk**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

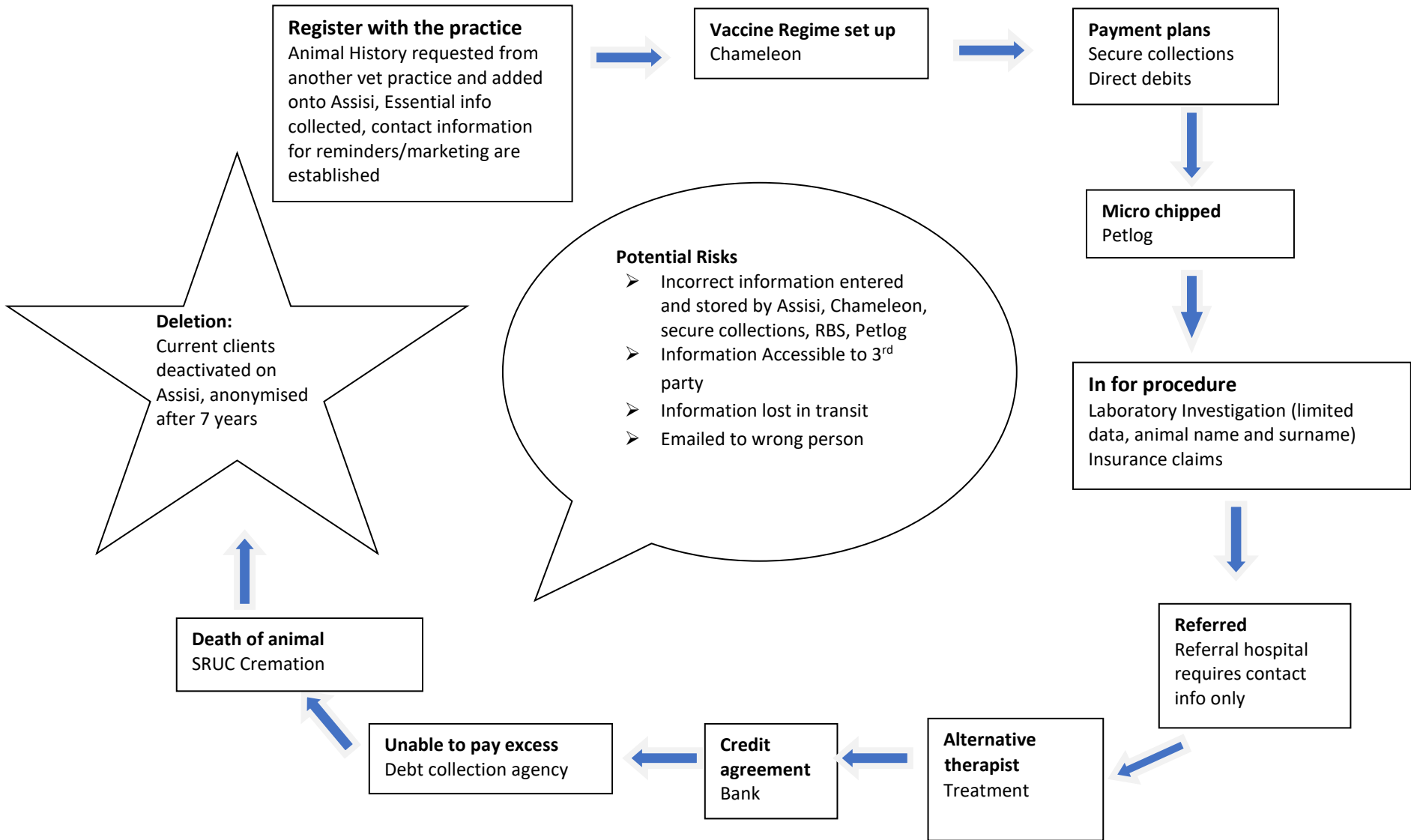
We will need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request, so we can deliver our response.

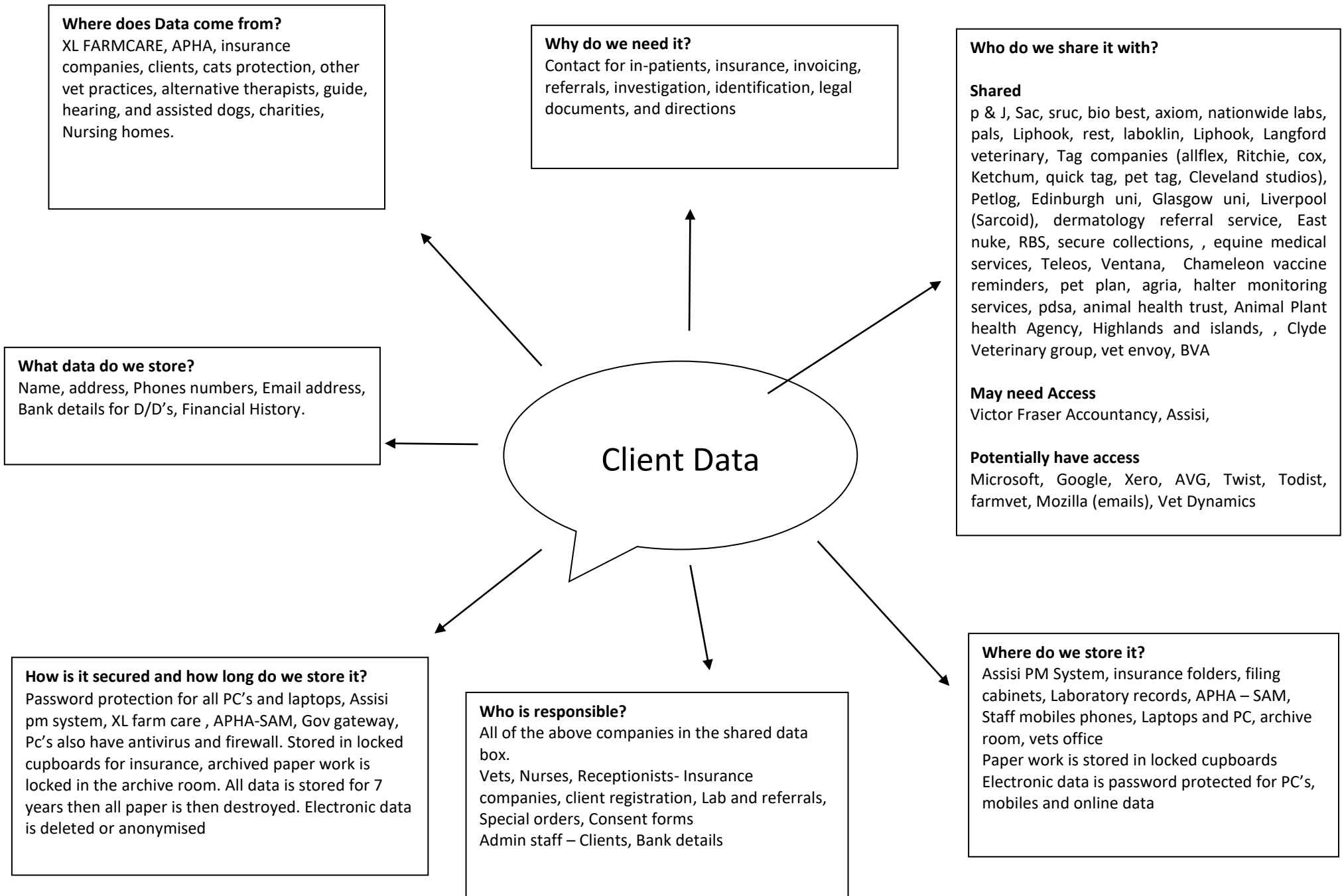
We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this instance, we will notify you and keep you updated.

If you would like further information, have any concerns with regards to our Data Protection Policy then please do not hesitate to contact us at [admin@dsmcg.co.uk](mailto:admin@dsmcg.co.uk)



**Data tracking for clients**





**Data tracking for employees**

