



# Elham Valley Referrals -Website Privacy Notice

## 1. INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data through your use of our site, [www.elhamvalley.com](http://www.elhamvalley.com).

By providing us with your data, you warrant to us that you are over 13 years of age.

Elham Valley Referrals is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

We have appointed a Data Protection Manager who is in charge of privacy related matters for us. If you have any questions about this privacy notice, please contact the Data Protection Manager using the details set out below.

### 1.1 Contact Details

Full name of legal entity: Elham Valley Referrals

Name or title of Data Protection Manager **Katherine Elks**

Email address: [katherine@elhamvalley.com](mailto:katherine@elhamvalley.com)

Postal address: 24 Barham Business Park, Elham Valley Road, Barham, Canterbury, Kent CT4 6DQ

Telephone number: **01303 840499**

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 should be grateful if you would 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 [reception@elhamvalley.com](mailto:reception@elhamvalley.com).

## 2. WHAT DATA DO WE COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND WE PROCESS IT

**Personal data** means any information capable of identifying an individual. It does not include anonymised data.

We may process certain types of personal data about you as follows:

- **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.
- **Customer Data** that includes data relating to any purchases of goods and/or services such as your name, title, billing address, delivery address, email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and/or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.
- **Marketing Data** - Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.

Generally, we do not rely on consent as a legal ground for processing your personal data.

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 [reception@elhamvalley.com](mailto:reception@elhamvalley.com)

### 2.1 Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

## 3. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms or by communicating with us by post, phone, email or otherwise.
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below :
  - A referring local GP vet
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested data, we may have to cancel a product or service but if we do, we will notify you at the time.

### 3.1 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at [reception@elhamvalley.com](mailto:reception@elhamvalley.com).

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

### 3.2 Marketing communications

We do NOT share your personal data with any third party for marketing purposes.

## 4. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, 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.
- Third parties to whom we may sell, transfer, or merge parts of our business or our assets.

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 law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## 5. INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

## 6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 7. DATA RETENTION

We will keep your personal data for as long as is necessary to fulfil the purposes for which we collected it – due to the possibility of re-referral to us, we normally keep data for the lifetime of your pet.

We may retain your data to satisfy any legal, accounting, or reporting requirements so for example we need to keep certain information about you for 6 years after you cease to be a client for tax purposes. In addition we may retain data concerning your pet, treatment received and the outcome of such treatment solely for medical and scientific research. Should a need arise to contact you regarding any research, we will do so directly.

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.

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

## **8. YOUR LEGAL RIGHTS**

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) 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 [reception@elhamvalley.com](mailto:reception@elhamvalley.com)

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 clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may 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 to speed up our response.

We 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 case, we will notify you.

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 should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

## **9. THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **10. COOKIES**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.