



Castle Veterinary Centre Ltd

61-63 Castle Boulevard

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www.castle-vets.com

GENERAL DATA PROTECTION REGULATIONS – CLIENT INFORMATION

BACKGROUND:

In order to provide healthcare for your companion animal(s) and fulfil the requirements of the Royal College of Veterinary Surgeons (RCVS), Castle Veterinary Centre (CVC) records and processes some personal data* about yourself and any person(s) designated as co-keepers/carers of the registered patient or whom you inform us may act on your behalf in presenting/enquiring after the patient. General Data Protection Regulations (GDPR) require that CVC informs you what data we collect, how it is stored and processed, what we do to protect the privacy of your data and what your rights are in relation to this data.

*(*any information which identifies you or which can be identified as relating to you personally.)*

DATA HELD:

CVC will only collect and process personal data under the legal bases of GDPR, principally to fulfil its “legitimate interests” of providing veterinary healthcare and meeting the requirements of RCVS. The data held includes your name, address and telephone contact details, plus those of others authorised by yourself to act on your behalf. Where it is applicable to the care of a patient, other data may be recorded, e.g. if you tell us that you will be away so as to authorise a pet-sitter to take responsibility for a pet or where personal circumstances affect clinical decisions e.g. an injury prevents you medicating a patient, necessitating the use of long acting injections rather than tablet therapy.

CVC does not routinely accept or make e-mail contact with clients. E-mail addresses previously held have been deleted prior to the introduction of G.D.P.R and any client contact made with or by the practice by e-mail thereafter must carry specific oral or written consent which will be recorded on the patient files.

CCTV may operate at certain times within CVC premises, to help provide security and protect both you and CVC staff. Any record will be viewed only when necessary to detect/prevent crime and any footage will be stored only temporarily. The CVC website does not record any information about its visitors.

Where payment is made by credit/debit card, the merchant’s copy of the transaction confirmation details some of your banking data. This is kept securely and shredded as soon as CVC’s obligations to keep them for tax purposes have been met.

On occasions CVC may collect financial data such as credit/debit card details where a credit payment agreement is made. Your permission for processing this data will be sought and recorded as part of the financial contract, and the details destroyed once the payment agreement has been satisfied.

STORAGE OF DATA:

Personal data that you provide will be stored on paper records as part of the client/patient file. To comply with the RCVS guidelines, the records are kept for a period of seven years after an animal ceases to be an active patient of the practice. After this period the records are destroyed by shredding.

PROTECTION OF DATA:

CVC stores your data in areas accessible only to CVC staff who receive data protection training, and the premises are locked outside of opening hours. We believe this offers maximum security for the protection of your personal data. Product labelling and the addressing of legitimate client contact is computer based, but the data processing involved is accessed via *(continued)*

VAT No: 657 9652 78

A company registered in England. Company number 0475928



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a unique patient code and the computer system used is not networked and so cannot be accessed by outside “hackers”. On such occasions that e-mail addresses are, with your specific consent, kept, CVC uses software to protect such data from “hackers”. Should a security breach be suspected, clients whose personal data may be at risk will be informed at the earliest opportunity according to GDPR guidelines.

THIRD PARTIES:

CVC will not sell your personal data or provide it to third parties without your specific and recorded oral or written consent. The only exceptions to this would be on the basis of “legal or vital interest” i.e. to protect a person or property, information may be passed to the police, or to a welfare agency, e.g. R.S.P.C.A under the Animal Welfare Act to protect an animal. Similarly, in a case e.g. of suspected rabies, data may be legally forwarded to relevant agencies on the legitimate basis of “public interest”.

Where patient samples are sent to outside laboratories, identification will be via a unique patient code. Similarly, where “product offers” necessitate a link with the patient, this will be provided to the third party as the patient code, allowing CVC but not the commercial agent, to identify patient details. Occasionally it may be necessary to forward personal data to a third party on the legitimate basis of providing veterinary services, e.g. arranging referral of a patient to a specialist or to complete a pet health insurance claim. On such occasions the third party may request e-mail contact. If you would prefer personal data to be sent by post rather than electronically then please inform CVC staff when the transfer of such data is requested.

Should a third-party contact CVC requesting the transfer of personal data e.g. another veterinary practice requesting clinical notes on the transfer of a patient or an insurance provider requesting information prior to issuing pet health insurance then you will be contacted and specific oral/written consent for the transfer be sought and recorded before any data is processed.

YOUR RIGHTS:

GDPR give individuals the right to view personal data stored by the practice; to the rectification of incorrect data and to the erasure of data. Within veterinary practice, erasure is only permissible once RCVS requirements re the duration of storage have been met.

If you have any queries about the personal data we keep at CVC, its storage or its processing, please speak to a member of staff who will forward your concerns to the Data Protection Officer. A meeting will be arranged within the guidelines of GDPR.

CVC will amend and update its privacy policy to ensure that it remains up to date and the current version will be available in the practice.

(last update June 2018)

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