

# **Privacy Policy**

## **Introduction**

Yan Farm Health Limited (“we”, “us” or “our”) is committed to respecting your privacy and is committed to protecting your personal data.

We are a limited company registered in England & Wales with company number 13125113, and we are registered as a controller with the Information Commissioners’ Office under number ZA881658.

## **1 Important Information and Who We Are**

### **Purpose of this privacy policy**

This privacy policy gives you information on how we collect and process personal data including any data which may be provided to us through our website [www.yanfarmhealth.co.uk](http://www.yanfarmhealth.co.uk), from our dealings with clients and suppliers, and from people who get in touch with us for any reason, including by phone or email. It will inform you how we use your personal data, the conditions under which we may disclose your personal data to others, how we keep your personal data secure and sets out your privacy rights and how the law protects you.

It is important that you read this privacy policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **Controller**

Yan Farm Health Limited is the data controller and is responsible for your personal data. We gather and process your personal data in accordance with this privacy policy, and in compliance with relevant data protection laws and regulations.

### **Contact details**

If you have any questions about this privacy policy, our privacy practices or to exercise any of your legal rights, please contact us in one of the following ways:

Telephone: 01539 327000

Email: [office@yanfarmhealth.co.uk](mailto:office@yanfarmhealth.co.uk)

Postal address: The Workshop, Bleaze Farm, Old Hutton, Kendal LA8 0LU, England

### **Changes to the privacy policy**

We keep our privacy policy under regular review. We may change this privacy policy from time to time by updating this page. Additional information may be provided on specific occasions when we are collecting or processing personal data about you, and you should also refer to those.

### **Your duty to inform us of changes to your personal data**

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. If you wish to review and/or update personal data we hold about you, please contact our data protection manager using the details above.

### **Third-party links**

Our website, social media pages and other resources 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. You should read any policies and statements on every website you visit.

## **2 The Data We Collect About You**

Personal data means any information about an individual from which that person can be identified. It does not include which has been anonymised such that a person's identity is removed.

We collect, use, store and transfer different kinds of personal data.

The categories of personal data that we collect from you may include:

- **Identity & Contact Data** such as name, title, home or business address, and personal or business phone numbers and email addresses.
- **Client Data** including personal data in connection with and as a result of, providing veterinary services and products (aside from contact data). For example, we may hold data about employees, workers and other third party advisors to our client's businesses. We may also hold financial and business information about your business which may also constitute your personal data.
- **Financial Data** including information you may need to provide us with to make a payment. This may include credit/debit card information, and your bank account details.
- **Technical Data** including internet protocol (IP) address, access times, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website and/or social media pages. This may also include information about how you use our website, social media pages and services.
- **Marketing Data** includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Technical Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can

directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We rarely collect any special categories of personal data about you (such as 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).

### **If you fail to provide personal data**

Where we need to collect personal data by law, under the terms of a contract we have with you or the business you represent, or for another lawful reason and you fail to provide that data when requested, it may restrict us from offering some or all of our services. It may also prevent us from properly dealing with a request or enquiry you have made, or we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to stop providing you with goods or services but we will notify you if this is the case at the time.

## **3 How Is Your Personal Data Collected?**

Personal data is collected in a number of ways. We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity & Contact, Financial and Marketing Data by filling in forms or by corresponding with us by post, phone, email, face to face meetings or otherwise. This includes personal data you provide when you:
  - apply to become a client of the practice;
  - request us to collect payment of your invoices by direct debit;
  - request marketing to be sent to you; or
  - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, 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 similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy or further details.
- **Third parties.** We may receive personal data about you from third parties such as other professionals you have engaged to advise your business, or governmental organisations such as DEFRA.

## **4 How We Use Your Personal Data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary to comply with a legal obligation.
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
- Where you have consented to us using your personal data in the applicable way.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of the main ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that 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 contact us 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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register new clients	(a) Identity & Contact (b) Client	Performance of a contract with you
To provide clients with goods and services, including: (a) Delivery of goods and services (b) Manage payments, fees and charges	(a) Identity & Contact (b) Financial (c) Client	(a) To comply with a legal obligation (where provision of our services is required by law) (b) Performance of a contract with you (b) Necessary for our legitimate interests (e.g. to manage the size of your account with us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms of business or privacy policy (b) Collecting and recovering money owed to us	(a) Identity & Contact (b) Financial	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (e.g. to recover sums owed to us)
To make suggestions and recommendations to you about goods and/or services that may be of interest to you,	(a) Identity & Contact (b) Client (c) Marketing (d) Technical	Necessary for our legitimate interests (e.g. to increase our service offering and to grow our business)

including sending you vaccine reminders or suggestions for schemes you may wish to join		
To comply with our legal and regulatory obligations	(a) Identity & Contact (b) Client	(a) Necessary to comply with a legal obligation (b) Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us
To manage non-client relationships	(a) Identity & Contact (b) Client	Necessary for our legitimate interests (to either retain services directly or otherwise because it is for the benefit of our clients, e.g. to facilitate proper working relationship with third party professionals).
To administer and protect our business, website and social media pages (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity & Contact (b) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website and social media content and advertisements to you and measure or understand the effectiveness of that advertising	(a) Identity & Contact (b) Technical (c) Marketing	Necessary for our legitimate interests (to study how clients use our website and social media pages, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, social media pages and marketing	(a) Technical (b) Marketing	Necessary for our legitimate interests (to keep our website and social media pages updated and relevant, to develop our business and to inform our marketing strategy)
To recruit staff, and offer work placements	(a) Identity & Contact (b) Special Category data (e.g. health, in order to facilitate an interview or work placement)	Your consent (i.e. we will rely on the fact that you send this information to us as your agreement to us using it for this purpose).

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity & Contact, Client, Technical and Marketing Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

## **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. For more information about the cookies we use, please see our Cookies Policy.

## **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 get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5 Disclosures of Your Personal Data**

We do not and will not share or disclose your personal data with unconnected third-parties without your consent, unless it is for purposes specified in this privacy policy or if there is a legal requirement.

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.
- Government bodies that require us to report processing activities.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6 International Transfers**

We do not generally transfer your personal data outside the United Kingdom. However, where we do so, we do in accordance with one of the relevant transfer mechanisms or rely upon one of the applicable derogations or exceptions.

## **7 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. 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.

## **8 Data Retention**

### **How long will you use my personal data for?**

We will only 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, accounting or reporting requirements. We will take account, where relevant, of any practice notes as may be issued by our regulator or insurers given the regulated nature of our profession, as well as relevant statutory and other legal requirements and considerations. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

In so far as the personal data pertaining to job applications or work experience placements is concerned, we typically retain that information for a period of 6 months from the date on which we receive the application, or for those invited for interview, for a period of 6 months from the date on which a decision is communicated. However, we retain the personal data of work experience applicants for longer periods, taking account of the length of those application procedures as a whole and the fact that typically, we receive applications for placements several months in advance.

We review the personal data held in our marketing database so as to take account of any marketing preferences we may receive such that anyone from whom we receive an unsubscribe request, will be removed from that database.

In some circumstances you can ask us to delete your data: see “your legal rights” below for further information.

## **9 Your Legal Rights**

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

- **Request access** to your personal data (a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of your personal data. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have this right where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest basis and if the processing impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data: if you want us to establish the data’s accuracy; where our use of the data is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer require it as you need it, to establish, exercise or defend legal claims; or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request a data transfer.** We will provide to you, or your chosen third party, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

#### **No fee usually required**

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. Alternatively, we may refuse to comply with your request in these circumstances.



### **What we may need from you**

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.

### **Time limit to respond**

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 and keep you updated.

## **10 Lodging a Complaint**

We will only process your personal data in compliance with this privacy policy and all relevant laws and regulations. If you have cause for concern or are unhappy in any way, however, you may lodge a complaint with us using the contact details set out above.

You also have the right to make a complaint at any time 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, however, appreciate the chance to deal with your concerns before you approach the ICO.