

RVC Client Privacy Notice

A privacy notice is a statement that discloses some or all of the ways we as a 'Data Controller': gather, use, disclose, and manage your personal data.

What is a 'Data Controller'?

The Data Controller is the body – in this case the Royal Veterinary College (RVC) – that determines the purposes for which and the manner in which any personal data are, or are to be, processed.

What is 'personal data'?

Under UK Data Protection law "Personal data" means any information relating to an identified or identifiable living individual. "Identifiable living individual" means a living individual who can be identified, directly or indirectly, in particular by reference to (a) an identifier such as a name, an identification number, location data or an online identifier, or (b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

What is a 'data subject'?

A 'data subject' is a natural living person whose personal **data** is processed by a **controller** or processor. So when we hold and process personal data about our clients they are 'data subjects'.

What is 'Special Category Data'?

The law provides a separate definition for "Special Category Data". This relates to information concerning a data subject's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences. You can expect the RVC to put in place additional safeguards when processing any Special Category Data that we obtain from you and to ensure that we have a robust legal bases for doing so.

This Privacy Notice and the RVC's data protection obligations under UK Data Protection Law.

The RVC will use your personal data to carry out the necessary tasks for the administration and management of your interactions with our clinical services. This is likely to include your contact details, payment details, and details of your insurance provision which will be necessary for us to carry out clinical work at your request, as well as your Date of Birth (DOB). It may also include a record of your consent to be contacted by the RVC for a range of purposes which may include: appointment or vaccination reminders, events or clinical services relevant to the care of your companion, working or production animal, requests to take part in research studies in support of veterinary medicine or communications from the Animal Care Trust which is a charity that supports our activities. In certain circumstances we may be obliged to share your information with third parties such insurance companies, debt collection agencies, microchip registration companies, the RSPCA, the police or the courts.

In doing so the RVC is defined as a **Data Controller** in UK Data Protection Law and this means that we are legally responsible for the personal data we collect and hold about you.

One of our responsibilities is to tell you in more details about the different ways in which we use your personal data. This Privacy Notice is designed to provide further information about these uses now if you are a client of the RVC's veterinary services. In addition to the information in this notice, you may be given further information about the uses of your personal data when you use specific services and facilities offered by the RVC.

Our legal bases for processing your personal data

Where we are processing your personal data for the purposes of the clinical services we are providing to you we do so on the legal bases of *contract*.

Where we are processing your data for other purposes for which we have sought your consent (e.g. marketing, research) then the legal bases for processing that data is the *consent* that you have provided.

If we are processing your data in relation to the research activities of the RVC then the legal bases will either be *consent* if we need to contact you or *public task* if authorised staff or students are reviewing clinical data which may have some client details embedded in or attached to it.

If we are obligated to share your personal data with the police, relevant bodies such as the RSPCA or the courts then having confirmed that there is a legitimate bases for sharing we will do so on the bases of *legal obligation*.

If we have robust grounds for suspecting animal cruelty or abuse then we will share your personal data with the relevant bodies (e.g. The police, the local authority inspector or the RSPCA) on the bases of our legitimate interests as a provider of Veterinary medicine.

Where we share information with third parties they will be considered Data Processors and we will ensure that they are compliant with their obligations under UK Data Protection Law.

How we use your personal data.

Your personal information is used as permitted or required by law and for a range of clinical, research, educational and administrative purposes in relation to your engagement of our clinical services which are provided by:

The Queen Mother Hospital for Animals, the Beaumont Sainsbury Animal Hospital, our Equine Referral Hospital, the Equine Practice, our Farm Animal Clinical Centre, and our Diagnostic Laboratory Services.

We also use carefully vetted 3rd parties to process your appointments and enable online payments these are VetStoria <https://www.vetstoria.com/>, Stripe www.stripe.com and WorldPay <https://www.worldpay.com/>

Communications

- To enable effective communications with you throughout your engagement of our clinical services.
- If you have consented we may communicate with you about the Royal Veterinary College, about our hospitals and clinical services, about our charity - the Animal Care Trust or in order to ask you to participate in research studies in support of the care and treatment of animals and the education of the next generation of Veterinary Surgeons and Nurses.

Clinical

- To administer the clinical services we are providing to you and your animal. This will include consents to some forms of clinical engagement or pathological services. Clinical services we provide include treatments, examinations, therapy, surgery and other clinical procedures,

blood tests, vaccinations, post mortems, pet passports or our microchipping service – more details of all of our services are provided on our hospital websites.

- Where we use third parties to provide data storage of clinical or related services (e.g. microchipping or the providers of our clinical software) we may share limited personal data with them in order to manage the service to you.
- Clinical outcomes and reports will be provided to referring Veterinarians.

Animal Welfare concerns

- We will normally see permission to disclose your personal data to the relevant authorities if we consider that animal welfare or the public interest is compromised. If a client refuses to consent, or seeking consent would be likely to undermine the purpose of the disclosure, the veterinary surgeon along with hospital management will have to decide whether the breach of the data protection act is justified. In these circumstances and where the veterinary surgeon considers that animal welfare or the public interest is compromised, client confidentiality may be breached and appropriate information reported to the relevant authorities. Some examples may include situations where an animal shows signs of abuse; where a dangerous dog poses a risk to safety; where child or domestic abuse is suspected; where there is some other significant threat to public health or safety or to the health or safety of an individual; or where the information is likely to help in the prevention, detection or prosecution of a crime.
- Further guidance from the Royal College of Veterinary Surgeons on client confidentiality can be found here: <https://www.rcvs.org.uk/setting-standards/advice-and-guidance/code-of-professional-conduct-for-veterinary-surgeons/supporting-guidance/client-confidentiality/>

Finance

- **Fees:** Your personal data will be used to process the fees for the clinical veterinary services we provide.
- **Debt:** Your personal data may be shared with third parties attempting to recover debt on behalf of the College where internal debt recovery procedures have been unsuccessful. The RVC may also include details of an outstanding debt in any reference or verification of results supplied to a third party.
- **Insurance:** The RVC may share your personal data with its insurers for the purpose of responding to (and potentially meeting the costs of) a claim that you make. In the event of a claim, the College will share some personal data with your insurers for the purposes of administering your claims.
- **Social Security information:** We may use your Social Security information to assess forms of financial support that may be available to you.

Research

- Our clinical staff or our students may access clinical records that have personal data embedded in them or attached to them for the purposes of research in support of the

enhancement of the care and treatment of animals, and the understanding and management of injury and disease.

Safety and Security

- If you are on the RVC's premises including parking areas at either of our sites (Hawkshead Lane or Camden) then your images and those of your car may be captured on CCTV. We do this in order to keep our premises and their contents secure and help ensure the safety of both our clients, patients, staff and students.

Promotional, operational and educational materials / filming and photography

- Images (film or photography) maybe captured incidentally by us or by third parties (such as the BBC) at events or on Campus or more formally with your consent for promotional materials for a variety of applications including print, broadcast, and digital. In some situations your image may also be captured in crowds/background. We will endeavour to clearly signpost when filming or photography is taking place but please be aware that these images may be used. From time to time we may also take individual photographs of clients and in this case, we would seek your permission to use such images.

Systems and Services

- **IT systems:** Our IT support services and third party software suppliers such as RxWorks, will from time to time have access to your personal data in the course of their normal maintenance, testing and development functions.
- **Phone call logging:** When you make a call to one of our hospitals main numbers we will notify you that the we record our incoming and outgoing calls. We record calls both incoming and outgoing calls to improve our customer services and also to keep a record of conversations so that complaints, grievances or concerns either from you or us can be investigated and resolved effectively.

How long will we keep your personal data?

Where we are processing your personal data for the purposes of the clinical services and related activities (research and education) we retain this data securely for a period at least 7 years and normally longer in order to assist with our research and education activities. Some details such a credit card details will only be retained for as long as we require them to process financial transactions. Recorded calls are kept for 12 months unless required for the processing of complaints or legal actions.

Where we are processing your data for other purposes for which we have sought your consent (e.g. marketing, research) then we will keep it for as long as we continue to have your consent. We will update our records by re seeking consent on a regular basis or through you telling us you no longer wish us to process your data (you may use unsubscribe options on emails or call our hospitals and ask, or email: data@rvc.ac.uk).

How can I access my personal information and exercise my other rights in relation to personal data that the RVC holds about me?

Under UK Data Protection Law you have the right, subject to certain exemptions, to access the personal data that is held about you. You also have a range of further rights as follows: Right to be informed; Right of Rectification; Right of Erasure, Right to be Forgotten; Right to Restrict Processing; Right to Data Portability; Right to Object; Rights in relation to Automated Decision Making and Profiling. Details of your rights are set out in more detail in the RVC's Data Protection policy which can be found on our [website](#).

Who regulates the use of my personal information?

The College maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with Data Protection Law. The RVC's registration number is Z6779018. Please see the [Information Commissioners Office](#) website for details.

Who do I contact with questions?

If you have any questions or concerns about how your personal data is used, or you wish to exercise one of the rights outlines above please contact the College's Data Protection Officer: data@rvc.ac.uk

Further information, including our Data Protection Policy, can also be found on our website

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