

## **Privacy Policy**

Here at frank. we understand that your information is valuable to you and the trust you place in us to look after it is not something we take for granted.

The policy outlined below outlines why, when and how we collect information about you and your pet.

### **Summary**

We will only ask you for information which is absolutely necessary for us to help you and that which you have consented to providing,

We won't send you any unsolicited communications via e-mail or post unless you give us express permission to do so.

Due to the nature of how we operate with insurance companies and other veterinary surgeons, it is important that we are able to exchange information relating to you and your pet. In these situations, every measure possible will be taken to ensure the security of your information.

Data is protected internally through a range of technological and organisational processes which are reviewed on a regular basis to ensure their integrity.

You retain the right to control your information and may request that we delete it at any point provided it will not contravene any superseding legal or professional obligations such as those to HMRC or the Royal College of Veterinary Surgeons who govern the professional behaviour of veterinary surgeons and veterinary nurses.

We will securely hold your information only for as long as is necessary, it will be deleted from our records once it is no longer required for us to hold it.

### **1. What kind of information we collect**

In order to effectively provide medical care, we need to keep accurate client and patient records. The information we hold is principally for clerical and communication purposes, this will include your name, address, phone number and email address. For your pets this will be a lot more extensive as it

will include their medical history. We will never request any information from you which we don't need in order to provide you with the best veterinary care possible.

## **2. When your information will be used**

There are several reasons why we need to use your and your pet's information; for clinical purposes, contact or payment being the most common. We may rely on further instances for when your information is used, the legal basis for which are as follows;

a) You have given consent to the processing your personal data for one or more specific purposes; - when you first visit us, we ask you for this consent so that we can take the details that we need to identify and treat your pet safely and also to take payment for our services.

(b) It is necessary for the performance of the services you have requested of us, including any ancillary services deemed necessary. The list of necessary ancillary services includes, amongst other things, identifying samples sent to the laboratory; identifying radiographic interpretation sent for further interpretation; helping you to complete insurance claim forms; communicating with your vet who will be responsible for your pet's care when they leave us.

(c) We need to process your data in order to fulfil any superseding legal obligations placed upon us; for example, all prescribed drugs have to be carefully recorded and labelled for safety.

(d) It is needed in order to protect yours or another relevant person's interests; for example, we need to identify your pet and the person responsible for their care in order to communicate effectively with you.

(e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in frank.

(f) Processing is necessary for pursuing any legitimate interests of frank., except when this may impede on the fundamental rights and freedoms of a vulnerable subject. Sometimes we would like to use images of your pet in case histories for social media and other promotional material, please see section 4 for further detail as well as our separate social media policy.

## **3. Sharing your information**

Due to the nature of veterinary care it is sometimes necessary to share information about clients and patients with third parties. For example, when discussing your pet's care with your veterinary surgeon or when disclosing medical histories to your insurance company. This will be done in a secure and recorded manner, records of data sharing will be available to you as part of any data request you make under section 7 of this policy.

Your data will not be directly shared with anyone else; the computer system we use is remotely accessible by the company who built it for us and the company who is responsible for the upkeep of

the system's hardware. Access will be on an intermittent basis and only when authorised by management in instances where it is necessary.

#### **4. Social media/ Marketing**

We intermittently share stories over social media about any particularly noteworthy patients who we have seen. Images and stories will be shared anonymously, changing or deleting names when necessary.

#### **5. Research and Development**

frank. Pet Surgeons is committed to research and development for the benefit of future pet's care. With your consent we will use information gained from your pets treatment and diagnostic images to help us in this. All case material will be made anonymous for this purpose.

#### **6. CCTV**

As part of our commitment to the security of your data as well as the Premises in which it is stored, we have installed CCTV cameras at various locations around the premises. Whilst your image is recorded when you are at frank., we will only keep these tapes for 30 days, and will only be kept longer should it be required for legal reasons.

#### **7. Keeping your data safe**

All data will be kept on a server located on site. Physical access to the server will be restricted to upper management and back ups will be stored securely

Clinical and support staff will have appropriate password protected access to information stored on our record system. If you have any concerns regarding the security of the systems in place to protect your information, please get in touch.

#### **8. Transferring information outside of the UK**

In the unlikely event that we transfer your data outside the UK, where data protection legislation may not exist in as stringent a manner, we will ensure the security of the destination in terms of data handling prior to delivery. However, just occasionally we may need to submit a lab sample overseas for analysis and it will need to be identified for your pet's safety. Also, as part of frank.'s commitment to research and development our specialist surgeons are often asked to present



information to audiences worldwide. We will ensure that any images used of your pet are made anonymous and are only used with your consent.

#### **9. Access to your information**

You may request a copy of the information we hold on you at any point, we will return a report on all the data we have pertaining to you and your pet within 1 month of the request being filed and your identity being verified.

Further, you may request alterations to your information if you believe it to be incorrect, out of date or if you feel we are no longer entitled to hold it. Deletion of information is your right, but this may be superseded by external legal obligations.

#### **10. Retaining your information**

frank. and the information which it holds about you are subject to multiple regulatory and legislative instruments dictating the manner in which we hold data and for how long we are able to hold it. This does mean however, that should you request we remove your data from our system that we may not be able to fully comply, as we may be required to hold some of your information for longer. Please be assured that we will be remove as much information as possible should such a request be made.

#### **11. Complaints**

Should you have any issues regarding our data security and wish to lodge a complaint, please approach us in the first place as we would like to help, and we can help you get in touch with ICO if you still feel it necessary.

#### **12. Changes to our privacy policy**

Please see our website for any changes made to the existing privacy policy.

#### **13. Contact information**

For any concerns relating to the above privacy policy please get in touch:

The logo for Frank Pet Surgeons features the word "frank." in a bold, lowercase, sans-serif font, positioned to the left of a solid orange square. To the right of the square, the words "Pet Surgeons." are written in a bold, uppercase, sans-serif font.

**frank. Pet Surgeons.**

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Email is the best contact, but our front of house team will be happy to help you if you ring our 24-hour number above.