Privacy Policy

This policy explains when and why we collect your Personal Data, how we use it, how we keep it secure and your rights in relation to it. We are the private limited company incorporated in England and Wales as Equine Reproductive Services (UK) Limited, whose registered office is 12 Alma Square, Scarborough, North Yorkshire, YO11 1JU under Company Number 08316943. We have notified the Information Commissioner of our data processing activities (registered under number ZA448655).

Given the developments in data protection law, in particular the adoption of the EU General Data Protection Regulation (GDPR), We (ERS(UK) Limited) would like to take this opportunity to clarify our role under the GDPR in the context of the services we provide to you. We consider ourselves to be a data controller of the personal data we collect in order to provide you with our services. As such we wish to inform you of the steps that we have take to achieve compliance with the GDPR.

We collect your personal data so we can keep in touch with you about the services we are providing you with. We will only ever collect, store and use your personal data when we have an identified purpose and reason to do so. The Information Commissioners Office refers to this as the ‘lawful basis’ for processing personal data.

The information we may have collected about you may include:

- Your name (and the name of your business)
- Your address (both personal or business)
- The location and identity of the person(s) caring for your animals
- Your animal details
- Telephone numbers (both landline and mobile)
- Your e-mail addresses
- Bank account details
- Technical information (upon visiting our Website)
- Video of you at our facilities

We do not routinely collect personal data which would be categorised as sensitive or ‘special categories of data’

ERS (UK) collects personal data:

- Directly from yourself, from your correspondence and phone calls with us.
- From individuals acting as your Agent (trainers, stud owners, livery yard owners and people caring for your animals)
- Through our website
- From our social media pages
- From third parties such as referring veterinarians
- From Closed Circuit Television (CCTV)

Cookies

The ERS(UK) website uses cookies, which is a string of information that a website stores on a visitor’s computer, which the visitor’s browser provides to the website each time the visitor returns. We use cookies to help identify and track visitors and their website access preferences. ERS(UK) may from time to time use such information to identify its visitors, and may collect statistics about the behaviour of visitors to its website. Website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using the ERS website. Our website has a detailed privacy policy specifically for website visitors.
How your data will be used and processed

ERS(UK) Limited process your data for a variety of reasons. Your data is used in the performance of our contract of service to you and in providing you with a bill for those services. As part of our service it is necessary for us to keep clinical records of the services provided and the drugs administered to your animals. As part of this we have a legal obligation to keep records of supply and administration of veterinary medicinal products.

Often we have a genuine and legitimate reason for contacting you. Legitimate Interests allow us to process your personal information if we have a genuine and legitimate reason and we are not harming any of your rights and interests. Contact may be made when we deem it to be in your best interest (or more appropriately in the best interest of your animals); we may need to keep you informed about our products and services. We may perform internal research and analysis to improve our services to our clients. Finally we may need to perform due diligence on potential clients and companies we work with. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

In addition you may consent to us using your data for a specific purpose. We use consent to send you information about our services by email, telephone, text message (SMS) or other communications application (WhatsApp). You have a legal right to prevent your information being used for marketing purposes and you can change your preferences to opt out of receiving marketing at any time by contacting us either by telephone or email.

We process personal data only for the purposes for which it was collected and not in a manner incompatible with those purposes. The personal data we hold is adequate, relevant and limited to what is necessary for the purposes for which it is processed. We endeavour for the data we hold to be accurate and updated when necessary.

Data storage and retention

All of your personal and animals’ clinical data in a software system called VetIT, operated by 2Sys limited (www.vetit.co.uk), the data is hosted by UKFast (www.ukfast.co.uk). This means your data is in the UK and is being looked after by an organisation that has a huge amount of experience in hosting data and protecting and securing it. UKFast has a number of recognised accreditations which may be viewed on their website. VetIT data and information is protected by Cisco master and slave firewalls. Full backups are held at UKFast. We can access your data through the application itself, which is encrypted, because it uses the https:// protocol. We manage access to the system through our user names with passwords.

Our staff are bound by the terms of their employment contract which contains standard agreements of confidentiality pertaining to client’s details and clinical records which is consistent with the requirements of the GDPR.

The record keeping requirements for Veterinary Medicinal Products, legally require us to keep records of supply and administration of veterinary medicinal products for 5 years. HM Revenue and Customs (HMRC) require our company to keep records for 6 years from the end of the last company financial year they relate to, this includes invoices and records of who we provided services to. Records will therefore be kept for a minimum of 6 years. Accounts which have been inactive i.e. we have not provided services to any animal under that ownership, for a period in excess of 6 years will be deleted, unless the account is in arrears, is marked as a bad debt or is subject to legal action or dispute. There is a legitimate interest for the company to get paid for the services it provides and the company may flag client records for reasons of bad debt without consent.

CCTV recording

ERS(UK) uses video surveillance to provide external security to its facilities and offices and this also provides a role in health and safety when personnel are dealing with horses in high risk situations. ERS(UK) legitimate interest in acquiring this data to protect its facilities, personnel and any animals it may be keeping on behalf of its clients. Areas where video surveillance is being carried out will be demarcated with signage. Your data which may include images of you and the vehicle you arrived in is collected and recorded on a digital recording device located in its offices. Data will be stored in a locked area for a period of 30 days after which it will be overwritten. If a crime or incident has occurred, the data will kept for longer than 30 days and data may be shared with the Police.
Sharing of personal information

It may be necessary to share your personal data with third parties to perform our contract with you. For instance it would be necessary for us to share your data with laboratories in the analysis of samples from your animals for diagnostic or disease screening purposes, such information is treated as confidential and remains as such unless there is a legal requirement to release this information to regulatory authorities as is the requirement for notifiable diseases regulated by law. Details may also be released to debt recovery agencies which would be a legitimate purpose for our business. We may also share the information with government or other public authorities such as HMRC and law enforcement as required by law.

Your rights as a data subject

At any point whilst ERS(UK) is in possession of or processing your personal data, all data subjects, have the following rights:

- **Right of access:** you have the right to request a copy of the information that we hold about you.
- **Right of rectification:** you have a right to ask us to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten:** in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing:** where certain conditions apply you have a right to ask us restrict the processing.
- **Right to portability:** you have the right to have the data we hold about you transferred to another organisation.
- **Right to object:** you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling:** you also have the right not to be subject to a decision based solely on automated processing or profiling.

We honour your rights in relation to your personal data and will respond to all requests we receive from you relating to your personal data. ERS(UK) can, at your request, confirm what information it holds about you and how it is processed. If, after carefully considering any request that you might make in respect of the above rights, we refuse your request we will provide you with a reason as to why. You have a right to challenge our decision to refuse your request and can do so by making a complaint (see below).

Complaints

We take complaints very seriously. In the event that you wish to make a complaint about how your personal data is being processed by ERS (UK), you have the right to complain to ERS (UK)s Data Protection Officer. If you do not receive a response within 30 days or should we fail to provide you with details of the data requested you have the right to refer your complaint to the Information Commissioner via their website (www.ico.org.uk).

Our contact details

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