

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. 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 basis 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. 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 as insurance companies, debt collection agencies, microchip registration companies, the production

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 ~~is~~ *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~~ *consent* you have provided.

If we are processing your data in ~~relatio~~ *relation* to the research activities of the RVC then the legal bases will either be ~~consent~~ *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~~ *basis* for sharing we will do so on the ~~bases of~~ *legal obligation*.

If we have robust grounds for ~~suspecting~~ *suspecting* animal cruelty ~~or~~ *abuse* then we will share your personal data with the relevant ~~bodies~~ *bodies* (e.g. The ~~police~~, the local authority inspector ~~or~~ the RSCPA) on the

blood tests, vaccinations, post mortems, pet passports or our microchipping services 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 seek permission to disclose your personal data to 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

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

Safety and Security

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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 outlined above