

PRIVACY POLICY

Wilson’s Veterinary Behaviour Referrals Limited

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1. Introduction

Wilson’s Veterinary Behaviour Referrals Limited ("we", "us", "our") operates as a veterinary behaviour centre providing behavioural consultations, assessments, training programmes, and related veterinary services for companion animals. We are committed to protecting the privacy and personal data of our clients, their families, and any individuals who interact with our practice.

This Privacy Policy explains how we collect, use, store, share, and protect your personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and any other applicable data protection legislation.

2. Data Controller

The data controller responsible for your personal data is:

Beverley Wilson

Wilson’s Veterinary Behaviour Referrals Limited

Unit 6 Exmoor Avenue, Scunthorpe, North Lincolnshire, DN15 8NJ

Email: beverley.wilson@wilsonsveterinary.co.uk

Telephone: 01724 808089

3. What Personal Data We Collect

We may collect and process the following categories of personal data:

3.1 Client Information

- Full name, address, telephone number, and email address
- Emergency contact details
- Payment and billing information (card details are processed by our secure payment provider and are not stored by us)
- Communication preferences

3.2 Animal Information

- Animal name, species, breed, age, sex, and microchip number

- Detailed behavioural history and incident reports
- Veterinary clinical records, vaccination history, and medication details
- Behavioural assessment results, treatment plans, and progress notes
- Photographs and video recordings taken during consultations (with your consent)
- Referral information provided by your primary veterinary surgeon

3.3 Special Category Data

In certain circumstances, behavioural consultations may involve discussion of an owner’s health conditions where relevant to the animal’s behaviour or the safety plan (for example, mobility limitations affecting management recommendations). Such data is processed only with your explicit consent and only to the extent necessary for safe and effective treatment planning.

3.4 Website and Digital Data

- IP address, browser type, and device information
- Cookies and website usage analytics
- Online booking form submissions
- Enquiry form and email correspondence

4. How We Use Your Personal Data

We process your personal data for the following purposes:

Purpose	Lawful Basis
Provision of veterinary behavioural services	Performance of a contract / Legitimate interests
Creating and maintaining clinical and behavioural records	Legal obligation (Veterinary Surgeons Act 1966) / Legitimate interests
Communicating with you about appointments, treatment plans, and follow-up care	Performance of a contract
Processing payments and invoicing	Performance of a contract
Communicating with your referring veterinary surgeon	Legitimate interests / Consent
Complying with legal and regulatory obligations (e.g., Dangerous Dogs Act reporting, RCVS requirements)	Legal obligation
Improving our services through anonymised case reviews and clinical audits	Legitimate interests
Sending practice updates, educational materials, or newsletters (only with your consent)	Consent
CCTV monitoring of practice premises for safety and security	Legitimate interests

5. Who We Share Your Data With

We may share your personal data with the following parties where necessary:

- Your referring veterinary surgeon or other veterinary professionals involved in your animal’s care
- Behaviour professionals involved in your animal’s care

- Veterinary specialists to whom we may refer your case
- Diagnostic laboratories
- Our professional indemnity insurers (in the event of a complaint or claim)
- The Royal College of Veterinary Surgeons (RCVS) where required by regulatory obligation
- Law enforcement or local authorities where there is a legal duty to report (e.g., under the Dangerous Dogs Act 1991)
- Our IT service providers and practice management software providers who process data on our behalf under written data processing agreements
- Our accountants and payment processors for billing purposes

We will never sell your personal data to third parties. We will not share your data for marketing purposes without your explicit consent.

6. Data Retention

We retain personal data for the following periods:

Data Type	Retention Period
Clinical and behavioural records	7 years from the date of the last consultation (in line with RCVS and professional indemnity guidance)
Financial and billing records	7 years (in accordance with HMRC requirements)
General correspondence	3 years from the date of last contact
CCTV footage	30 days (unless required for an ongoing investigation)
Marketing consent records	Duration of consent plus 1 year after withdrawal
Website analytics data	26 months (anonymised)

7. Data Security

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure, or destruction. These measures include:

- Encrypted storage of electronic records
- Password-protected systems with role-based access controls
- Secure physical storage for paper records (locked filing cabinets in restricted areas)
- Regular staff training on data protection and confidentiality obligations
- Data processing agreements with all third-party service providers
- Regular review and testing of security measures

8. Your Rights Under Data Protection Law

Under UK GDPR, you have the following rights in relation to your personal data:

- Right of access – You may request a copy of the personal data we hold about you (a Subject Access Request).
- Right to rectification – You may request correction of inaccurate or incomplete data.
- Right to erasure – You may request deletion of your data in certain circumstances (note: clinical records may need to be retained for regulatory or insurance purposes).

- Right to restrict processing – You may request that we limit how we use your data.
- Right to data portability – You may request your data in a structured, commonly used, machine-readable format.
- Right to object – You may object to processing based on legitimate interests or direct marketing.
- Right to withdraw consent – Where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of prior processing.

To exercise any of these rights, please contact us using the details in Section 2 above. We will respond to your request within one calendar month.

9. Photographs, Video Recordings, and Case Studies

We may record consultations via video or take photographs of your animal for the following purposes:

- Clinical assessment and treatment planning
- Monitoring behavioural progress over time
- Internal training and continuing professional development

We will always obtain your explicit consent before using any photographs, video recordings, or case details for educational presentations, publications, social media, or marketing materials. All identifying information will be removed unless you provide written permission otherwise.

10. Children’s Data

Where a client is under the age of 18, we will obtain consent from a parent or legal guardian before collecting and processing their personal data. Behavioural consultations involving minors in the household (for example, where a behaviour modification plan involves interactions between children and animals) will be handled with particular care, and data will be limited to what is strictly necessary for safe treatment planning.

11. International Data Transfers

We do not routinely transfer personal data outside the United Kingdom. In the event that an international transfer is necessary (for example, when using cloud-based software with servers outside the UK), we will ensure that appropriate safeguards are in place, such as Standard Contractual Clauses approved by the Information Commissioner’s Office (ICO) or an adequacy decision.

12. Cookies

Our website may use cookies to improve your browsing experience. Cookies are small text files placed on your device. We use the following types of cookies:

- Essential cookies – Required for the website to function (e.g., session management, online booking).
- Analytics cookies – Help us understand how visitors use our website (e.g., Google Analytics). These are anonymised.
- Marketing cookies – Used only with your consent to deliver relevant content.

You can manage your cookie preferences through your browser settings. Disabling certain cookies may affect website functionality.

13. Complaints

If you are unhappy with how we handle your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO):

Information Commissioner’s Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.org.uk

We encourage you to contact us first so that we can try to resolve your concern directly.

14. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in legislation, our services, or our data processing activities. The most current version will always be available at our practice and on our website. We will notify you of any material changes.

15. Contact Us

If you have any questions about this Privacy Policy or how we process your personal data, please contact:

Beverley Wilson

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