

Policy	Privacy Notice – Medivet Employees, Former Employees, Workers and Contractors		
Associated Policies and Documents	Data Protection Policy		
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Version No. Changed	Revision Date	Brief Summary of Changes
1	February 2021	Created for initial review and publication
2	June 2023	Document updated to include process changes and terminology throughout.

Authorisation	Signed
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What is the purpose of this privacy notice?

At Medivet Group Limited ("**Medivet**", "**we**", "**us**", "**our**") we recognise that it is important for you to understand how we use your personal data. Therefore, please read the following information carefully as it contains important information regarding how we use your personal data.

We will only use personal data in ways that are described in this notice and only ways that are consistent with our obligations and your rights under applicable data protection laws.

For the purpose of applicable data protection laws, the data controller (in other words, the organisation that determines how and for what purposes your personal data is used) will be Medivet Group Limited. This is true for all subsidiaries of Medivet Group Limited, veterinary practices operating under the 'Medivet' brand name and other veterinary practices operated by Medivet and trading under a different name.

Data Protection Principles

Medivet will comply with the data protection principles which say that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information Medivet may hold about you

In connection with your employment with us we may collect, store, and use personal information about you. We typically collect personal information about employees, workers and contactors through the application and recruitment process, either directly from candidates or from third parties including former employers, credit reference agencies, other background check agencies, recruitment agencies and some social media platforms such as LinkedIn.

Personal data you provide to us directly.

Ways in which you might provide the data to us

Once you start your work or employment with us, you will be required to complete standard forms containing personal information (such as marital status or bank account) to enable us to process you as our employee, worker or contractor. We may also collect personal information in the course of job-related activities throughout the period you work for us.

What type of data might be included?

We may collect, store, and use the following categories of personal information about you:

- Personal details such as name, title, date of birth, gender, marital status, dependants, next of kin, emergency contact information, national insurance number, bank account details, payroll records, copy of photographic identification and benefits information.
- Contact details such as addresses, telephone numbers, and personal email addresses.
- Employment details such as salary, annual leave, pension, benefits information, start date, location of employment or workplace.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Employment records (including job titles, work history, working hours, training records, professional memberships, performance information and disciplinary and grievance information)
- Photographs including for publicity or promotional purposes, CCTV footage and other information obtained through electronic means such as swipecards.
- Information about your use of our information and communications systems including monitoring and listening to telephone calls, reviewing internal files or systems to track work completion and reviewing documents you have created.
- Log of internet history.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation, but only if and to the extent you wish to share this information with us. We will only ask you to provide these details to ensure that we meet our legal obligations, for example, with respect to our equal opportunities policy.
- Trade union membership.
- Information about your health, including any medical condition, disability, health and sickness records.
- Information about criminal convictions and offences or disciplinary actions, but only if and to the extent that the role you fulfil involves certain fiduciary duties or that we are required to do so in accordance with applicable laws.

Why and how does Medivet use your personal data and what is our lawful basis?

We will only use your personal information when the law allows us to. Whenever we process your personal data, we are required to identify and maintain a valid "lawful basis" (i.e. a legally compliant justification) for the processing. To help you to understand what we do with data and why, we have described the various relevant lawful bases that we rely on in the table below. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.

How and why we use your personal data	What is our legal justification for processing your personal data
Paying you and making decisions about salary reviews and compensation. Providing contractual benefits to you. Liaising with your pension provider. Administering the contract we have entered into with you. Ascertaining your fitness to work. Managing sickness absence. Gathering evidence for possible grievance or disciplinary hearings. Making decisions about your continued employment or engagement. Making arrangements for the termination of our working relationship. Conducting performance reviews, managing performance and determining performance requirements. Assessing qualifications for a particular job or task, including decisions about promotions.	We rely on our contractual arrangements with you as the lawful basis on which we collect and process your personal data in relation to your employment contract.
Checking you are legally entitled to work in the UK (if that status has changed since you start working with us). Complying with health and safety obligations. If you are an employee, deducting tax and National Insurance contributions.	We will use your personal data because it's necessary for us to comply with a legal obligation, such as relevant health and safety or tax-related laws.
Business management and planning, including accounting and auditing. Education, training and development requirements. Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work. To prevent fraud. To monitor your use of our information and communication systems to ensure compliance with our IT policies. To ensure network and information security, including preventing unauthorised access to	We rely on our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

How and why we use your personal data	What is our legal justification for processing your personal data
<p>our computer and electronic communications systems and preventing malicious software distribution.</p>	
<p>To conduct data analytics studies to review and better understand employee retention and attrition rates.</p>	
<p>Equal opportunities monitoring.</p>	
<p>We will use information relating to leaves of absence, which may include sickness absence or family related leaves to calculate correct sickness pay.</p>	<p>We will use your personal data to carry out our legal obligations or exercise rights in connection to your employment or engagement.</p>
<p>We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.</p>	<p>In some circumstances, we will use your personal data where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our data protection policy.</p>
<p>We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.</p>	<p>We may also need to process your personal data where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.</p> <p>In other cases we may need to process your personal data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.</p>
<p>To prevent or detect crime, fraud or abuses of our products and services or our Site and to enable third parties to carry out related technical, logistical, research or other functions on our behalf related to these purposes.</p>	<p>In some circumstances we will use your personal data because it's necessary for us to comply with a legal obligation (for example, if we receive a legitimate request from a law enforcement agency).</p> <p>In other cases (such as the detection of theft, fraud or ensuring security of our Site) we will rely on our legitimate interests in keeping our employees and our Site secure and to prevent theft and fraud.</p>
<p>To notify you about changes to our business, services and terms and conditions.</p>	<p>We rely on our contractual arrangements with you as the lawful basis for this processing. In some cases, we rely on our legitimate interests as a business to send you these updates.</p>

How and why we use your personal data	What is our legal justification for processing your personal data
<p>For administrative or business purposes, where you contact us for a particular reason other than those set out above, such as to report problems unrelated to your role.</p>	<p>We have a legitimate interest to respond to your contact for the purposes of administering our business.</p>
<p>We may use CCTV in our practices and Support Centre, for the safety of and prevention of any crimes committed against our staff, our clients, our patients, our suppliers and other visitors, our equipment and our properties, not for other monitoring purposes. If we do so there will always be a notice board to let you know what we're doing.</p>	<p>We have a legitimate interest to ensure the safety of and prevention of any crimes committed against our staff, our clients, our patients, our suppliers and other visitors, our equipment and our properties.</p> <p>In some circumstances we will use your personal data because it's necessary for us to comply with a legal obligation (for example, in the event of any criminal investigations, we may be required by law, to share the data captured with the relevant authorities.).</p>
<p>We sometimes run events, fairs, or even host school visits in our practices. This may entail the production of photographic, video or audio material.</p>	<p>If this media contains images of you, we will only make use of it if we have obtained and recorded your consent.</p> <p>We will also let you know what we do with this information (for example, place it on the practice's website or social media page). You can always contact us and ask for the removal of any such media featuring you.</p>

What if you fail to provide personal information?

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our employees/workers).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Your privacy controls

It's really important to us that you are comfortable with the way that we are using your data and you can tell us any time if you'd like to change the way that things are working.

If you wish to discuss our data protection practices, please contact us (using the contact details set out below).

Sharing your data

We may have to share your data with third parties, including third-party service providers and other entities in the group. We require third parties to respect the security of your data and to treat it in accordance with the law.

Sharing your information with third parties and other group entities

We will share your personal information with third parties where required by law (such as HMRC), where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group. Activities carried out by third-party service providers include: HR and payroll system databases, pension administration, benefits provision and administration, IT services, provision of insurance services such as private healthcare and car insurance.

All our third-party service providers and other entities in the group are required to put in place appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We will share your personal information with entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

How do we protect your personal information?

We take the security of your personal information very seriously and have put in place physical, technical, operational and administrative strategies, controls and measures to help protect your personal information from unauthorised access, use or disclosure as required by law and in accordance with accepted good industry practice. We will always keep these under review to make sure that the measures we have implemented remain appropriate. You can obtain further information about these measures from us (using the contact details set below).

In addition, we limit access to your personal information to those employees, partners, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

How long do we keep your personal information?

We will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, tax, health and safety, reporting or accounting requirements. This means your personal data will be erased from our systems when we no longer need it.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you. In this case, we may retain such information for a longer period without further notice to you. In addition, we may be required to retain your personal information for longer periods of time to the extent we are required to do so by law or to protect our legitimate interests (for example, if we are involved in legal or administrative proceedings).

Retention Periods:

- For employees, workers and contractors – 7 years after termination of employment/engagement.
- CCTV – subject to our CCTV Policy.
- Visitor logs (where applicable) – 6 months from completion of each visitor book.

Your rights in connection with your personal information

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes so that our records can be updated. We cannot be held responsible for any errors in your personal information in this regard unless you have notified us of the relevant change.

Data protection law grants you a number of specific rights in respect of your data in addition to the broad and general right to have your data protected. We have set out some information in respect of each of those specific rights, below:

- **Right to be informed** about how your personal information will be processed. This enables you to receive information about how we use your personal information. We have set this information out in this notice.
- **Request access to your personal information** (commonly known as a "**subject access request**"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information (commonly known as the "**right to be forgotten**"). This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal information to another party.
- **Not to be subject to a decision solely based on automated processing.** We do not anticipate making decisions about you based solely on automated decision making where that decision would have a significant impact on you. If we ever make a decision about you automatically by a computer or an algorithm without human intervention you can ask us to have that decision reviewed by a human.

If you want to exercise any of the rights set out above, please contact us (using the contact details set out below).

Processing your personal information in other territories

Given the international location of some of our employees, clients and suppliers, your personal information may be transferred in and out of the UK and the European Economic Area ("EEA") where local laws may not provide legal protection for personal data in the same way as is applicable in the UK or the EEA. We may transfer personal data outside the UK or to an international organisation only on the basis that that country, territory or organisation is designated as having an adequate level of protection, has appropriate safeguards in place to ensure the protection of the data, or that one or more of the derogations recognised by Data Protection Laws for specific situations have been met.

If we feel that we can't ensure the adequate protection of your personal information we will not share your personal information until and unless you have provided us with your explicit consent to do so, after we explained to you the risk of consenting to such transfer of your personal data outside the UK, EEA or territories who are considered to have an adequate level of protection of personal data.

Changes to this privacy notice

We reserve the right to update or amend this privacy notice at any time, including where we intend to further process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. We will issue you with a new privacy notice as soon as practicable when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways from time to time.

Complaints

We encourage you to contact us first if you have any queries, comments or concerns about the way we handle your data (our details are in the section immediately below). We will try to put things right. Please contact our Group Data Protection Officer (see details below) and allow us to handle your request in the best possible way.

However, if you are not satisfied with our handling of any request by you in relation to your rights or concerns, you also have the right to make a complaint to the UK's Information Commissioner's Office ("ICO"). You can contact the ICO at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF; 0303 123 1113; or <https://ico.org.uk/>.

Contact

If you have any questions about this privacy notice or how we handle your personal information, you can contact us directly here or by emailing us at mydata@medivet.co.uk. Alternatively, you can contact via post at: Group Data Protection Officer, Medivet Support Centre, First Floor, The Hyde, 38 Clarendon Road, Watford, WD17 1HZ.