

# **Dermatology Referrals Privacy Notice**

**This is the Privacy notice that is required under the General Data Protection Regulation (GDPR)**

**This Notice is published in 5 Parts**

**Part 1 – General Provisions**

**Part 2 – Private Clients**

**Part 3 – Referring Veterinary Practices**

**Part 4 - Other Veterinary Colleagues**

**Part 5 – Suppliers**

**In each of parts 2- 5 there will be specific provisions for each category relating to:**

**What Information we hold on you**

**What information is being collected**

**Who is collecting it**

**How is it collected**

**How will it be used**

**Who will it be shared with**

**Where your information may be stored/processed**

**Any queries, requests or complaints about the personal information we hold on you, how it is obtained and how it is processed should, in the first instance be addressed to the Data Controller's data manager (see below).**

# Dermatology Referrals Privacy Notice (General Provisions)

## The Data Controller

The data controller is Dermatology Referrals a business wholly owned and operated by Dr Anita Patel BVM DVD MRCVS an RCVS recognised specialist in veterinary dermatology (referred to as the practice, or Dr Patel, or us, our etc. in this document |).

Dermatology Referrals address is: 23 Searchwood Road, Warlingham, Surrey CR6 9BB

The data manager is Mr Jon Radford;

Tel +44 1883 623761;

e-mail [jon@dermatologyreferrals.co.uk](mailto:jon@dermatologyreferrals.co.uk)

## The purposes for which the information will be processed

The information is being processed for the purposes of the efficient administration of Dr Patel's veterinary dermatology practice which includes:

- Assessing and treating patients in the UK
- Administering Dr Patel's practice
- Advising veterinary colleagues in the UK and abroad, both within and without the EU
- Lecturing in the UK and abroad, both within and without the EU
- Writing books, articles and papers etc. for publication in the UK and abroad, both within and without the EU
- Research into diseases in the UK and abroad, both within and without the EU
- Direct marketing, with explicit consent only.

## Fair Processing

Dermatology referrals is a referral practice, that is you become our client by asking, or agreeing with, you vet to have you pet referred to us for assessment and treatment. When you, or your vet, contact us, either directly or through one of the clinics where Dr Patel sees clients, you are providing us with implicit consent to obtain, hold and process your personal information for the purposes laid out in the preceding paragraph.

When considering what information to process for a particular purpose, it will not always be necessary to use, or collect, the whole set of personal data. For instance:

- When discussing a particular case with a colleague, before a patient is referred to us, it is usually only necessary to ask for the pet and owners name (for subsequent identification of the case), as well as other pertinent details of the pet and its history, rather than the whole data set we collect for referred clients.
- When presenting or publishing a report on a case it is not usually necessary to include the patient's name, or the client's details, except a general indication of residence e.g. Surrey, or CR6.

When it is not necessary to collect all the information on a client, then we will only collect and process that which we need to carry out the task in hand.

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When processing requires explicit consent then we will endeavour to obtain the client's permission, whenever possible, in advance.

You may ask for all, or some, of your data to be altered (if our records are inaccurate), or deleted by contacting the data manager. The data manager may refuse to do so, in whole or in part, if by doing so conflicts with our retention of data policy (see paragraph below).

You may also require us to cease processing your information; however, if you do so, or if you ask us to change, or delete the information we hold on you, then we may no longer be able to consider you as a client.

## Retention of Data

Clients Personal Data will be retained for as long as:

- Their pet(s) remain patients of the practice
- The client owes the practice money
- The client is in dispute with the practice; and
- As required by law and regulatory bodies (e.g. HMRC requires accounting records, including invoices, to be kept for 6 years; and the RCVS requires a patient's clinical records to be kept for 7 years)
- The data on their pets disease(s) and/or treatment forms part of a study (published or unpublished) by Dr Patel

## Legal Basis and Consent

The personal information we collect and hold on you is for the efficient and effective carrying on of our business as a veterinary referral practice. **We do not market our services directly to clients.**

As such the legal basis of our collecting and processing clients' personal information is that of our legitimate interests and legal obligations; and, as such does not need specific consent from you.

If consent is needed for a specific purpose, e.g. inclusion in a clinical trial, you will be asked for that consent and the information to be collected and processed and reasons for doing so will be explained to you. If you choose not to give your consent then that will not impact on the professional services provided to you and your pet(s) by the practice.

## Your Rights

Nothing in this policy affects your rights under the laws concerning data privacy in the UK.

Specifically you have the following rights under the GDPR code:

- You have the right to receive the information you have provided to us in a structured, commonly used and machine readable format
- You have the right to request from us access to and rectification or erasure of personal information, or the restriction of processing concerning your information (but see the section on the retention of data, above, for exceptions)
- Where you have given explicit consent, you have the right to withdraw it at any time
- You have the right to lodge a complaint with the regulator (see below).

# **Dermatology Referrals Privacy Notice (General Provisions)**

## **Complaints Process**

If you have a complaint about the way your personal data has been collected, processed or stored, in the first instance please contact the data manager, Jon Radford on 01883 623761, or, preferably by e-mail at [jon@dermatologyreferrals.co.uk](mailto:jon@dermatologyreferrals.co.uk). E-mail is preferable as it gives an auditable account of your complaint and wishes and our response.

If you are not content with our proposals/actions to settle your complaint, you may contact the Office of the Information Commissioner at:

**The Information Commissioner's Office,  
Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire SK9 5AF**

By telephoning: **0303 123 1113**

By emailing: **casework@ico.org.uk**

By using their website: **<https://ico.org.uk/for-organisations/report-a-breach/>**

## **Policy Changes**

This policy will be changed if we are required to by changes in the regulations, or law, governing data protection. We may also make changes to bring it in line with changes in the way the business is administered, or our commercial objectives change.

Any changes affecting those aspects of the policy that require people, or organisations, to opt-in will be notified to those people and organisations, before being implemented.

## **Scope of this Policy**

This policy applies to all practice personnel and all clients of the practice.

A person, or organisation, is a client of the practice if:

1. They have been referred to us and we have consented to have their pets as patients.
2. As a bona-fide veterinary practice, or veterinary surgeon, they are requesting our opinion, or advice, about a patient they are treating.

It also applies to all suppliers of goods and services to the practice.

# **Dermatology Referrals Privacy Notice (Personal Clients)**

## **Personal Clients - What information is being collected?**

1. Personal details on you
  - a. Your full name (and nickname(s))
  - b. Your address(es)
  - c. Your telephone number(s)
  - d. Your e-mail address(es)
  - e. Your social media contact details
  - f. Photograph(s) for our practice management system
  - g. Credit card details - for processing payments only, we do not keep these details on our database(s)
  - h. Debtor status
2. Personal details on your spouse/partner/carer. As above if we think it is in your pet's interest that we should have an alternative point of contact.
3. Patient Data (for information only)
  - a. Your pet's name
  - b. Age
  - c. Neutering status
  - d. Species and breed
  - e. Colour
  - f. Registration date
  - g. Passport number
  - h. Insurance status and policy number(s)
  - i. Microchip details
  - j. Referring vet and veterinary practice
  - k. Clinical records from the referring vet
  - l. Clinical records generated in house
  - m. Clinical records from 3<sup>rd</sup> parties (e.g. Laboratory test results)
  - n. Date of death (when known)
  - o. Photographs of your pet

## **Who collects the information?**

We collect information about you directly, or it is provided to us by 3<sup>rd</sup> parties; in particular, by referring veterinary practices and the clinics where consultations take place.

## **Where we get this information from:**

1. From you, or your representatives, either in person or over the phone, by text, e-mail etc.
2. From the practice that refers your pet to Dr Patel
3. From your insurance company
4. From publically available data (e.g. the Post Office's post code/address web site)

# **Dermatology Referrals Privacy Notice (Personal Clients)**

## **Why we collect this information (Purpose).**

1. To enable us to carry out our function as consulting veterinary surgeons by – for example:
  - a. To aid in the assessment, diagnosis and treatment of your pet's condition(s)
  - b. To aid in the prescription and dispensing of appropriate medication(s) for your pet.
  - c. To refer you on to other specialists, if your pet's condition warrants it and you agree to it
  - d. Otherwise to help in the administration of the practice in the normal course of business
2. To keep your referring practice (or any other veterinary practice you take your pet to) informed of any and all pertinent information about your pet's health, illness(es) and proposed treatments.
3. To complete veterinary insurance forms, at your request.
4. To contact you:
  - a. To arrange consultations
  - b. To inform you laboratory results and consequential treatment,
  - c. To discuss ongoing medication, check-ups and other aspects of your pet's care with you
  - d. To remind you to re-order your pet's medication
  - e. To take payment for services rendered and medicines and goods supplied by us
5. To comply with the law (e.g. recording the dispensing of POM-V medicines) and the Royal College of Veterinary Surgeons code of conduct.

## **How we will contact you:**

1. By telephoning you
2. By Text message
3. By e-mail
4. By social media (provided it is appropriate and private)
5. By post
6. By contacting your spouse/partner/carer in the event that we are unable to contact you directly.
7. By passing messages through the veterinary practice your pet is registered with

## **Who we may share information with:**

1. The veterinary clinic that referred you to us
2. Any other veterinary clinic that you have registered your pet with
3. Any other veterinary clinic, person or organisation that you ask us to contact
4. Your Pet's insurance company
5. The clinic(s) out of which Dr Patel practices
6. Regulatory bodies (e.g. the VMD if we are supplying you with immunotherapy)
7. Debt recovery services in the event that you do not pay your bill in a timely manner
8. Our legal advisors, in the event that you make a complaint about us, or undertake, or threaten to undertake, an action against us.

## **Dermatology Referrals Privacy Notice (Personal Clients)**

9. Our insurers, in the event that you make a complaint about us, or make, or threaten to make, a claim against us
10. With duly constituted legal and government bodies/agencies who are entitled to ask for/be informed of certain information (e.g. notifiable diseases)
11. The police and animal welfare societies in the event that we suspect your pet has been involved in illegal activities (e.g. dog fighting) or that you are/have been grossly mistreating your pet, if we have reasonable suspicions that you have broken the law.
12. If all part of the business is sold, then your data will be transferred to the purchaser.

### **What other ways may we use this information:**

1. As data in clinical trials (with your informed consent)
2. As anonymised data for reports and papers in veterinary publications, seminars and lectures etc.
3. Any other purpose you give us explicit permission for.

### **Where your information may be stored/processed:**

1. On the practice management database(s)
2. On other databases on the practices computer system e.g.
  - a. On outlook databases
  - b. On mobile phones & tablets
  - c. On back-ups.
  - d. In the practice's cloud based databases (e.g. Dropbox)

# **Dermatology Referrals Privacy Notice (Referring Veterinary Practices)**

## **Referring Veterinary Practices - What information is being collected?**

The information includes

- The clinics name, address and contact details including e-mail addresses and web site addresses and registered/head office.
- The name and qualifications of the referring vet and other vets at the clinic who may have occasion to treat the patient
- The names and qualifications of the veterinary nursing staff and the auxiliary staff
- **Personal details of clients you refer to us, or on whose behalf you are asking for advice (e.g. on clinical notes).**

## **Who is collecting it?**

- We are

## **How is it collected?**

- From yourselves (e.g. over the phone or on patients' clinical notes you send us)
- From your website(s) and social media posts
- From publicly available sources (e.g. The Post Offices' find a postcode website)
- From commercial sources

## **Why is it being collected?**

The information collected is for

- The efficient administration of the patient referral, treatment and follow-up.
- Invoicing and debt collection
- Direct marketing of the practices services to referring and potentially referring vets and veterinary practices (needs opt-in)

N.B. We do not sell your details to other persons or businesses

## **How will it be used?**

The information will be used for

- To follow-up on cases when you have sought our advice on
- Our administration
- Direct marketing
- Debt collection
- To fulfil our legal obligations

# **Dermatology Referrals Privacy Notice (Referring Veterinary Practices)**

## **Who will it be shared with?**

It may be shared with:

- The clinic(s) where the consultation with the client takes place, if one takes place.
- Other clinics to whom the client and patient is referred (e.g. other specialists)
- Other clinics where the client and pet are registered
- The client's pet insurance company and/or their agents
- Direct marketing businesses acting on our behalf
- Debt collection agencies
- Other entities that have a legal right to require us to disclose the information to them.

## **Where your information may be stored/processed:**

1. On the practice management database(s)
2. On other databases on the practices computer system e.g.
  - a. On outlook databases
  - b. On mobile phones & tablets
  - c. On back-ups.
  - d. In the practice's cloud based databases (e.g. Dropbox)

# **Dermatology Referrals Privacy Notice (Veterinary Colleagues)**

## **Veterinary Colleagues - What information is being collected?**

The information may include

- Your name and qualifications as the referring vet and other vets at the clinic who may have occasion to treat the patient
- The name, address and contact details including e-mail addresses and web site addresses and registered/head office, of the clinic where the patient is registered.
- **Personal details of clients you refer to us, or on whose behalf you are asking for advice (e.g. on clinical notes).**

## **Who is collecting it?**

- We are

## **How is it collected?**

- From yourselves (e.g. over the phone or on patients' clinical notes you send us)
- From your website(s) and social media posts
- From publicly available sources (e.g. The Post Offices' find a postcode website)
- From commercial sources

## **Why is it being collected?**

The information collected is for

- The efficient administration of the patient referral, treatment and follow-up.
- Invoicing and debt collection
- Direct marketing of the practices services to referring and potentially referring vets and veterinary practices (needs opt-in)

N.B. We do not sell your details to other persons or businesses

## **How will it be used?**

The information will be used for

- To follow-up on cases when you have sought our advice on
- Our administration
- Direct marketing
- Debt collection
- To fulfil our legal obligations

# **Dermatology Referrals Privacy Notice (Veterinary Colleagues)**

## **Who will it be shared with?**

It may be shared with:

- The clinic(s) where the consultation with the client takes place, if one takes place.
- Other clinics to whom the client and patient is referred (e.g. other specialists)
- Other clinics where the client and pet are registered
- The client's pet insurance company and/or their agents
- Direct marketing businesses acting on our behalf
- Debt collection agencies
- Other entities that have a legal right to require us to disclose the information to them.

## **Where your information may be stored/processed:**

3. On the practice management database(s)
4. On other databases on the practices computer system e.g.
  - a. On outlook databases
  - b. On mobile phones & tablets
  - c. On back-ups.
  - d. In the practice's cloud based databases (e.g. Dropbox)

# **Dermatology Referrals Privacy Notice (Suppliers)**

## **Suppliers - What Information we hold on you**

### **What information is being collected?**

- The name and contact details, including web site addresses, of you the supplier
- The names, positions and qualifications of the individuals we have reason to deal with in your organisation
- Details of licences, authorisations and trade associations that you need, or which you are affiliated to in order to carry out your business.

### **Who is collecting it?**

- We are

### **How is it collected?**

- From information you supply us
- From public sources (e.g. your website and trade associations/directories)
- From word of mouth (e.g. from other customers' of yours)

The information collected is for

- The efficient administration of the patient referral, treatment and follow-up.
- Invoicing and debt collection
- Direct marketing of the practices services to referring and potentially referring vets and veterinary practices (needs opt-in)

N.B. We do not sell your details to other persons or businesses

### **How will it be used?**

The information will be used for

- Our administration
- Direct marketing (if applicable)
- Debt collection
- To fulfil our legal obligations

## **Dermatology Referrals Privacy Notice (Suppliers)**

### **Who will it be shared with?**

It may be shared with:

- Other veterinary practices seeking references about you
- Direct marketing businesses acting on our behalf
- Debt collection agencies
- Our insurers
- Other entities that have a legal right to require us to disclose the information to them.

### **Where your information may be stored/processed:**

5. On the practice management database(s)
6. On other databases on the practices computer system e.g.
  - a. On outlook databases
  - b. On mobile phones & tablets
  - c. On back-ups.
  - d. In the practice's cloud based databases (e.g. Dropbox)