
GDPR DATA PROTECTION POLICY



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1. Introduction

Pet Emergency Treatment Services Limited (Pets Ltd) is committed to conducting its business in accordance with all applicable Data Protection laws and regulations, and in line with the highest standards of ethical conduct.

This policy sets forth the expected behaviours of Pets Ltd employees, and third parties in relation to the collection, use, retention, transfer, disclosure and destruction of any personal data belonging to a Pets Ltd contact (i.e. the data subject).

Personal data is any information (including opinions and intentions) which relates to an identified or identifiable person. Personal data is subject to certain legal safeguards and other regulations, which impose restrictions on how organisations may process personal data. An organisation that handles personal data and makes decisions about its use is known as a data controller. Pets Ltd, as a data controller, is responsible for ensuring compliance with the Data Protection requirements outlined in this policy. Non-compliance may expose Pets Ltd to complaints, regulatory action, fines and or reputational damage.

Pets Ltd.'s leadership is fully committed to ensuring continued and effective implementation of this policy and expects all Pets Ltd employees and third parties to share in this commitment. Any breach of this policy will be taken seriously and may result in disciplinary action or business sanction.



2. Scope

This policy applies to all Pets Ltd entities where a data subject's personal data is processed.

This policy applies to all processing of personal data in electronic form (including electronic mail and documents created with word processing software) or where it is held in manual files that are structured in a way that allows ready access to information about individuals.

3. Definitions

Employee	An individual who works part-time or full-time for Pets Ltd under a contract of employment, whether oral or written, express implied, and has recognised rights and duties. Includes temporary employees and independent contractors.
Third Party	An external organisation with which Pets Ltd conducts business and is also authorised to, under the direct authority of Pets Ltd, Process the personal data of Pets Ltd contacts.
Personal Data	Any information (including opinions and intentions) which relates to an identifiable or identified person.
Contact	Any past, current or perspective Pets Ltd customer.
Identifiable Person	Anyone who can be identified, directly or indirectly in particular by reference to an identifier such as a name an identification number, location data, an online identifier, or one to more factors specified to the physical, phycological, generic, mental, economic, cultural or social identity of that person.
Contact	Any past, current or prospective Pets Ltd customer.
Data Controller	A natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Pets Ltd Entity	A Pets Ltd establishment, including subsidiaries and joint ventures over which Pets Ltd may exercise management control.
Data Subject	The identified or identifiable person to which the data refers.
Process, Processed, Processing	Any operation or set of operations performed on personal data or on sets of personal data, whether by automated means. Operations performed may include collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, disseminations or otherwise making available, alignment or combination, restriction, erasure or destruction.
Data Protection	The process of safeguarding personal data from unauthorised or unlawful disclosure, access, alteration, processing, transfer or destruction.
Data Protection Authority	An independent public authority responsible for monitoring the application of the relevant data protection regulation set forth in national law.
Data Processors	A natural or legal person, public authority, agency or other body which processes personal data on behalf of a data controller.
Consent	Any freely given, specific, informed and unambiguous indication of the data subjects wishes by which he or she by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
Special Categories of Data	Personal data permitted to or revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; data concerning health or sex life and sexual orientation; genetic data or biometric data.
Profiling	Any form of automated processing of personal data where personal data is used to evaluate specific or general characteristics relating to an identifiable natural person. In particular to analyse or predict certain



	aspects concerning that natural person's performance at work, economic situations, health personal preferences, interests, reliability, behaviour, location or movement.
Personal Data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.
Encryption	The process of concerting information or data into code, to prevent unauthorised access.
Pseudonymisation	Data amended in such a way that no individuals can be identified from the data (whether directly or indirectly) without a "key" that allows the data to be re-identified.
Anonymisation	Data amended in such a way that no individuals can be identified from the data (whether directly or indirectly) by any means or by any person.

4. The Policy

4.1 Governance

4.1.1 Data Protection Management

To demonstrate our commitment to data protection, and to enhance the effectiveness of our compliance efforts, the management team will be collectively responsible for the management and implementation of data protection within the company. The management team will report to the chief risk officer/central data controller who has direct access to the board of directors. It is the chief controllers/central data controllers role to carry out the following duties:

- Inform and advise Pets Ltd and its employees who carry out processing pursuant to data protection regulations, national law or union-based data protection provisions.
- Ensuring the alignment of this policy with data protection regulations, national law or union based data protection provisions;
- Providing guidance with regards to carrying out data protection impact assessments;
- Acting as a point of contact for and cooperating with data protection authorities;
- Determining the need for notifications to one or more data protection assessments as a result of Pets Ltd.'s current or intended personal data processing activities;
- Making and keeping current notifications to one or more data protection assessments as a result of Pets Ltd.'s current or intended personal data processing activities;
- The establishment and operation of a system providing prompt and appropriate responses to data subject requests.
- Informing senior managers, officers, and directors or Pets Ltd.'s of any potential corporate, civil and criminal penalties which may be levied against Pets Ltd and/or its employees for violation of applicable data protection laws.
- Ensuring establishment of procedures and standard contractual provisions for obtaining compliance with this policy by any third party who:
 - Provides personal data to a Pets Ltd entity
 - Receives Personal data from a Pets Ltd entity
 - Has access to personal data collected or processed by a Pets Ltd entity.

4.1.2 Policy Dissemination and Enforcement

The management team of each Pets Ltd entity must ensure that all Pets Ltd employees responsible for the processing of personal data are aware of and comply with the contents of this policy.

In addition, each Pets Ltd entity will make sure all third parties engaged to process personal data on their behalf (i.e. their data processors) are aware of and comply with the contents of this policy. Assurance of such compliance must be obtained from all third parties, whether company or individuals, prior to granting them access to Personal data controlled by Pets Ltd.

4.1.3 Data Protection by Design

To ensure all data protection requirements are identified and addressed when designing new systems or processes and/or when reviewing or expanding existing systems or processes, each of them must go through an approval process before continuing.

Each Pets Ltd entity must ensure that a data protection impact assessment is conducted, in cooperation with the management team, for all new and/or revised systems or processes for which it has responsibility.

The subsequent findings of the DPIA must then be submitted to the Chief Risk Officer for review and approval. Where applicable, the IT department (or outsourced IT company) will cooperate with the management team to assess the impact of any new technology uses on the security of personal data.

4.1.4 Compliance Monitoring

To confirm that an adequate level of compliance that is being achieved by all Pets Ltd entities in relation to this policy, the management team will carry out an annual data protection compliance audit for all such entities. Each audit as a minimum will assess:

- Compliance with policy in relation to the protection to the protection of personal data, including:
 - The assignment of responsibilities
 - Raising awareness
 - Training of employees
 - The effectiveness of data protection related operational practice including:
 - Data subject rights
 - Personal data transfers
 - Personal data incident management
 - Personal data complaints handling
 - The level of understanding of data protection polices and privacy notices
 - The currency of data protection polices and privacy notices
 - The accuracy of personal data being stored
 - The conformity of data processor activities
 - The adequacy of procedures for redressing poor compliance and persona data breached

The management team, in cooperation with key business stakeholders from each Pets Ltd entity, will devise a plan with a schedule of correcting any identified deficiencies with a defied and reasonable time frame. Any major deficiencies identified will be reported to and monitored by the practice manager and the directors of Pets Ltd.

4.2 Data Protection Principles

Pets Ltd had adopted the following principles to govern its collection, use, retention, transfer, disclosure and destruction of personal data.:

- Principle 1: Lawfulness, fairness and Transparency

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject. This means, Pets Ltd must tell the data subject what processing will occur (transparency), the processing must match the description given to the date subject (fairness), and it must be for one of the purposes specified in the applicable data proception regulation (lawfulness).

- Principle 2: Purpose Limitation

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. This means Pets Ltd must specify exactly what the personal data collected will be used for and limit the processing of that personal data to only with is necessary.

- Principle 3: Data Minimisation

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. This means Pets Ltd must not store any personal data beyond what is strictly required.

- Principle 4: Accuracy

Personal data shall be accurate and, kept up to date. This means Pets Ltd must have in place processes for identifying and addressing out-of-date, incorrect and redundant personal data.

- Principle 5: Storage Limitation

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. This means Pets Ltd must, wherever possible, store personal data in a way that limits or prevents identification of the data subject.

- Principle 6: Integrity and Confidentiality

Personal data shall be processed in a manner that ensures appropriate security if the personal data, including protection against unauthorised or unlawful processing, and against accidental loss, destruction or damage. Pets Ltd must use appropriate technical and organisational measure to ensure the integrity and confidentiality of personal data is maintained always.

- Principle 7: Accountability

The data controller shall be responsible for and be able to demonstrate compliance. This means Pets Ltd must demonstrate that the six data protection principles outlined above are met for all personal data for which it is responsible.

4.3 Data Collection

4.3.1 Data Sources

Personal data should be collected only from the data subject unless one of the following apply:

- The nature of the business purpose necessitates collection of the personal data from other persons or bodies.
- The collection must be carried out under emergency circumstances in order to protect the vital interests of the data subject or to prevent serious loss or injury to another person.

If personal data is collected from someone other than the data subject, the data subject must be informed of the collection unless one of the following apply:

- The data subject has received the required information by other means.
- The information must remain confidential due to a professional secrecy obligation
- A national law expressly provides for the collection, processing or transfer if the personal data.

Where it has been determined that notification to a data subject is required, notification should occur promptly, but in no case later than:

- One calendar month from the first collection or recording of the personal data
- At the time of first communication if used for communication with the data subject
- At the time of disclosure if disclosed to another recipient

4.3.2 Data Subject Consent

Each Pets Ltd entity will obtain personal data by lawful and fair means and, where appropriate with the knowledge and consent of the individual concerned, where a need exists to request and receive the content of an individual prior to the collection, use or disclosure of their personal data, Pets Ltd is committed to seeking such consent.

The management team in cooperation with any other relevant business representatives, shall establish a system for obtaining and documenting data subject consent for the collection, processing, and/or transfer of their personal data. The system must include provisions for:

- Determining what disclosures should be made in order to obtain valid consent.
- Ensuring the request for consent is presented in a manner which is clearly distinguishable from any other matters, is made in an intelligible and easily accessible form, and uses clear and plain language.
- Ensuring the consent is freely given (i.e. is not based on a contract that is conditional to the processing of personal data that is unnecessary for the performance of that contract).
- Documenting the date, method and content of the disclosures made, as well as the validity, scope and violation of the consents given.
- Providing a simple method for a data subject to withdraw their consent at any time.

4.3.3 Data Subject Notification

Each Pets Ltd entity will, when required by applicable law, contract, or where it considers that it is reasonably appropriate to do so, provide data subjects with information as to the purpose of the processing of their personal data.

When the data subject is asked to give consent to the processing of personal data and when any personal data is collected from the data subject, all appropriate disclosures will be made, in a manner that draws attention to them, unless one of the following apply:

- The data subject already has the information
- A legal exemption applies to the requirements for disclosure and/or consent

The disclosures may be given orally, electronically or in writing. If given orally, the person making the disclosures should use a suitable script or form approved in advance by the management team. The associated receipt or form should be retained, along with a record of the facts, date, content, and method of disclosure.

4.3.4 External Privacy Notices

Our website is provided by an external provider and it is our responsibility to ensure that an online privacy notice and cookie notice is included on the site, fulfilling the requirements of applicable law.

4.4 Data Use

4.4.1 Data Processing

Pets Ltd uses the personal data of its contacts for the following broad purposes:

- The general running and business administration of Pets Ltd entities.
- To provide services to Pets customers.
- The ongoing administration and management of customer services.

The use of a contact's information should always be considered from their perspective and whether the use will be within their expectations or if they are likely to object. For example, it would clearly be within a contact's expectations that their details will be used by Pets Ltd to respond to a contact request for more information about products and services we offer. However, it will not be within their reasonable expectations that Pets Ltd would then provide their details to third parties for marketing purposes.

Each Pets Ltd entity will process personal data in accordance with all applicable laws and applicable contractual obligations. More specifically, Pets Ltd will not process personal data unless at least one of the following requirements are met:

- The data subject has given consent to the processing of their personal data for one or more specific purposes.
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- Processing is necessary for compliance with a legal obligation to which the data controller is subject.
- Processing is necessary in order to protect the vital interests of the data subject or of another person.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise official authority vested in the data controller.
- Processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party (except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, in particular where the data subject is a child).

There are some circumstances in which personal data may be further processed for purposes that go beyond the original purpose for which the personal data was collected. When making a determination as to the compatibility of the new reason for processing, guidance and approval must be obtained from the management team before any such processing may commence.

In any circumstances where consent has not been gained for the specific processing in question, Pets Ltd will address the following additional conditions to determine the fairness and transparency of any processing beyond the original purpose for which the personal data was collected:

- Any link between the purpose for which the personal data was collected and the reasons for intended further processing.
- The context in which the personal data has been collected, in particular regarding the relationship between data subject and the data controller.
- The nature of the personal data, in particular whether special categories of data are being processed, or whether personal data related to criminal convictions or offenses are being processed. The possible consequences of the intended further processing for the data subject.
- The existence of appropriate safeguards pertaining to further processing which may include encryption, anonymisation or pseudonymisation.

4.4.2 Special Categories of Data

Pets Ltd will only process special categories of data (also known as sensitive data) where the data subject expressly consents to such processing or where one of the following conditions apply:

- The processing relates to personal data which has already been made public by the data subject.
- The processing is necessary for the establishment, exercise or defence of legal claims.
- The processing is specifically authorised or required by law.
- The processing is necessary to protect the vital interests of the data subject or of another person where the data subject is physically or legally incapable of giving consent.
- Further conditions, including limitations, based upon national law relating to the processing of generic data, biometric data or data concerning health.

In any situation where special categories of data are to be processed, prior approval must be obtained from the management team and the basis for processing clearly recorded with the personal data in question.

Where special categories of data are being processed, Pets Ltd will adopt additional protection measures. Each Pets Ltd entity may also adopt additional measures to address local custom or social expectation over the processing of special categories of data.

4.4.3 Children's Data

Children are unable to consent to the processing of personal data for information society services. Consent must be sought from the person who holds parental responsibility over the child, However, it should be noted that where processing is lawful under other grounds, consent need not be obtained from the child or the holder of parental responsibility.

Should any Pets Ltd entity foresee a business need for obtaining parental consent for information society services offered directly to a child, guidance and approval must be obtaining from the management team before any processing of a child's personal data may commence.

4.4.4 Data Quality

Each Pets Ltd entity will adopt all necessary measures to ensure that the personal data it collects, and processes is complete and accurate in the first instance and is updates to reflect the current situation of the data subject.

The measures adopted by Pets Ltd to ensure data quality include:

- Correcting personal data know to be incorrect, inaccurate, incomplete, ambiguous, misleading or outdated, even if the data subject does not request rectification.
- Keeping personal data only for the period necessary to satisfy the permitted uses or applicable statutory retention period.
- The removal of personal data is no longer required
- Restriction, rather than deletion of personal data insofar as:
 - A law prohibits erasure
 - Erasure would impair legitimate interests of the data subject.
 - The data subject disputes that their personal data is correct, and it cannot be clearly ascertained whether their information is correct or incorrect.

4.4.5 Profiling & automated decision making

Pets Ltd will only engage in profiling and automated decision making where is necessary to enter into or perform a contract with the data subject or where it is authorised by law.

Where a Pets Ltd entity utilises profiling and automated decision making, this will be disclosed to the relevant data subjects. In such cases the data subject will be given the opportunity to:

- Express their point of view
- Obtain an explanation for the automated decision
- Review the logic used by the automated system
- Supplement the automated system with additional data

- Have a human carry out a review of the automated decision
- Contest the automated decision
- Object to the automated decision-making being carried out

Each Pets Ltd entity must also ensure that all profiling and automated decision making relating to a data subject is based on accurate data.

4.4.6 Digital Marketing

Pets Ltd will not send promotional material or direct marketing material to a contact through digital marketing channels such as mobile phones, email and the internet, without first obtaining their consent. Any Pets Ltd entity wishing to carry out a digital marketing campaign without obtaining prior consent from the data subject must first have it approved by the management team.

Where personal data processing is approved for digital marketing purposes, the data subject must be informed at the point of first contact that they have the right to object, at any stage, to having their data processed for such purposes. If the data subject puts forward an objection, digital marketing related processing of their personal data must cease immediately, and their details should be kept on a suppression list with a record of their opt out decision, rather than being completely deleted.

It should be noted that where digital marketing is carried out in a business to business context, there is no legal requirement to obtain an indication of consent to carry out digital marketing to individuals provided that they are given the opportunity to opt out.

4.5 Data Retention

To ensure fair processing, personal data will not be retained by Pets Ltd for longer than necessary in relation to the purposes for which it was originally collected, or for which it was further processed.

The length of time for which Pets Ltd entities need to retain personal data is set out in the personal data retention schedule. This takes in to account the legal and contractual requirements, both minimum and maximum, that influence the retention periods set forth in the schedule. All personal data should be deleted or destroyed as soon as possible where it has been confirmed that there is no longer a need to retain it.

4.6 Data Protection

Each Pets Ltd entity will adopt physical, technical, and organisational measures to ensure the security of personal data. This includes the prevention of loss or damage, unauthorised alteration, access of processing, and other risks to which it may be exposed by virtue of human action or the physical or natural environment.

The minimum set of security measures to be adopted by each Pets Ltd entity is provided below:

- Prevent unauthorised persons from gaining access to data processing systems in which personal data processed.
- Prevent persons entitled to use a data processing system from accessing personal data beyond their needs and authorisations.
- Ensure that personal data in the course of electronic transmission during transport cannot be read, copies, modified or removed without authorisation.
- Ensure that access logs are in place to establish whether, and by whom, their personal data was entered into, modified on or removed from a data processing system.
- Ensure that in the case where processing is carried out by a data processor, the data can be processed only in accordance with the instructions of the data controller.

- Ensure that personal data is protected against undesired destruction or loss
- Ensure that personal data collected for different purposes can and is processed separately
- Ensure that personal data is not kept longer than necessary

4.7 Data Subject Requests

The management team will establish a system to enable and facilitate the exercise of data subject rights related to:

- Information access
- Objection to processing
- Objection to automated decision making and profiling
- Restriction of processing
- Data portability
- Data rectification
- Data erasure

In an individual makes a request relating to any of the rights listed above, Pets Ltd will consider each such request in accordance with all applicable data protection laws and regulations. No administration fee will be charged for considering and/or complying with such a request unless the request is deemed to be unnecessary or excessive in nature.

Data subjects are entitled to obtain, based upon a request made in writing to the management team and upon successful verification of their identity the following information about their own personal data:

- The purposes of the collection, processing, use and storage of their personal data.
- The source(s) of the personal data, if it was not obtained from the data subject
- The categories of personal data stored for the data subject
- The recipients or categories of recipients to whom the personal data has been or may be transmitted, along with the location of those recipients.
- The envisaged period of storage for the personal data or the rationale for determining the storage period
- The use of any automated decision-making, including profiling.
- The right of the data subject to:
 - Object to processing of their personal data
 - Lodge a complaint with the data protection authority
 - Request rectification or erasure of their personal data
 - Request restriction of processing of their personal data

All requests received for access to or rectification of personal data must be directed to the management team, who will log each request as it is received. A response to each request will be provided within 30 days of the receipt of the written request from the data subject. Appropriate verification must confirm that the requestor is the data subject or their authorised legal representative. Data subjects shall have the right to require Pets Ltd to correct or supplement erroneous, misleading outdated or incomplete personal data.

If Pets Ltd cannot fully respond to the request within 30 days, the management team shall nevertheless provide the following information to the data subject, or their authorised legal representative within the specified time:

- An acknowledgement of receipt of the request

- Any information located to date
- Details of any requested information or modifications which will not be provided to the data subject, the reason(s) for the refusal, and any procedures available for appealing the decision.
- An estimated date by which any remaining responses will be provided.
- An estimate of any costs to be paid by the data subject
- The name and contact information of the Pets Ltd individual who the data subject should contact for follow up.

It should be noted that situations may arise where providing the information requested by a data subject would disclose personal data about another individual. In such cases, information must be redacted or withheld as may be necessary or appropriate to protect that person's rights.

4.8 Law Enforcement Requests and Disclosures

In certain circumstances, it is permitted that personal data be shared without the knowledge or consent of a data subject. This is the case where the disclosure of the personal data is necessary for any of the following purposes:

- The prevention or detection of crime
- The apprehension or prosecution of offenders
- The assessment or collection of a tax or duty
- By the order of a court or by any rule of law

If a Pets Ltd entity processes personal data for one of these purposes, then it may apply an exception to the processing rules outlined in this policy but only to the extent that not doing so would be likely to prejudice the case in question.

If any Pets Ltd entity received a request from a court or any regulatory or law enforcement authority for information relating to a Pets Ltd contact, you must immediately notify the management team who will provide comprehensive guidance and assistance.

4.9 Data Training

All Pets Ltd employees that have access to personal data will have their responsibilities under this policy outlined to them as part of their staff induction training. In addition, each Pets Ltd entity will provide regular data protection training and procedural guidance for their staff.

The training and procedural guidance set forth will consist of at a minimum the following elements:

- The data protection principles set forth in section 4.2
- Each employee's duty to use and permit the use of personal data only by authorised persons and for authorised purposes
- The need for, and proper use of, the forms and procedures adopted to implement this policy.
- The correct use of passwords, security tokens and other access mechanisms
- The importance of limiting access to personal data, such as by using password protected screen savers and logging out when systems are not being attended by an authorised person.
- Securely storing manual files, print outs and electronic storage media.
- The need to obtain appropriate authorisation and utilise appropriate safeguards for all transfers of personal data outside of the internal network and physical office premises
- Proper disposal of personal data by using secure shredding facilities.
- Any special risks associated with departmental activities or duties

4.10 Data Transfers

Pets Ltd entities may transfer personal data to internal or third-party recipients located in another country where that country is recognised as having adequate level of legal protection for the rights and freedoms of the relevant data subjects. Where transfers need to be made to countries lacking an adequate level of legal protection (i.e. third countries), they must be made in compliance with an approved transfer mechanism.

Pets Ltd entities may only transfer personal data where one of the transfer scenarios listed below applies:

- The data subject has given consent to the proposed transfer
- The transfer is necessary for the performance of a contract with the data subject
- The transfer is necessary for the implementation of pre-contractual measures taken in response to the data subjects request.
- The transfer is necessary for the conclusion or performance of a contract concluded with a third party in the interest of the data subject.
- The transfer is legally required on important public interest grounds.
- The transfer is necessary for the establishment, exercise or defence of legal claims.
- The transfer is necessary to protect the vital interests of the data subject.

4.10.1 Transfers to Third Parties

Each Pets Ltd entity will only transfer personal data to or allow access by third parties when it is assured that the information will be processed legitimately and protected appropriately by the recipient. Where third party processing takes place, each Pets Ltd entity will first identify if, under applicable law, the third party is considered a data controller, or a data processor of the personal data being transferred.

Where the third party is deemed to be a data controller, the Pets Ltd entity will enter into, in cooperation with the management team, an appropriate agreement with the controller to clarify each party's responsibilities in respect to personal data transferred.

Where the third party is deemed to be a data processor, the Pets Ltd entity will enter into, in cooperation with the management team, an adequate processing agreement with the data processor, the agreement must require the data processor to protect the personal data from further disclosure and to only process personal data in compliance with Pets Ltd instructions. In addition, the agreement will require the data processor to implement appropriate technical and organisation measures to protect the personal data as well as procedures for providing notification of personal data breaches.

When a Pets Ltd entity is outsourcing services to a third party (including cloud computing services), they will identify whether the third party will process personal data on its behalf and whether the outsourcing will entail any third country transfers of personal data. In either case, it will make sure to include, in cooperation with the management team, adequate provisions in the outsourcing agreement for such processing and third country transfers.

The management team shall conduct regular audits of processing of personal data performed by third parties, especially in respect of technical and organisational measures they have in place. Any major deficiencies identified will be reported to and monitored by the Practice Manager and Directors.

4.11 Complaints Handling

Data subjects with a complaint about the processing of their personal data, should put forward the matter in writing to the management team. An investigation of the complaint will be carried out to the extent that is appropriate based on the merits of the specific case. The management team will inform the data subject of the progress and the outcome of the complain within a reasonable period.

If the issue cannot be resolved through consultation between the data subject and the management team, then the data subject may, at their option, seek redress through mediation, binding arbitration, litigation, or via complaint to the data protection authority within the applicable jurisdiction.

4.12 Breach Reporting

Any individual who suspects that a personal data breach has occurred due to the theft or exposure of personal data must immediately notify the management team providing a description of what occurred. Notification of the incident can be made via email to the Practice Manager <Siobhan.park@newnhamvets.com>, by calling 01622 734555.

The management team will investigate all reported incidents to confirm whether or not a personal data breach as occurred. If a personal data breach is confirmed, the management team will follow the relevant authorised procedure based on the criticality and quantity of the personal data involved. For severe personal data breaches, the Practice Manager along with the directors will initiate and chair an emergency response team to coordinate and manage the personal data breach response.

5. Policy Maintenance

All inquiries about this policy, including requests for exceptions or changes should be directed to the management team via email the Administration Manager <lucyl@newnhamvets.com>.

5.1 Publication

This policy shall be available to all Pets Ltd employees.

5.2 Effective Date

This policy is effective as of 01st May 2018.

5.3 Revisions

The Administration Manager is responsible for the maintenance and accuracy of this policy. Notice of significant revisions shall be provided to Pets Ltd employees.

6. Personal Data Retention Schedule

Type of Record	Retention Period	Reason for length of period
Basic employee record: start date, end date, reason for leaving, job role	20 years	Provision of references, statistical historical purposes
Personnel files including training records and notes of disciplinary and grievance hearings	6 years from last day of employment	References and potential litigation
Application forms/interview notes	12 months	Time limits on litigation
Facts relating to redundancies	6 years	As above
Facts relating to redundancies (20 or more)	12 years	Limitation Act 1980
Statutory Maternity Pay records and calculations	3 years from the end of the tax year they relate to	
Parental leave	5 years from the birth/adoption of the child OR 18 years if the child receives a disability allowance	Time limits on litigation
Statutory Sick pay and records and calculations	6 years from last day of employment	As above
Wages and salary records (including overtime, bonuses and expenses)	6 years	Taxes management act 1970
Accident books, and records and reports of accidents	3 years	Social Security (Claims and Payments) Regulations 1979; RIDDOR 1985
Health Records where reason for termination of employment is connected with health	6 years from last day of employment	Time limits of litigation
Records relating to working time	2 years from the date they were made	The Working Time Regulations 1998
Medical records kept by reasons of the control of substances hazardous to health regulations 1999	40 years	Control of Substances Hazardous to Health Regulations 1999