

## **Privacy policy**

This policy explains how and why we collect, use, hold and disclose your personal information.

**"We", "us" and "our"** means CVS Vets (Australia) Pty Ltd ACN 667 654 686 and our related bodies corporate, registered office c/- BDO Services, Level 10, 12 Creek Street, Brisbane QLD 4000.

You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy.

### **What is personal information?**

Personal information is any information or an opinion about an identified individual or an individual who can be reasonably identified from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

### **What personal information do we collect and hold?**

We collect information about you and your interactions with us, for example, when you visit a clinic, purchase any products from us, call us, apply for a job or otherwise visit our websites. The information we collect from you may include your name, date of birth, address, email address, phone number, pet details, pet insurance information, credit card details, details and history of visiting the clinic and purchases of products and details of enquiries or complaints you make. If you are a job applicant or potential candidate, additional information we collect may include your work history, references and professional registration details.

We may collect information about how you access, use and interact with our websites. This information may include:

- (a) the location from which you have come to the site and the pages you have visited; and
- (b) technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system.

We use cookies on the website. A cookie is a small text file that the website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help manage the display and presentation of information on the website. You may refuse to use cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the website.

### **Why do we collect, hold and use your personal information?**

We collect, hold and use your personal information so that we can:

- (a) provide you with veterinary services, and manage our relationship with you, including for the purpose of improving our services and support;
- (b) contact you, for example, to respond to your queries or complaints, or if we need to tell you something important;
- (c) comply with our professional standards, legal obligations and assist government and law enforcement agencies or regulators;

- (d) identify and tell you about other products or services that we think may be of interest to you; or
- (e) if you are a job applicant or potential candidate, to consider you for employment.

If you do not provide us with your personal information, we may not be able to provide you with our services, communicate with you or respond to your enquiries.

### **How do we collect your personal information?**

We will collect your personal information directly from you whenever you interact with us.

Additionally, we may automatically obtain information about you such as your image or your vehicle registration number via our CCTV systems operating at our clinics. We operate CCTV for our legitimate interests of helping to secure our premises and keep our customers, visitors and staff safe.

We may also record telephone calls for training, quality assurance and monitoring purposes.

We may collect information from third parties in the following circumstances:

- (a) From time to time, we acquire other businesses. Such transactions generally involve the disclosure of personal information from the vendor organisation to us, either as part of the due diligence process or as a result of a transfer of assets or company ownership. It may also be collected from our internet searches. In such cases, we collect the personal information already held by the newly acquired business.
- (b) When you are referred to one of our clinics, we may collect information from the referrer (which may be part of our group of companies or a third party).
- (c) We may collect information about you from recruitment service providers or referees, if you apply or are considered for a job with us.
- (d) We may collect information about potential candidates from publicly available platforms such as LinkedIn and Seek for recruitment purposes.
- (e) We may collect your information from national, local and privately operated pet registries to confirm the ownership of your pet or to contact you if your pet is lost and has been brought to one of our clinics.

### **How do we store and hold personal information?**

We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and systems may include:

- (a) the use of identity and access management technologies to control access to systems on which information is processed and stored;
- (b) requiring all employees to comply with internal information security policies and keep information secure;

- (c) monitoring and regularly reviewing our practise against our own policies and against industry best practice.

We will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the Australian Privacy Principles ("APP").

### **Who do we disclose your personal information to, and why?**

We may transfer or disclose your personal information to our related companies.

We may disclose personal information to external service providers and professional advisers so that they may perform services for us or on our behalf. Examples are solicitors and accountants, payment processors, data entry service providers, marketing agencies, market researchers, mailing houses, network administrators, labour hire, virtual and online veterinary medicine consultation providers, and debt collectors – each of which may have their own privacy policies outlining how they handle personal information.

It is our policy to consider the extent to which our service providers comply with privacy principles under applicable laws and to seek supporting contractual commitments from them.

We may also disclose your personal information to others outside our group of companies where:

- (a) we are required or authorised by law to do so;
- (b) you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- (c) we are otherwise permitted to disclose the information under the *Privacy Act 1988* (Cth).

Examples include:

- (a) The relevant State veterinary regulator when responding to an investigation or complaint.
- (b) Third party referral clinics so that they can arrange appointments, tests, treatments and services if your pet needs to be referred to a hospital or specialist.
- (c) Laboratories and Animal Crematoria, so that we can arrange tests, treatments and services and obtain results on your behalf.
- (d) Your insurer, so that we can obtain permission to perform certain investigations and treatments at their expense. Also, to arrange payment for investigations and treatments provided.
- (e) Banks and payment service providers so that we can deal with payments and refunds where necessary.
- (f) Debt collection agencies, should you fall behind with payments for the services we provide.
- (g) Email providers, printers and mailing houses, so we can send you reminders, administrative information relating to the way we provide services to you, information about animal health issues relevant to you and marketing communications if you agree.
- (h) Law enforcement, government and other agencies should we receive a request from them to assist with any investigations, or we deem it necessary.
- (i) Other clinics, if you decide to move to a new clinic and want to transfer your information.

- (j) Charities, in the unfortunate event that your pets find themselves with a charity for the facilitation of rehoming or other means, we may provide them with any necessary details for the continuation of animal welfare or other relevant matters.
- (k) Third parties such as the police, RSPCA or other authorities where we are unable to reach you for consent and unlikely to be able to for some time, we may disclose necessary information to third parties for the facilitation of continuity of pet care.
- (l) Third party software providers, where we implement and you make use of our third party provided apps, your data will be shared to facilitate a more convenient, streamlined and more accessible process.
- (m) If the ownership or control of all or part of our business changes, we may transfer your personal information to the new owner.

### **Do we disclose personal information to overseas recipients?**

We may disclose your personal information to recipients which are located outside Australia.

Those recipients are likely to be located in the United Kingdom.

Our reasons are generally:

- (a) in connection with services from a provider who is located, or uses locations outside one of Australia;
- (b) for disclosures between ourselves and our other related companies. Our main company location is the United Kingdom;
- (c) in connection with insurance arrangements, for example public liability issues involving an overseas insurer.

### **Do we use your personal information for marketing?**

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. These communications are sent in various forms, including mail, SMS, email and social media. Individuals can opt-out of receiving direct marketing communications at any time by using opt-out facilities provided in direct marketing communications.

### **Access to and correction of your personal information**

You may access or request correction of the personal information that we hold about you by contacting us. Our contact details are set out below. There are some circumstances in which we are not required to give you access to your personal information.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date, complete, relevant and not misleading.

### **Your rights under the EU GDPR**

Under the European Union (EU) General Data Protection Regulation (GDPR), as a data subject you have the right to:

- (a) access your data;
- (b) have your data deleted or corrected where it is inaccurate;
- (c) object to your data being processed and to restrict processing;
- (d) withdraw consent to having your data processed;
- (e) have your data provided in a standard format so that it can be transferred elsewhere; and
- (f) not be subject to a decision based solely on automated processing.

### **(Data Subject Rights)**

We have processes in place to deal with Data Subject Rights requests. Our actions and responsibilities will depend on whether we are the controller or processor of the personal data at issue. Depending on our role as either a controller or processor, the process for enabling Data Subject Rights may differ, and are always subject to applicable law. Please refer to the Contact Details section of this policy if you would like to make a Data Subject Rights request.

### **Complaints**

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (OAIC) ([www.oaic.gov.au](http://www.oaic.gov.au)) for guidance on alternative courses of action which may be available.

### **Contact details**

If you have any questions, comments, requests or concerns, please contact us at:

[Dataprotection@cvsvets.com.au](mailto:Dataprotection@cvsvets.com.au)

### **Changes to this policy**

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website or by contacting us at the contact details above.