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Introduction

Welcome to Vet-AI Limited's privacy policy.

Vet-AI Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our websites and/or contact us by way of our Apps or other systems (regardless of where you visit them from) or become a customer of Vet-AI Limited, and also tells you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here: [\[LINK\]](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. *[IMPORTANT INFORMATION AND WHO WE ARE]*

2. *[THE DATA WE COLLECT ABOUT YOU]*

3. *[HOW IS YOUR PERSONAL DATA COLLECTED?]*

4. *[HOW WE USE YOUR PERSONAL DATA]*

5. *[DISCLOSURES OF YOUR PERSONAL DATA]*

6. *[INTERNATIONAL TRANSFERS]*

7. *[DATA SECURITY]*

8. *[DATA RETENTION]*

9. *[YOUR LEGAL RIGHTS]*

10. *[GLOSSARY]*

1. **Important information and who we are**

Purpose of this privacy policy

This privacy policy aims to give you information on how Vet-AI Limited collects and processes your personal data, including any data you may provide through this website, through any App or other system operated by us, by way of the telephone or by any other means or medium, when you register with us, take part in any consultation with us or any person working for us by way of the website or any App or other system, when you purchase a product or service from us or using any system or platform operated by us, take part in a competition or otherwise engage with us in any way.

This website is not, and the various systems we operate and the products and services we offer are not, intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Vet-AI Limited, a company incorporated in England and Wales with the registered number 11343174 and whose registered office is at Ebble House, Odstock, Salisbury, England, SP5 4JB) is the controller and responsible for your personal data (collectively referred to as "Vet-AI", "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights as a Data Subject under the Data Protection Legislation, please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: Vet-AI Limited

Name or title of DPO:

Email address:

Postal address:

Telephone number:

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on [DATE]. Historic versions are archived here: [LINK] .

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our websites, Apps and other systems we use for any form of communication with you may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites, plug-ins and applications and are not responsible for their privacy statements. When you leave our websites, Apps and other systems we encourage you to read the privacy policy of every website or other system you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **"Identity Data"** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, together with details of your physical appearance in any of the Usage Data referred to below.
- **"Contact Data"** includes billing address, delivery address, email address and telephone numbers.
- **"Financial Data"** includes bank account and payment card details.
- **"Health Related Data"** includes any details concerning your mental and/or physical health and/or wellbeing, and/or any condition affecting you, which you disclose to us at any time.
- **"Transaction Data"** includes details about payments to and from you and other details of products and services you have purchased from us.
- **"Technical Data"** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access websites, Apps and other systems we use for any form of communication with you.
- **"Profile Data"** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses, together with details of any pets or companion animals you own or care for or with which you are connected or have owned and/or cared for or with which you have been connected in the past.
- **"Usage Data"** includes information about how you use our websites, Apps and any other systems we use for any form of communication with you, together with records and/or recordings of your usage of the same in the form of photography, film and video footage with or without sound, sound recordings and other records relating to any consultation we may have with you in relation to any pet or companion animal you own and/or care for or with which you are connected, together with details of your enquiries in relation to and purchases of our products and services and/or any products and/or services you have accessed through us, through any website, App or other system operated by us, or as a result of any referral or recommendation by us.
- **"Marketing and Communications Data"** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **"Aggregated Data"** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal

data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

EXCEPT AS SET OUT BELOW UNDER THE HEADING 'HEALTH RELATED DATA', we do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. Health Related Data

We may collect medical or health related data in relation to an individual who uses any of our websites, Apps, systems, products or services, where this has been disclosed to us in order to enable such use by that individual or because it is relevant in any way to the facility, goods or services in question which are or may be supplied to that individual. We use this information ourselves and may disclose it to a third party organisation if required in connection with any further goods and/or services required by that individual from that third party organisation.

EXCEPT AS PROVIDED ABOVE, we will not disclose medical or health related information to any other person unless permitted to do so under the Data Protection Legislation.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data, Contact Data, Financial Data, Health Related Data, Transaction Data, Profile Data, Usage Data and Marketing and Communications Data by filling in forms or by corresponding or interacting with us by post, phone, email or otherwise, and/or by way of our website, or by way of any App or system operated by us . This includes personal data you provide when you:
 - apply to use our facilities or for us to supply our products or services;
 - create an account on our website or in any App or system operated by us;
 - subscribe to our service or publications;
 - engage in any consultation or other direct communication with us by way of our website or any App or system operated by us;
 - request the supply of any goods or services from us;
 - make any enquiry or request any information from us;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website or any App or system operated by us, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [LINK] for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers such as Google based outside the EEA;
 - (b) advertising networks which we may use now or in the future based inside or outside the EEA; and

(c) search information providers based inside or outside the EEA.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Paypal, VISA, Mastercard and other providers of such services based inside or outside the EEA
- Identity, Contact and Profile Data from our commercial and research partners based inside or outside the EEA.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EEA.
- [ANY OTHER WAYS YOU COLLECT PERSONAL DATA].

4. **How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Click here [[LINK TO GLOSSARY, LAWFUL BASIS](#)] to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To provide a veterinary consultation with you and your pet or companion animal by way of our website or any App or system operated by us, and to provide any advice or recommendations following on from that consultation	(a) Identity (b) Contact (c) Financial (d) Health Related (e) Transaction (f) Technical (g) Profile (h) Usage (i) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to ensure quality in our service provision and to manage our commercial risk) (c) Necessary for our legitimate interests (to develop our products and services and the technology that supports them, and to train our staff) (d) Vital Interest

<p>To process and deliver your order including:</p> <p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>

<p>To administer and protect our business and its websites, Apps and other systems (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website, App and other system content and notifications and advertisements to you and measure or understand the effectiveness of the notifications and/or advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our websites, Apps and other systems, our products/services, our technology and our marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our websites, Apps and other systems updated and relevant, to develop our business and technology, and to inform our marketing strategy)</p>

<p>To make suggestions and recommendations to you about goods or services that may be of interest to you or of benefit to your pet or companion animal</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Health Related (e) Transaction (f) Technical (g) Profile (h) Usage (i) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to develop our products/services and grow our business)
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Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established a privacy centre where you can view and make certain decisions about your personal data use: [\[PRIVACY CENTRE LINK\]](#)

Promotional offers from us

We may use your Identity, Contact, Health Related, Transaction, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have given your consent to do so, or if you have requested information from us or purchased goods or services from us, or if you have provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into our website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at the following address _____ at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, veterinary consultation, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [LINK TO YOUR COOKIE POLICY].

Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact at the following address at any time:

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table "**Purposes for which we will use your personal data**" above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Specific third parties listed in the table "**Purposes for which we will use your personal data**" above or such as our commercial partner organisations that may supply products or services to you directly following any purchase by you facilitated by way of our websites, Apps or other systems or otherwise following referral by us.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we will seek to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see *European Commission: Adequacy of the protection of personal data in non-EU countries*.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.

- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see *European Commission: EU-US Privacy Shield*.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

By law we also have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see **your legal rights** below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **Request access to your personal data.**
- **Request correction of your personal data.**
- **Request erasure of your personal data.**
- **Object to processing of your personal data.**
- **Request restriction of processing your personal data.**
- **Request transfer of your personal data.**
- **Right to withdraw consent.**

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. **Glossary**

LAWFUL BASIS

"Legitimate Interest" means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

"Performance of Contract" means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

"Comply with a legal obligation" means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

"Vital Interest" means processing your personal data where that processing is essential to protect your life or the life of another person. Certain processing of this nature may serve both important

grounds of public interest and the vital interests of the data subject as for instance when processing is necessary for humanitarian purposes, including for monitoring epidemics and their spread or in situations of humanitarian emergencies, in particular in situations of natural and man-made disasters.

THIRD PARTIES

Internal Third Parties

- Veterinary nurses and surgeons and their applicable support staff where the same have entered into any contractual obligations with us to supply services accessed or used by you

External Third Parties

- Service providers who provide various support services such as IT and system administration and data storage and/or transmission services in particular [], [], and [];
- Service providers to whom we may subcontract any of our obligations in relation to any supply of goods and/or services to you or any aspect of the same;
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services and other services to support us;
- Providers of market research, after sales services, and reviews and customer feedback services;
- Financial services providers for payment process such as PayPal, VISA, Matercard and related services;
- HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances;
- [DETAILS OF ANY OTHER THIRD PARTIES, FOR EXAMPLE, MARKET RESEARCHERS, FRAUD PREVENTION AGENCIES, PRICE COMPARISON SITES AND SO ON.]

YOUR LEGAL RIGHTS

You have the right to:

"Request access" to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

"Request correction" of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

"Request erasure" of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

"Object to processing" of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

"Request restriction of processing" of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

"Request the transfer" of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

"Withdraw consent at any time" where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.