

## **PRIVACY NOTICE**

This privacy policy provides information about how we Prognostix Ltd, a company registered in England and Wales under number 10423026, whose registered office is at 4 King Square, Bridgwater, Somerset, TA6 3YF (“the Company”) will use or process personal data about individuals, our staff and our clients.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used under the General Data Protection Regulation (GDPR) due to come into effect on the 25<sup>th</sup> May 2018.

### **This Privacy Notice**

Prognostix Ltd has appointed Anna Wieczorek and Victoria Sheppard who will deal with your request and enquiries concerning our use of your personal data and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. They may be contacted on 01392 872934 or [info@prognostix-uk.com](mailto:info@prognostix-uk.com)

### **Why do we need to process your data?**

In order for us to carry out our ordinary duties to our staff and clients, we may process a wide range of personal data about individuals as part of our daily operation. Some of this activity is carried out in order to fulfil its legal rights, duties and obligation including those under a contract with its staff and clients. Other uses of personal data will be made in accordance with our legitimate interests, or the legitimate interest of another, provided that these are not outweighed by the impact on individuals, and provide it does not involve special or sensitive types of data.

Prognostix Ltd expects that the following uses will fall within that category of its legitimate interest:

- To provide customer service to our clients
- To provide technical expertise with system installation and support on farm
- To notify you of any changes to our services and practice updates
- To process communications and provide a veterinary based consultancy service with respect to the analysis of data from the farm
- To contact you for matters relating to the invoicing and/or payments to your account.

### **Information we hold and process**

This will include by way of example:

- Your name, address and contact numbers for your business and additional site addresses, this may include contact details of employees if you would like to be recorded on your account
- Email addresses for sending documentation relevant to you, including information on the system and account invoicing and statements
- Images captured by our CCTV system on site
- Farm location data gathered through the system for data analysis

### **How is the information collected?**

The information we have collected about you has come from different places including:

- Directly from you upon registering your interest with the PrognostiX and installing and purchasing the system.
- Directly from you from an enquiry.

- From a third party acting on your behalf, such as a company manager providing your details for direct contact with you
- We have CCTV in and around the practice for the purposes of prevention and detection of crime

We'll only collect your information in line with relevant regulations and law and this may relate to any of our products or services you request, currently hold or have held in the past.

You're responsible for making sure you give us accurate and up to date information. If you provide information for another person on your account, you will need to tell them how to find the Privacy Notice and make sure they agree to us using their information for the purposes set out in it.

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

In the course of providing a service to you, we may sometimes be required to share your details with third parties for example the companies that manage our data analysis systems. We only share the information that is necessary at the time, and those third parties do not have permission to use your data for anything else. We have a strict contract in place that requires those third parties to keep your information secure.

We may also have to disclose or share your personal data in order to comply with any legal obligation, or to protect our rights, or safety of our employees, our customer or others.

In the event that our business is transferred, sold or integrated with another business, your details may be disclosed to our advisers or any prospective purchaser's advisers and may be passed on to the new owners of the business.

We will never sell your data to third parties for the purpose of marketing.

### **Data Accuracy and Security**

Prognostix Ltd will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate. Individuals must please notify us of any significant changes to important information such as contact details held about them.

An individual has the right to request that any out of date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations) under the GDPR Law.

Prognostix Ltd will take appropriate technical and organisation steps to ensure the security of personal data about individuals, including policies around the use of technology and devices, and the access to our systems. All staff are made aware of this policy and their duties under the GDPR Law and will receive relevant training.

### **Retention of Data**

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

We will continue to retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

A limited and reasonable amount of information will be kept for archiving purposes, for example, even where you have requested we no longer keep in touch with you, we need to keep a record of the fact in order to fulfil your wishes (called a 'suppression record').

## **Your Rights**

Individuals have various rights under the GDPR Law to access and understand personal data about them held by us and in some case ask for it to be erased or amended or have it transferred to others or for us to stop processing this data but subject to certain exemptions and limitations

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing Anna Wieczorek and Victoria Sheppard, Nutwell Estate, Lymptone, Exmouth, EX8 5AN.

We will endeavour to respond to any such requests as soon as is reasonable practicable and in any event with the statutory time-limits of 1 month.

You should be aware that the right of access is limited to your own personal data and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal privilege (for example legal advice given to or sought by us, or documents prepared in connection with legal action).

You may have heard of your 'right to be forgotten', however we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data for example, a legal requirement, or where it may fall within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

## **This Policy**

Prognostix Ltd will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you.

## **Queries & Complaints**

If you have any queries concerning the processing of your personal data you should contact our Data Protection Officer Kayleigh Walters on 01392 872895 or email [info@prognostix-uk.com](mailto:info@prognostix-uk.com)

In the event that you have not received a response within 30 days you have the right to contact the ICO <https://ico.org.uk/global/contact-us/email> or telephone 0303 123 1113.

