



## GDPR Compliance

Welcome to Ballinger Equine Limited's privacy policy.

Ballinger Equine 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 and tell you about your privacy rights and how the law protects you.

### 1. Important information and who we are

#### Purpose of this privacy policy

This privacy policy aims to give you information on how Ballinger Equine collects and processes your personal data including, but not limited to, any data you may provide such as when you contact us (including but not limited to where you use the 'contact us' form on our website), when we register you as a client or when you purchase a product from us or use our services.

We do not usually collect data relating to children however in limited circumstances we may process personal data relating to children (name and contact number) as an emergency contact. If we do process children's data, we ensure that we have identified the correct lawful basis for doing so. Where we are relying on consent as the lawful basis, we or our clients will obtain parental consent for children under the age of 13.

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

Ballinger Equine Ltd is the 'Controller' of the personal data you provide to us (collectively referred to as "we", "us" or "our" in this privacy policy).

We have appointed a data privacy manager 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 please contact the data privacy manager using the details set out below.

#### Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager:

**Full name of legal entity:** Ballinger Equine Limited  
**Email address:** a.hillier@ballingerequine.com  
**Postal address:** East Barn, Fairclough Hall Farm, Halls Green, Hitchin SG4 7DP  
**Telephone number:** 01462 414008

#### EQUINE VETERINARY SURGEONS

East Barn, Fairclough Hall Farm, Halls Green, Hitchin SG4 7DP  
01462 414008 | office@ballingerequine.com | ballingerequine.com



## 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 in August 2023.

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 website 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 and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## Your Personal Data

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).

## What we need

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.
- **Contact Data** includes billing address, delivery address (which may also include gate/security codes for access to premises where your horses, ponies and/or donkeys are kept), email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **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, 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 our website.
- **Profile Data** includes purchases or orders made by you.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences (as set out in the GDPR preferences form you have been asked to complete).



We may 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.

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.

#### **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 products, medicines or use our veterinary services). In this case, we may have to cancel a product or medicine, or we may not be able to provide you with a service but will notify you if this is the case at the time.

#### **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, Contact, Financial Data, Marketing and Communications Data by:
  - filling in and completing forms (i.e., registration form, general enquiries form, booking an appointment form, consent forms (including for euthanasia) or the 'contact us' form on our website);
  - corresponding with us by post, phone, email or otherwise;
  - arranging for emergency assistance;
  - arranging appointments;
  - arranging medications/treatment for your horses, ponies and/or donkeys (to include requesting prescriptions to be issued by us or other veterinary surgeons or pharmacies);
  - providing us with a copy of your equine passport;
  - purchasing products from our website;
  - requesting a refund or rebate;
  - applying for our products or services;
  - subscribing to our service or publications;
  - requesting marketing to be sent to you;
  - giving us feedback or contact.



- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - Identity and Contact Data provided by our customers (for example, if our customer has named you as their emergency or alternate contact);
  - Identity and Contact Data provided by your previous veterinary surgeons when we request clinical histories about your horses, ponies and/or donkeys;
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Windcave based inside and outside the UK;
  - Identity, Contact and Financial Data from debt management agencies;
  - Identity and Contact Data from the Central Equine Database;
  - Identity and Contact Data from equine insurance providers;
  - Identity and Contact Data from the Police , Fire and Rescue Services; or
  - Identity and Contact Data from local authorities, Department for Environment, Food & Rural Affairs (**DEFRA**) or other public health agencies/bodies.

#### **Why we need it**

We need to know your basic personal data in order to provide your horses and/or ponies and/or donkeys as registered with us, with veterinary care, treatment, and professional advice concerning general equine wellbeing, peak performance management, preventative healthcare, dietary management and vaccine courses.

We will not collect any personal data from you that we do not need in order to be able to provide you with a comprehensive veterinary care service and to meet animal welfare obligations.

Without your personal data we are not in a position to provide veterinary care for your horses, ponies and/or donkeys.

Your basic personal data may be recorded on veterinary medicine prescriptions, euthanasia consent forms, radiography consent forms, laboratory test and analysis requests, consents for prescribing unauthorised medicines (under cascade), pre-purchase examination certificates and disclaimers.

#### **What we do with it**

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.



Please refer to the Glossary section 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 (via your completed GDPR preferences form) before sending direct marketing (including third party) 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 client (and your horses, ponies and/or donkeys as patients).	(a) Identity (b) Contact	Performance of a contract with you.
To provide veterinary care and professional advice concerning general equine wellbeing, peak performance management, preventative healthcare, dietary management and vaccine courses to your horses, ponies and/or donkeys as patients).	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to enable us to provide the necessary veterinary care to your horses, ponies and/or donkeys, who are our patients).
To deal with requests for prescriptions (including where you ask us to provide these to other veterinary surgeons/pharmacies).	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you.
To attend emergency call-outs.	(a) Identity (b) Contact	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to ensure we can respond to emergency situations).
To process and deliver your order for products from us including: (a) Managing payments, fees and charges; (b) Collecting and recovering money owed to us; or (c) Dealing with any rebates or refunds.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to recover debts due to us).

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage our relationship with you which will include notifying you about changes to our terms or privacy policy.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation.
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	(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.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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).
To comply with our regulatory requirements.	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary for our legitimate interests (to comply with our legal and regulatory requirements).
To make suggestions and recommendations to you about goods or services that may be of interest to you.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business).
To provide you with alerts as to equine disease outbreaks in your area.	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to allow us to provide you relevant alerts).
To remind you about vaccine renewal deadlines.	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to ensure your horses, ponies and/or donkeys, as our patients, have relevant vaccinations).



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To invite you to equine health and performance management client evenings and events.	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business).
To inform you of any special offers, worming packages or discounts.	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business).
To monitor levels of exposure to radiation during diagnostics.	(a) Identity (b) Contact	Necessary for our legitimate interests (to ensure the safety of clinicians and third parties when carrying out diagnostics).

### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity, Contact, 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 only receive marketing communications from us based on your completed GDPR preferences form.

### 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 following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as set out above.

### 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 us.



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.

### **Disclosures of your personal data**

All the personal data we process internally is processed by our staff in the UK.

We may share your personal data with the External Third Parties set out below for the purposes set out in the table above.

- Service providers acting as processors based within inside and outside the United Kingdom who provide IT (including IT security) and hosting and maintenance services (such as Google, Guru, Microsoft, WooCommerce and WordPress).
- Service providers acting as processors based inside and outside the United Kingdom who provide payment processing services (such as Windcave).
- Service providers acting as processors based inside and outside the United Kingdom who provide marketing services (such as MailChimp).
- Service providers acting as processors based outside the United Kingdom who provide accounting software and veterinary practice software (such as Xero and Provet Cloud)
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers (such as equine insurers) based inside and outside the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- Regulators of our profession, including but not limited to the Royal College of Veterinary Surgeons (RCVS), the Veterinary Defence Society (VDS), the Veterinary Medicines Directorate, and Animal and Plant Health Agency.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Veterinary referral centres, hospitals or specialists (who may be based both inside and outside the United Kingdom) should we need to refer your horses, ponies and/or donkeys to them.
- Under our Terms of Business we may share your personal data with Debt Collection Services UK Ltd., HM Courts and Tribunal Service, High Court Enforcement Officers, and bailiffs in the lawful recovery of unpaid veterinary fees and charges.
- Laboratories, when we need to send samples for testing and analysis.
- Other veterinary surgeons or pharmacies if you ask us to issue and share medicine prescriptions.
- Delivery companies who deliver products you have ordered from us.
- Horse, pony and/or donkey transportation service providers.





- Companies and legally registered/licensed providers who undertake euthanising of horses, ponies and/or donkeys and the subsequent disposal of their remains.
- Emergency services (such as Police/Fire and Rescue) or local authorities.
- Sporting government bodies/agencies (to confirm vaccination status etc).
- DEFRA or Passport Issuing Office (in order to obtain passports or export health certificates).
- Public Health agencies, Health and Safety regulators/authorities (including the UK Health and Safety Executive).
- 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.

### **International transfers**

Some of our External Third Parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

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

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Government. For further details, see [International transfers | ICO](#); or
- Where we use certain service providers, we may use specific contracts as issued by the Information Commissioner's Office under Section 119A Data Protection Act 2018 which give personal data the same protection it has in the UK. These specific contracts currently include the International Data Transfer Agreement (**IDTA**) and the International Data Transfer Addendum to the European Commission's Standard Contractual Clauses (**Addendum**). For further details, see [International data transfer agreement and guidance | ICO](#).

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

### **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.



### How long we keep it

We are required under UK tax law to keep your basic personal data (name, address, contact details) for a minimum of 6 years after which time it will be destroyed. Should you wish to change your veterinary practice, once we have obtained your express prior consent, your personal data will be transferred to your new veterinary practice. Thereafter your data will be held only as long as UK law requires (including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements), after which time it will be destroyed. 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.

## 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.

### 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.

If you wish to raise a complaint on how we have handled your personal data, you can contact the manager responsible for data protection at Ballinger Equine who will investigate the matter.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO) the UK regulator for data protection issues ([www.ico.org.uk](http://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.