Independent Vetcare Ltd Privacy Notice

Welcome

Last updated: October 20, 2025

Donnington Grove Veterinary Group Ltd (trading as Donnington Grove Veterinary Group) ("we", "our", "us") is committed to protecting your personal data.

This Privacy Notice ("**Notice**") explains how we collect, use and protect information about you, who we may share it with, and the rights that you have. This Notice covers most of the ways in which you will interact with us, through our website, in our veterinary practices, on social media or via our apps (our "**Service**").

Please read this Notice carefully so that you understand your rights in relation to your personal data and how we will collect, use and process your personal data. This Notice may be supplemented by additional privacy related notices and policies that we provide from time to time. If we use your personal data for reasons not covered by this Notice, we will let you know. This could include by way of notifications, signage in specific locations or other messages.

If you do not agree with any part of this Notice, you should refrain from accessing our electronic media. Our website and Services are not intended for children, and we do not knowingly collect data relating to children.

We update this Notice from time to time and updates will apply only to information collected after the date of the change. We will note on our website when the Notice has been updated. Please check the website regularly for updates.

Please note that this Notice does not apply to information we collect and process about your animal, as such information, by itself, is not personal data under applicable data privacy laws.

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1. Who we are

Controller

We are the controller responsible for the processing of your personal data pursuant to the UK General Data Protection Regulation and UK Data Protection Act 2018, with the following details:

- UK Companies House registration number 08545050 with registered address at The Chocolate Factory, Keynsham, Bristol BS31 2AU.
- UK Information Commissioner's Office registration ZA809048.

We are part of the IVC Evidensia Group of Companies. You can find a list of IVC Evidensia Group Companies here which includes brands such as VetSuccess (FKA Easy Direct Debits), VetsNow, AnimalAir, Pawsquad amongst others, which act as separate controllers and have their own privacy notices.

2. The Personal Data we collect and how we use it

The table below sets out details of how we collect, process and use personal data:

Use of Personal Data	Type of Personal Data Used	How we collect data	Legal Basis processing	for
Provide the Services, including veterinary services and products to you including results of tests, treatment and providing emergency care.	Title, name, address, phone number, email address, name of your spouse or partner (if coowner of animal) or animal handler or others authorised to make decisions for your animal, preferred vet practice and information about your use or interaction with the Services.	Directly from you and/or from a veterinary practice (for example, where your animal is referred to us from another practice).	Performance Contract	of
If requested by you, register your animal to an IVC Pet health club® plan and provide such plan.	Title, name, email address, phone number, address, preferred vet practice, payment card details and direct debit preferences.			
Obtain payment for the provision of our Services.	Financial and billing Information such as your name,	Directly from you and/or credit		

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	address, email	reference	
	address, bank and	agencies.	
	card details.		
Provide you with website	Name, email	Directly from you.	
functionality and other	address,		
content, including to allow	information about		
you to register and	your use or		
maintain your account with	interaction with the		
_			
us (where applicable).	Website, log in		
	details and		
	account details		
	(where applicable).		
Provide you with service	Name, phone	Directly from you.	
messages by phone, SMS	number, email		
or email to remind you of	address and		
appointments, inform you	information about		
about security, privacy or	the Services you		
administrative related	have used or		
matters including your	requested.		
animal's health, for			
example vaccinations,			
health or wellness checks,			
general advice on			
behaviour or disease			
prevention (these			
communications are not			
marketing orientated, and			
we do not rely on consent).			
Sometimes, we rely on			
trusted third parties to			
conduct such service calls			
or messages on our behalf.			
Register animal microchip	Name, phone	Directly from you	Legal obligation
and identify animal owners	number and	or from the animal	
from information	regional location.	microchip	
associated with animal's	. sg.s.iat to sationi	databases.	
microchip (for example, to		databases.	
reunite a lost animal with			
their owner).			
Administer the website and	Name, contact	Directly from you	Legitimate Interest to
Services, conduct	details, data about	(in some cases,	run a successful and
troubleshooting, data	your use of the	automatically,	efficient business
analysis, testing, research,	website and	when you use the	and to ensure legal
statistical and survey	Services, data	website).	protection, safety of
analysis.	about products	,	all premise users and
	and Services		security of property.
	provided to you,		cooding of proporty.
	_ =		
	recordings of your		
	calls or online chat		

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	with our customer		
	service staff.		
Improve our Services to you and other clients, including by gathering feedback from you via surveys and analysing personal data about your use of our Services.	Name, email address, phone number, information about the use and interaction with our Services, recordings of your calls with our customer service staff.	Directly from you.	
Develop, train and deploy our tools and systems - including through artificial intelligence and machine learning – for the purposes of improving our Services through, for example, the use of chatbots (where relevant), diagnostic analytics and fraud detection features. We may also anonymise personal data for AI training purposes.	Name, contact details, data about your use of our Services.	Directly from you.	
Maintain the safety and security of our users, our clients, our staff, the animals in our care, our property and premises, our Services and business.	Account log in details (if applicable), name, address, CCTV footage (where we operate the CCTV cameras).	Directly from you or CCTV footage.	
Prevent or detect crime, or act in the public interest including for animal welfare purposes.	Name, address, phone number, email address, CCTV footage (where we operate the CCTV cameras),	Directly from you, CCTV footage, or from third parties such as other vet practices, or comanimalent authorities (e.g. the RSPCA).	
Handle complaints and queries including monitoring and recording phone calls for the purpose of quality assurance, training and compliance.	Name, contact details, information about the Services you have used or requested, call recordings.	Directly from you and/or from the Royal College of Veterinary Surgeons or other comanimalent authorities.	

Send or deliver to you marketing communications to provide information about our products and services (including services provided by the rest of the IVC Group) that may be of interest to you, including sending you offers, discounts or other promotions	Name, email address, phone number, marketing preferences, preferred vet practice and information about the Services you have used or requested.	Directly from you.	Legitimate Interest to promote our business, soft-opt in consent for existing customers or otherwise consent. You can opt-out of receiving marketing from us in person or via the phone at any of our veterinary practices or use the unsubscribe link included in our marketing communications.
Contact you either directly via telephone or through a telemarketing service provider to provide you with offers, discounts or other related offers.	Name, email address, phone number, marketing preferences, preferred vet practice and information about the Services you have used or requested.	Directly from you.	Legitimate Interest to promote our Services and keep our clients informed. You can opt out by registering with the UK National Telephone Preference Service (TPS), by contacting the veterinary practice or by telling the operator on the call that you do not want to receive marketing calls.
Build and generate insights to better understand our client base, inform our marketing campaigns and activities and/or identify new potential clients (lookalikes) based on information about our existing clients, exclude you from seeing advertisements, including through third party websites and platforms (such as custom audiences through Meta).	Name, email address, phone number and information related to your use and interaction with our Services,	Directly from you.	Legitimate interests to provide a better service and enhance our client base.

Support insurance claims.	Name, address, email address, phone, account number, signature and financial information (such as bank account details for reimbursement).	Directly from you and/or insurance company.	Consent
Deliver personalised content, promotional messages, and advertisements on our and/or third-party sites (including through advertising networks), that align with your interests and preferences.	Data related to your use and interaction with our website or Services, device data, IP address, general location data collected by cookies and tracking technologies (such internet activity, audience information), data collected by third-party sites about your use of their sites (e.g. interactions with our pages on social media platforms such as likes, following).	Directly from you, your computer, mobile phone or other device and from marketing and advertising partners including third-party platforms, such as social media platforms.	Consent (including soft-opt in for marketing to existing customers)
Run contests or promotions on social media.	Data related to your engagement with our social media pages and your participation in our contests or promotions including, your endorsements, likes, and photos/videos you post of you and your animal.	Directly from you or from your social media interactions.	

Marketing and publicity at	Photos taken at live	Directly from you.	
events.	events (e.g.		
	dog/cat/horse		
	shows, animal fairs		
	etc.), title, name,		
	email address,		
	phone number and		
	signature.		

In addition, we will use some or all of the above information to comply with any applicable legal obligations, to enforce any applicable terms and conditions and/ or terms of service, and to protect or defend the Services, our rights, the rights of our users, or others (for example we may process your personal data in relation to mediation services in relation to complaint resolution, animal welfare or regulatory investigations). If we sell or acquire assets, business units or companies, we process personal data to prepare and execute transactions (e.g. information about clients or their contact persons or employees), and we may disclose such information to potential buyers or sellers. We conduct such processing in our legitimate interests to operate a successful and efficient business.

We do not normally collect or use 'special category' (or sensitive) personal data, such as health data, except where it is provided to us voluntarily in the context of a client query or complaint, in which case we process such data in accordance with your consent or as necessary to exercise or defend our legal claims.

If you do not provide us with certain personal data (such as your name, address, financial information, or any other information that is essential for us to provide the Services), we may not be able to provide our Services to you.

If you have provided a third party's personal data (e.g. as part of your animal's record), you are responsible for informing them that we will process their personal data in accordance with this Notice, and you must obtain their consent to such processing.

3. Cookies

We use cookies and other similar technologies, such as pixels, to collect information about your browsing activities over time on our website and across different websites following your use of our Services. Please see our [Cookie Policy] for more information.

4. Who we share your personal data with

We may share your personal data with the following recipients:

IVC Evidensia Group

We may share your personal data with one or more IVC Evidensia Group Companies as we use global systems as well as group-wide integrated services and functions provided by employees in various companies of the Group to process personal data and provide our Services.

Third Party Controllers

We may share information with other organisations who are using your personal data for their own purposes, such as:

- Royal College of Veterinary Surgeons, RSPCA, SSPCA and other relevant authorities responsible for the regulation of veterinary services and animal welfare;
- Veterinary specialists, laboratories and animal health providers, hospitals, referrals, crematoria and agencies;
- Financial services providers, debt collection and credit reference agencies;
- Insurance and related companies, and other professional and legal advisors;
- Law enforcement agencies, courts, government authorities, regulators (such as RSPCA or RCVS) or other third parties when required by law (such as during an investigation) or to protect our rights or the rights of any third party;
- Advertisers, advertising networks, our social media partners (such as Meta and Google) and/or analytics providers;
- Other third parties, where any part of our business is outsourced, sold, merged, or subject
 to bankruptcy or other business transaction or re-organisation and where permitted by
 law, the new provider will become the controller of your personal data; and
- Other third parties as instructed by you, with your consent or as necessary to exercise or defend our legal claims.

Service Providers

We may share your personal data with our services providers who may process your personal data to assist us in providing you with our Services. These may include:

- Security vendors, website hosting vendors, as well as IT vendors that perform business operations for us;
- Call centre providers for customer service support, billing questions, making service calls for appointments and other outreach services as well as telemarketing;
- Third party providers or delivery services for supplying you with animal supplies, Animal Chip data, transportation of your animal to or from the veterinary practice or to/from daycare provider; and
- Veterinary laboratory and pharmacy services to process testing and provide medication or treatment.

Others associated with your animal's record

We may share your personal data with others you have nominated in your animal's record such as your spouse or partner (if co-owner of animal), animal handler or others authorised to make decisions for your animal (including ad hoc authorisations such as for kennels or boarding

providers), unless you provide your veterinary practice with written instructions that you wish to amend the record to remove their details.

5. International Transfers

Some of our business processes may be provided by our third-party providers outside of the UK or the EU, such as in India and the United States. Where we transfer your personal data outside the UK or the EU, we ensure that your personal data continues to be protected to the same standards by:

- ensuring that the importing country has been agreed by the relevant data protection regulators to provide an adequate level of protection; *or*
- making sure that regulator-approved contracts are in place to protect your personal data and rights (e.g. the UK addendum to the European Commission's Standard Contractual Clauses or the UK international data transfer agreement).

Please contact us by email (<u>privacy@ivcevidensia.com</u>) if you would like further information on the specific safeguards used when transferring your personal data out of the UK or the EU.

6. Keeping your personal data secure

We have security and other measures in place to help protect your personal data and limit how it can be accessed or used, and policies and procedures to identify and handle suspected personal data breaches and other security threats.

Please be aware that the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, your transmission of data is at your own risk; we cannot guarantee the security of your data transmitted from you to our network.

7. Data Retention

We retain your personal data only for as long as processing is reasonably necessary in accordance with applicable data privacy laws or in accordance with statutory exceptions, derogations or requirements.

When determining the length of time to retain your personal data, we consider various criteria, including whether we need the information to continue to provide you with our Services, resolve a dispute, enforce our contractual agreements, prevent harm, promote safety, security, and integrity, ensure animal welfare or protect ourselves, including our rights, property or products. We will also retain and use your personal data to the extent necessary to comply with our legal obligations, resolve disputes and enforce our terms and conditions, other applicable terms of service, and our policies. The retention period may also depend on legal or regulatory requirements to which we are subject.

Generally, your personal data will be retained for a period of 7 years from the date we stop providing our Service to you, unless:

• we are required by law, regulation or other requirements to retain such data for shorter or longer; and/or

• We need to exercise, defend or pursue legal claims.

8. Other important information

- Animal Data Your animal's clinical record and information about your animal, including animal's name, veterinary practice record, test results, vaccination, date of birth and/or death, litter, spay/neuter, disease, results of health or wellness checks and other treatment information is not "personal data" as defined by applicable data protection laws. This information may be shared with other veterinary or after-hours emergency vet practices and animal hospitals for your animal's treatment, continuity of care and with insurance companies for payment of services. We may also use or share this information with regulators, government agencies universities or veterinary pharmaceutical companies for veterinary health and welfare studies or analytics. We may also use a Animal Chip number with the network of official Animal Chip databases, to identify a lost, stolen or deceased animal.
- **Pet health club** Is a subscription service provided by us, and processing of your personal data associated with this service is carried out by the same controller as the controller of your veterinary practice.

9. Links to other websites

If you use our websites or apps and click on external links provided on our website, you will no longer be on our website or network and those sites will collect and process information about you for their own purposes so please refer to their applicable privacy policies.

10. Your Rights in relation to your personal data

You have the following rights in relation to your personal data, the right to:

- request information about how we are using your personal data;
- request a copy of your personal data;
- request the correction of any personal data that is inaccurate or completion of any personal data that is incomplete taking into account the purposes of processing;
- request the deletion of your personal data;
- withdraw your consent if you previously consented to processing of your personal data:
- request to stop processing your personal data, other than for storage purposes;
- object to our processing of your personal data;
- object to marketing; and
- transfer elements of your personal data to another service provider.

Some of these rights may be limited in certain circumstances, or subject to exemptions. For example, where fulfilling your request would adversely affect other individuals or our trade secrets or intellectual property, where there are overriding public interests or where we are required by law to retain your personal data. If you want to exercise any of your rights above, please complete a Rights request form or contact us at privacy@ivcevidensia.com.

You may also make a complaint to the UK Information Commissioner's Office.

11. Changes to your personal data

It is important that the personal data we hold about you is accurate and up to date. Please keep your veterinary practice informed if your personal data changes during your relationship with us so we can make the necessary updates to your record.

12. Contact details

We welcome your questions, comments, and concerns about this Notice or the way in which we process your personal data. You can contact us as follows:

- By email privacy@ivcevidensia.com
- By post FAO: The Data Protection Officer, Independent Vetcare Limited, The Chocolate Factory, Keynsham, Bristol, BS31 2AU