



Monument Park Veterinary Clinic

PERSONAL INFORMATION PRIVACY POLICY

This policy explains how Monument Park Veterinary Clinic and its subsidiaries ('we', 'us' or 'our') obtain, use and disseminate your personal information. At Monument Park Veterinary Clinic, we are committed to protecting your privacy and ensuring that your personal information is collected and used appropriately, lawfully and transparently. This policy explains how we deal with your personal information and explains your rights, as more fully set out in the Protection of Personal Information Act ('the Act'). This policy is subject to the Act and also any applicable codes of conduct that may be issued by a regulator from time to time.

The following principles are important to us:

- We value the trust that you place in us by giving us your personal information.
- We will always use your personal information in a way that is fair and worthy of that trust.
- You are entitled to clarity on how we use your personal information.
- We will always be transparent about the information we collect, what we do with it, and with whom we share it.
- We will work with you to resolve any concern about how we use your information.
- We will take all reasonable steps to protect your information.
- We will comply with all applicable data protection laws.
- This privacy notice explains:
- Who we are

- Overview
- What personal information we collect
- How we use your personal information
- Our legal basis for using your personal information
- Who we share your personal information with and why
- Retention of your personal information
- How we keep your personal information secure
- Use of cookies
- Your rights
- Transfers of personal information
- How to contact us

This privacy notice sets out rights you may exercise in respect of our use of your personal information. The fundamental rights of which you should be aware of are that you may ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our, or another person's, legitimate interest.

Please read this privacy notice carefully to understand how we handle your personal information before you access or browse our website, or provide your personal information to us.

Who we are

MPV Veterinary Clinic CC trading as Monument Park Veterinary Clinic company registration number 2009/188856/23 is an independent animal veterinary clinic. We protect the health and well-being of your pets, offering a range of services that include: diagnosing and treating sick and injured animals, advising owners on the appropriate pet care, and providing a range of animal health care related products for purchase. For these reasons we consider our lawful basis for processing your personal data to be in your legitimate interest.

Overview

This privacy notice sets out how Monument Park Veterinary Clinic ensures that your personal information is collected and used appropriately, lawfully and transparently. Our business maintains its own policies and processes around the collection and use of the personal information of its clients, and you should refer to our website for more information, alternatively contact us at monumentparkvetclinic@gmail.com

The Monument Park Veterinary Clinic website may contain links to other third party websites. We have no control over how your data is stored, or used by other websites, and cannot be held liable in this regard but as a courtesy we advise you to check the privacy notices of any such websites before providing any data to them.

Our responsibilities

Monument Park Veterinary Clinic is responsible for your personal information in relation to your use of our website and in the normal course of our business with you and/or your status as an employee of Monument Park Veterinary Clinic. Our registered address is 62 Skilpad Road, Monument Park, Pretoria, 0181, South Africa.

We are the data controller of the personal information that we collect from you, and as such we control the way in which your personal information is collected and the purposes for which your personal information is used.

What personal information we collect

We collect personal information directly from you as required by the Veterinary and Para-Veterinary Professions Act (Act 19 of 1982) and the Medicines and Related Substances Control Act (Act 101 of 1965). For example, we ask for personal information at the start of our relationship, and in subsequent communications in order to check your identity. This is a legal requirement and is important to help safeguard you and us against potential crime. We may also

collect information about you from other sources such as external third parties and from cookies on our website. The information is stored manually or electronically, or as a combination of both.

Details of the key categories of personal information we collect are set out below, but please contact us if you would like more detailed information.

Personal information about you will include inter alia the following:

- your name and surname
- your identity or passport number
- your address and email address
- your telephone number(s)
- your language preference to address you in spoken word in language of your choice
- alternative contact name, surname and telephone number
- data provided when you correspond with us
- any updates to data provided to us

The supply of information is voluntary or mandatory per data field and there will be consequences of failing to provide information required by all governing laws. We unfortunately have to reserve the right not to provide you with our services should you fail to provide us with the necessary personal information we require to render our services to you.

In relation to our website

We collect information about how you logged on and off of our website, including your IP address, information about your visit, your device information and how you use our website. This may include the capture of your approximate location information based on the device settings on the device you use to access our website. Please see the Cookies Policy on our website for further information on this.

In relation to our service providers

If you are a supplier to Monument Park Veterinary Clinic (or an employee or other personnel of a supplier), we will hold information in relation to the persons who are engaged in the provision of those services to us, service related data, relationship management data, and other information that you might have provided to us, or which we may have collected from the company's website.

In all cases we will keep your personal information only as long as is necessary for the purpose for which it was collected, or for legal or regulatory reasons. Personal information is securely disposed of when it is no longer required by us to be held.

How we use your personal information

We process your information to provide our products or services to you and to perform our contract with you, to support and maintain our relationship, and to comply with legal obligations. We also use it:

- For internal corporate reporting, audit and record keeping purposes, business administration, ensuring adequate insurance coverage for our business, and to identify and implement business efficiencies.
- To comply with any procedures, laws and regulations which apply to us. This may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others to comply, as well as where we are legally required to do so.
- To disclose your personal information to third parties if we are under a duty to disclose or share such information in order to comply with any legal obligation or to protect our rights.
- To establish, exercise or defend our legal rights. This may include where we reasonably consider it is in our legitimate interests or the legitimate interests of others, as well as where we are legally required to do so.
- To conduct market or customer satisfaction research for statistical analysis and to improve our services and products.
- To provide you with health reminders for the wellbeing of the animal under your guardianship.

- To post information regarding you and/or your pet on our social media platforms with your consent.
- Personal information will not be sold to third parties, provided to direct marketing companies or any other organisations without your permission.

We send our clients the following marketing communications:

- Our newsletter with top tips for animal welfare, exercise and health concerns; and
- Promotions and the latest related product offers.

Clients find these communications useful in administering care to their pets and to keep up to date with what is going on at the clinic. They are only sent to existing clients who can opt out at any time.

The personal data that we process for these communications is first name, surname, address and telephone number. We would like our clients to enjoy these communications, so it is important to note that you can opt-out at any time by:

- Calling our team at the clinic
- Emailing us at monumentparkvetclinic@gmail.com
- Dropping into the clinic and speaking to a member of our team.

In relation to a client's use of our website

When visiting our website we will use your personal information:

- to allow you to access and use our website;
- to provide technical support;
- to provide you with the information that you request from us;
- to ensure the security of our services and our website;
- to store information about your preferences;
- to recognise you when you return to our website;
- for improvement and maintenance of our website.
- Details relating to the usage of our websites by individuals will be anonymised as far as is reasonably possible.

In relation to our service providers use of our website

If you are a supplier to Monument Park Veterinary Clinic (or an employee or other personnel of a supplier), we will use your information to manage and receive the services you provide, and to exercise our rights and obligations in respect of those service (including to confirm and process orders, for administration of accounts, and for tax and payment purposes).

Our legal basis for using your personal information

We can only use your personal information if we have a proper reason for doing so. We consider that the legal basis for using your personal information as set out in this privacy notice are as follows:

- To comply with our legal and regulatory obligations;
- To perform a contract with you or to take steps at your request before entering into a contract with regards to your pets' medical and surgical treatment; and
- To respect your choice if we request your consent for specific processing.
- Our legitimate interests are:
 - To run and manage our business
 - To perform checks (such as identification checks and other verifications) on those we interact with
 - To operate our website
 - To select appropriately skilled and qualified suppliers
 - To make and receive payments
 - For internal administrative purposes

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information.

Who we share your personal information with and why

We share your information with trusted third parties, who perform tasks for us and help us to provide our products and/or services to you, and with other agencies where required by law, court order or regulation. These include:

- A third party to verify your identity or other verification requirements
- Organisations, including the police, where legally obliged to
- Regulatory or governmental agencies
- Our service providers and sub-contractors, including but not limited to payment processors, and suppliers of technical and support services. Analytics and search engine providers that assist us in the improvement and optimisation of our website, including social media tracking pixels that allow platforms such as Facebook, Instagram and Twitter to interact with our website and give us feedback on your actions
- Any third parties with whom we share your personal information is limited (by law and by contract) in their ability to use your personal information for any purpose other than to provide services for us. We will always attempt to ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy notice and applicable laws.

We will also disclose your personal information to third parties:

- Where it is in our legitimate interests to do so to run and manage our business, such as:
- If substantially all of our (or any of its affiliates') assets are acquired by a third party, in which case personal information held by Monument Park Veterinary Clinic will be one of the transferred assets.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity.

- In order to enforce or apply our terms and conditions or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity.
- To protect the rights of the Monument Park Veterinary Clinic Group and our staff or other persons. This may include exchanging personal information with other organisations for the purposes debt collection and credit risk reduction.
- If you would like your pet to be referred to a specialist veterinarian or other pet-related service provider, we will provide them with your pet's clinical history with your name, address, email address and telephone numbers to enable them to confirm your referral appointment.
- Should you wish to move to an alternative veterinary clinic, we will provide your pet's clinical history with your name and address to your new vets before marking your account as inactive.
- Should you wish to microchip your pet we register your name, address and contact number with the microchip provider.
- Should you wish to purchase a pet tag, we will use your name for identification and your contact number.
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Retention of your personal information

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed or as required by law or regulation. The length of time we retain personal information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

How we keep your personal information secure

The main risk of our processing of your personal information is if it is lost, stolen or misused. This could lead to your personal information being in the hands of someone else who may use it fraudulently or make public personal information that you would prefer to keep private.

For this reason, Monument Park Veterinary Clinic is committed to protecting personal data from loss, misuse, disclosure, alteration, unauthorised access, unavailability and destruction and takes all reasonable precautions to safeguard the confidentiality of personal data, including through use of appropriate organisational and technical measures. Organisational measures include physical access controls to our premises, implementing internal policies and staff training and ensuring confidentiality obligations are imposed on our employees and third parties.

Technical measures include requiring passwords for access to our systems, and the use of encryption and anti-virus software. We are committed to ensuring the confidentiality of the personal information that we hold and we continue to review our security controls and related policies and procedures to ensure that your personal information remains secure.

In the course of provision of your personal information to us, your personal information may be transferred over the internet. Although we make every effort to protect the personal information that you provide to us, the transmission of information over the internet is not completely secure. As such, you acknowledge and accept that we cannot guarantee the security of your personal information transmitted to our website and that any such transmission is at your own risk.

We work with third party contractors, some of whom host and operate certain features of our website and digital technologies and infrastructure. The information collected may be stored in, or transferred to, a destination outside of South Africa and/ or may be processed by staff operating outside South Africa. By submitting personal information, you agree to this transfer, storing and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Use of cookies

Our website uses cookies. A cookie is a piece of data stored on your computer's hard drive that identifies your computer while you are using our site.

Cookies have a number of uses, for example, cookies can be used for analytics purposes to estimate the number of users to our website. They may also be used for other purposes, such as to maintain the security of the site and provide information on what we need to do to provide administration support to the website.

We provide specific details about the cookies we use and the reasons for using these cookies in our Cookie Policy to enable website visitors to make an informed decision when using our website. In respect of third party cookies, we have no control over how third party cookies act, or whether that third party uses any other cookies. We advise you to check the privacy notices of any such third parties before providing any data to them.

Your rights

You have the right to ask us:

- For a copy of the personal information we hold about you: You have a right of access to any personal information we hold about you. You can ask us for a copy of your personal information; confirmation whether your personal information is being used by us and details about how and why it is being used.
- To update or correct your personal information: You have a right to request an update to any of your personal information that is out of date or incorrect.
- To delete your information, to the extent permitted by law: You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances.
- To restrict processing of your personal information where appropriate: You have a right to ask us to restrict the way that we process your personal information. To update or correct your personal information
- In certain circumstances, you also have the right to:

- Withdraw your consent for the processing of your personal information: if we are relying on consent and have no other legal grounds for processing your personal information, you can withdraw your consent.
- Object to the processing of your personal information: You have a right to ask us to consider any valid objections which you have to our use of your personal information where we process your personal information on the basis of our or another person's legitimate interest, or where we use your personal information for profiling purposes.
- Object to automated decision making and profiling.
- Data portability: Where we use your personal information on the basis of your consent or performance of a contract, you have a right to ask us to provide your personal information to a third party provider of services.

We will consider all such requests and provide our response within a reasonable period (and in any event within the period allowed by applicable law). Please note, however, that certain personal information may be exempt from such requests in certain circumstances, for example if we need to keep using the information to comply with our own legal obligations or to establish, exercise or defend legal claims.

We may request you provide us with information necessary to confirm your identity before responding to any request you make. If an exception applies, we will tell you this when responding to your request.

Monument Park Veterinary Clinic strives to keep your personal information updated, complete and accurate. It is your duty to provide us with your most up to date personal information and you can do so by providing proof of identity when contacting us at monumentparkvetclinic@gmail.com to update your personal information.

By visiting our website and communicating electronically with Monument Park Veterinary Clinic, you consent to the processing, including transfer of your personal information as set out in this policy.

Transfers of personal information

The personal information we process may be used, stored and/or accessed by staff working for us, other members of the Monument Park Veterinary Clinic or third party partners providing services to us, or performing services on our behalf. Further details on to whom your personal information may be disclosed are set out above.

When we contract with third parties, we attempt to require that they have appropriate security, privacy and confidentiality measures in place to ensure that personal information is kept secure.

If we work with third parties in countries outside the Republic of South Africa, we attempt to ensure that these are countries attempt to have an adequate level of protection for personal information, or the third party receiving the personal information attempts to provide adequate safeguards and agrees to treat your information with the same level of protection as we would and as is required by applicable law.

How to contact us

If you would like any more information about the way we use your information, or if you wish to exercise the rights listed above, please contact us using the details below:

Dr Claire Rossouw

Monument Park Veterinary Clinic Information Officer

Monument Park Veterinary Clinic

62 Skilpad Road, Monument Park, Pretoria, 0181

Telephone number (012) 346 2034

Email: monumentparkvetclinic@gmail.com

You have the right to complain to the Information Regulator (South Africa) if you think that your information has been misused. The contact details are:

JD House

27 Stiemens Street, Braamfontein, Johannesburg, 2001

P.O. Box 31533, Braamfontein, Johannesburg, 2017

Telephone number (010) 023 5207

Complaints email: complaints.IR@justice.gov.za

General enquiries email: inforeg@justice.gov.za

<https://www.justice.gov.za/inforeg/index.html>

Tel: 012 406 4818

Fax: 086 500 3351

Email: inforeg@justice.gov.za

Alternatively, you may seek a remedy via a competent court if you believe your rights have been breached.

Changes to our Privacy Policy

We may change this privacy notice from time to time. We will post any changes on our website.

Please check back frequently to see any updates or changes to our privacy notice. By continuing to use our business and website to interact with, you are confirming that you have read and understood the latest version of our privacy notice.