

Policy	Privacy Notice – Medivet Candidates		
Associated Policies and Documents	Data Protection Policy		
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Version No. Changed	Revision Date	Brief Summary of Changes
1	February 2021	Created for initial review and publication
2	June 2023	Document updated to include process changes and terminology throughout.

Authorisation	Signed
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What is the purpose of this privacy notice?

At Medivet Group Limited ("**Medivet**", "**we**", "**us**", "**our**") we recognise that it is important for you to understand how we use your personal data. Therefore, please read the following information carefully as it contains important information regarding how we use your personal data.

We will only use personal data in ways that are described in this notice and only ways that are consistent with our obligations and your rights under applicable data protection laws.

For the purpose of applicable data protection laws, the data controller (in other words, the organisation that determines how and for what purposes your personal data is used) will be Medivet Group Limited. This is true for all subsidiaries of Medivet Group Limited, veterinary practices operating under the 'Medivet' brand name and other veterinary practices operated by Medivet and trading under a different name.

Please Note: If you are already working for us and apply for a new role within Medivet the way your personal information is handled is covered by our Privacy Notice for Employees.

Data Protection Principles

Medivet will comply with the data protection principles which say that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.

- Kept securely.

The kind of information Medivet may hold about you

In connection with your application with us we may collect, store, and use personal information about you. We typically collect personal information about candidates through the application and recruitment process, either directly from candidates or from third parties including former employers, credit reference agencies, other background check agencies, recruitment agencies, your named referees and some social media platforms such as LinkedIn.

Personal data you provide to us directly.

Ways in which you might provide the data to us

During the application process, you will be required to complete standard forms containing personal information to enable us to process your application. You may also provide personal data in an accompanying CV. We may also collect personal information in the course of interviews and other recruitment-related activities throughout the process.

What type of data might be included?

In connection with your application for employment with us we may collect, store, and use the following categories of personal information about you:

- Personal details such as name, title, date of birth, gender, marital status, dependants, next of kin, emergency contact information;
- Contact details such as addresses, telephone numbers, and personal email addresses;
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter/email or as part of the application process);
- Employment history and qualifications;
- Any information you give to us during any interview or share with us in your CV or cover letter/email;
- CCTV footage and visitor books.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation, disability and medical or health details, but only if and to the extent you wish to share this information with us. We will only ask you to provide these details to ensure that we meet our legal obligations, for example, with respect to our equal opportunities policy.
- County Court Judgment, bankruptcy and insolvency checks.
- Information about criminal convictions and offences or disciplinary actions, but only if and to the extent that the role you are applying for involves certain fiduciary duties or that we are required to do so in accordance with applicable laws.

Why and how does Medivet use your personal data and what is our lawful basis?

We will only use your personal information when the law allows us to. Whenever we process your personal data, we are required to identify and maintain a valid "lawful basis" (i.e. a legally compliant justification) for the processing. To help you to understand what we do with data and why, we have

described the various relevant lawful bases that we rely on in the table below. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.

How and why we use your personal data	What is our legal justification for processing your personal data
We will use your personal data, such as your employment history and qualifications, as an inherent part of our reviewing and screening processes of potential candidates.	By applying for a position at Medivet, you understand and expressly consent to the processing of your personal information in this way by us, whether received from you or from third parties that we contact.
To comply with any relevant laws in relation to your application, such as health and safety or equality laws for example. Checking you are legally entitled to work in the UK.	In some circumstances, we will use your personal data because it's necessary for us to comply with a legal obligation.
To make recruitment decisions about you. Communicating with you about the recruitment process. Carrying out background and reference checks where applicable. Dealing with legal disputes involving you, or other candidates, employees, workers and contractors.	We rely on our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
To prevent unlawful acts and dishonesty, or comply with equality of opportunity or treatment.	In some circumstances, we are obliged to meet a number of regulatory requirements in the public interest or for official purposes. Under such circumstances, the processing must be carried out without consent, broadly because either: consent cannot be obtained, Medivet cannot reasonably be expected to obtain consent, or obtaining consent would prejudice the basis for the public interest reason itself.
To prevent or detect crime, fraud or abuses of our products and services or our Site and to enable third parties to carry out related technical, logistical, research or other functions on our behalf related to these purposes.	In some circumstances we will use your personal data because it's necessary for us to comply with a legal obligation (for example, if we receive a legitimate request from a law enforcement agency). In other cases (such as the detection of theft, fraud or ensuring security of our Site) we will rely on our legitimate interests in keeping our employees and our Site secure and to prevent theft and fraud.
For administrative or business purposes, where you contact us for a particular reason	We have a legitimate interest to respond to your contact for the purposes of administering our business.

How and why we use your personal data	What is our legal justification for processing your personal data
other than those set out above, such as to report problems unrelated to your application.	
<p>We may use CCTV in our practices and Support Centre, for the safety of and prevention of any crimes committed against our staff, our clients, our patients, our suppliers and other visitors, our equipment and our properties, not for other monitoring purposes. If we do so there will always be a notice board to let you know what we're doing.</p>	<p>We have a legitimate interest to ensure the safety of and prevention of any crimes committed against our staff, our clients, our patients, our suppliers and other visitors, our equipment and our properties.</p> <p>In some circumstances we will use your personal data because it's necessary for us to comply with a legal obligation (for example, in the event of any criminal investigations, we may be required by law, to share the data captured with the relevant authorities.).</p>

What if you fail to provide personal information?

Please be aware that if you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of relevant qualifications or work history), we may not be able to process your application successfully.

Change of purpose

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

Your privacy controls

It's really important to us that you are comfortable with the way that we are using your data and you can tell us any time if you'd like to change the way that things are working.

If you wish to discuss our data protection practices, please contact us (using the contact details set out below).

Sharing your data

We may have to share your data with third parties, including third-party service providers and other entities in the group. We require third parties to respect the security of your data and to treat it in accordance with the law.

Sharing your information with third parties and other group entities

We will share your personal information with third parties where required by law. "Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our

group. All our third-party service providers and other entities in the group are required to put in place appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

How do we protect your personal information?

We take the security of your personal information very seriously and have put in place physical, technical, operational and administrative strategies, controls and measures to help protect your personal information from unauthorised access, use or disclosure as required by law and in accordance with accepted good industry practice. We will always keep these under review to make sure that the measures we have implemented remain appropriate. You can obtain further information about these measures from us (using the contact details set below).

In addition, we limit access to your personal information to those employees, partners, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

How long do we keep your personal information?

We will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed. This means your personal data will be erased from our systems when we no longer need it.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you. In this case, we may retain such information for a longer period without further notice to you. In addition, we may be required to retain your personal information for longer periods of time to the extent we are required to do so by law or to protect our legitimate interests (for example, if we are involved in legal or administrative proceedings).

Retention Periods:

- For unsuccessful candidate data – 1 year after the recruitment process has finished.
- For successful candidates – any data collected as part of the recruitment process forms part of your employee record and is subject to the Privacy Notice for Employees.
- CCTV – subject to our CCTV Policy.
- Visitor logs (where applicable) – 6 months from completion of each visitor book.

Your rights in connection with your personal information

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes so that our records can be updated. We cannot be held responsible for any errors in your personal information in this regard unless you have notified us of the relevant change.

Data protection law grants you a number of specific rights in respect of your data in addition to the broad and general right to have your data protected. We have set out some information in respect of each of those specific rights, below:

- **Right to be informed** about how your personal information will be processed. This enables you to receive information about how we use your personal information. We have set this information out in this notice.
- **Request access to your personal information** (commonly known as a "**subject access request**"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information (commonly known as the "**right to be forgotten**"). This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Not to be subject to a decision solely based on automated processing.** We do not anticipate making decisions about you based solely on automated decision making where that decision would have a significant impact on you. If we ever make a decision about you automatically by a computer or an algorithm without human intervention you can ask us to have that decision reviewed by a human.

If you want to exercise any of the rights set out above, please contact us (using the contact details set out below).

Processing your personal information in other territories

Given the international location of some of our employees, clients and suppliers, your personal information may be transferred in and out of the UK and the European Economic Area ("**EEA**") where local laws may not provide legal protection for personal data in the same way as is applicable in the UK or the EEA. We may transfer personal data outside the UK or to an international organisation only on the basis that that country, territory or organisation is designated as having an adequate level of protection, has appropriate safeguards in place to ensure the protection of the data, or that one or more of the derogations recognised by Data Protection Laws for specific situations have been met.

If we feel that we can't ensure the adequate protection of your personal information we will not share your personal information until and unless you have provided us with your explicit consent to do so, after we explained to you the risk of consenting to such transfer of your personal data outside the UK, EEA or territories who are considered to have an adequate level of protection of personal data.

Changes to this privacy notice

We reserve the right to update or amend this privacy notice at any time, including where we intend to further process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. We will issue you with a new privacy notice as soon as practicable when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways from time to time.

Complaints

We encourage you to contact us first if you have any queries, comments or concerns about the way we handle your data (our details are in the section immediately below). We will try to put things right. Please contact our Group Data Protection Officer (see details below) and allow us to handle your request in the best possible way.

However, if you are not satisfied with our handling of any request by you in relation to your rights or concerns, you also have the right to make a complaint to the UK's Information Commissioner's Office ("**ICO**"). You can contact the ICO at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF; 0303 123 1113; or <https://ico.org.uk/>.

Contact

If you have any questions about this privacy notice or how we handle your personal information, you can contact us directly here or by emailing us at mydata@medivet.co.uk. Alternatively, you can contact via post at: Group Data Protection Officer, Medivet Support Centre, First Floor, The Hyde, 38 Clarendon Road, Watford, WD17 1HZ.