

Form	DP04
Edition No.	001
Issue Date	10/03/20
Issued By	J. King

**This document is to be made available to any interested party on request**

This privacy notice explains the reasons for collecting your Personal Data and describes how it is used, kept secure and your rights in relation to it.

## 1. Introduction

The Wales Veterinary Science Centre (WVSC) is committed to protecting personal data and providing a confidential service to its users. Therefore, the WVSC takes the requirements of Data Protection legislation seriously, and any infringement may be considered under the grievance and/or disciplinary procedures. Any information given to the WVSC will be treated with the strictest confidence and only be shared with other organisation or individuals as described in this notice.

The WVSC is registered with the Information Commissioner's Office (ICO). The registration reference is: ZA275196. The current registration can be confirmed here: <https://ico.org.uk/ESDWebPages/Search>.

## 2. Definitions

"Personal Data" is defined in the General Data Protection Regulation (GDPR) as "any information relating to an identified or identifiable natural person ('data subject')".

A "Data subject" is any living individual that specific personal data relates to. Data subjects can be customers (e.g. private vets), suppliers, customers' clients (e.g. farmers / animal keepers), or any other person about whom information is held. It also includes current employees, job applicants and former employees. At WVSC, this may also include members of the public reporting dead wildlife for disease surveillance purposes.

## 3. Legislation

The Data Protection Act 2018 (DPA), the Privacy and Electronic Communications Regulations (PECR) and the General Data Protection Regulation (GDPR) protect Data Subjects' rights. These rights cover the safeguarding of personal data, protection against unlawful processing of personal data and secure movement of personal data.

## 4. Who is the WVSC?

Wales Veterinary Science Centre (WVSC) is the trading name of Aberystwyth Animal Health Laboratory Ltd. (Reg no. 09341813). It is a not-for-profit company set up in 2015 by a consortium of Welsh veterinary practices together with Welsh Lamb and Beef Producers Ltd. (Iechyd Da (Gwledig) Ltd.), working in collaboration with Aberystwyth University.

The WVSC was appointed by the Animal and Plant Health Agency (APHA) as a partner provider to deliver expert post-mortem examinations (PMEs) of new and re-emerging diseases of farm animals, contributing to an enhanced UK-wide scanning surveillance network. The WVSC also supports the veterinary and agricultural sectors further with other diagnostic laboratory testing, advice and training.

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## 5. Identity/contact information of the Data Controller

The WVSC Management Group act as the 'data controller', and as such determine the purpose and way any personal data are processed. This group is responsible for ensuring that any processing activities are performed in compliance with the EU data protection law. Controllers must implement appropriate technical and organisational measures, not only to ensure compliance, but also to demonstrate that measures are in place. This responsibility lies with not only the Management Group, but also employees.

Data controllers Responsibilities:

- Remain up to date and continually review data protection legislation
- Monitor and control what data are collected
- Why these data were collected and whether it is still needed

## 6. Contact details for the Data Protection Officer at WVSC

Data Protection Officer  
Wales Veterinary Science Centre  
Y Buarth  
Aberystwyth  
SY23 1ND  
Tel: 01970 612 374  
Email: [enquiries@wvsc.wales](mailto:enquiries@wvsc.wales)

## 7. Purpose of processing

The WVSC processes personal data in order to:

- a) Recruit, support and manage staff, agents and volunteers
- b) Maintain accounts and records
- c) Share relevant information with Government for the purposes of surveillance
- d) Share relevant information with diseases testing programme coordinators and/or delivery partners (e.g. Gwaredu BVD, Iechyd Da and Menter a Busnes)
- e) Respond effectively to enquirers and handle any complaints
- f) Promote services by maintaining a list of individuals who have expressed a desire to be kept up to date with WVSC activities (e.g. CPD or newsletter distribution lists)

## 8. How are personal data collected?

Personal data are collected on submission forms, correspondence via email and telephone, social media and other software applications. Veterinary surgeons will give details of farmers when submitting carcasses for postmortem examination and for postmortem carcass collection.

We also use cookies and similar technologies to track the activity on our website and we hold certain information. You can instruct your browser to refuse all cookies or to indicate when a

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cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. Further information on Cookies can be found on our websites.

## 9. Examples of Personal Data

The WVSC processes personal data which may include:

- Names and addresses of staff, customers, visitors and subcontractors
- Contact information (telephone numbers/email addresses)
- Financial details (including bank details)
- Photos of individuals (staff) or submission samples
- Farmer details (name, address, holding number, type of enterprise and other information relevant to disease investigation)
- Salary, tax and pension details of staff
- Health and safety reports
- Sickness records and medical information
- CV's and job applications
- Holiday request and disciplinary procedures

## 10. Data Storage

The WVSC uses appropriate measures to keep personal data secure at all points of the processing. Keeping data secure includes protecting it from unauthorised or unlawful processing, or from accidental loss, destruction or damage. Security measures are in place which provide a level of security which is appropriate to the risks involved in the processing.

Where personal details are retained for the purposes of contacting individuals (e.g. address books such as Outlook®, email distribution lists and phone lists) then these documents shall be live. If an individual requires their names to be removed from the list, then they shall be moved promptly. Any personal details associated with other records will be filed.

## 11. Legal basis for processing

Processing of personal data will only be fair and lawful when the purpose for the processing meets a legal basis, as listed below, and when the processing is transparent. This means that the WVSC will provide an explanation of how and why personal data are processed, at the point the data are collected.

Processing of personal data is only lawful if at least one of these legal conditions, as listed in Article 6 of the GDPR, is met:

- a) the processing is necessary for a contract with the data subject;
- b) the processing is necessary for us to comply with a legal obligation;
- c) the processing is necessary to protect someone's life ("vital interests");
- d) the processing is necessary for us to perform a task in the public interest, and the task has a clear basis in law;

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- e) the processing is necessary for legitimate interests pursued by the WVSC or another organisation, unless these are overridden by the interests, rights and freedoms of the data subject.
- f) As a legitimate interest to inform Government in disease surveillance or where notifiable disease is suspected (legal obligation).
- g) When consent has been given to keep you up to date with our activities (e.g. CPD, newsletters, new services)
- h) Legal obligation for finances including payroll, VAT and billing
- i) If none of the other legal conditions apply, the processing will only be lawful if the data subject has given their clear consent.

Where none of the other legal conditions apply (above) to the processing, and WVSC is required to get consent from the data subject, the WVSC will clearly set out what data are being asked for, including why it is being collected, details of the data and how it will be used. Consent will be specific to each process WVSC is requesting consent for, and consent will only be asked for when the data subject has a real choice about whether to provide their data. Consent can, however, be withdrawn at any time and if withdrawn, the processing will stop.

WVSC will only process, collect and use personal data for the specific purposes explained above, or for other purposes specifically permitted by law. WVSC will explain those other purposes to data subjects unless there are lawful reasons for not doing so.

## **12. List of who might access the data, particularly if third parties**

Surveillance data may be shared with Government (Welsh Government and APHA). Diagnostic and surveillance lab reports containing personal information will be reported to private veterinary surgeons named by the farmer/animal keeper or submitting samples on behalf of the farmer/animal keeper.

Data may be transferred to delivery partners (e.g. Menter a Busnes and Iechyd Da (Gweldig) Ltd.) or eradication programmes/schemes as notified on submission forms. Other non-governmental labs subcontracted to test samples from WVSC will be submitted with limited personal data, only sufficient to identify the samples.

WVSC will ensure, where possible, that it only uses the services of Data Processors/Contractors who adhere to the legislation and be committed to protecting personal data and providing a confidential service. WVSC data processors / contractors could include payroll services, other laboratories and IT Services.

**No personal data is expected to be shared internationally.**

## **13. Data Retention Policy**

The WVSC will not keep personal data longer than is necessary for the purposes for which it was collected. The WVSC will comply with official guidance issued to our sector about retention periods for specific records.

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Data stored electronically will be retained for at least ten years. Any records stored in hard copy will be retained for at least seven years (unless scanned and saved electronically). Any records which are not retained will be disposed of in a secure and confidential manner.

#### 14. A note of the rights of the data subjects

As a data subject with the WVSC, you have the right to:

- a) request access to any of your personal data held by us.
- b) ask to have inaccurate personal data changed.
- c) restrict processing, in certain circumstances.
- d) object to processing, in certain circumstances, including preventing the use of your data for direct marketing.
- e) data portability, which means to receive your data, or some of your data, in a format that can be easily used by another person (including the data subject themselves) or organisation;
- f) not be subject to automated decisions, in certain circumstances; and
- g) withdraw consent when WVSC relies on consent to process your data.

The WVSC will act on all valid requests as soon as possible, and at the latest within one calendar month, unless we have reason to, and can lawfully extend the timescale. This can be extended by up to two months in some circumstances.

All responses to data subjects' rights being exercised, as above, are provided free of charge.

Any information provided to data subjects will be concise and transparent, using clear and plain language

#### 15. The right to lodge a complaint

If you are not satisfied with our use of your Personal Data or our response to any request by you to exercise any of your rights, or if you think we have breached the Data Protection Act 2018, you have the right to complain to the ICO, details below.

Information Commissioner's Office (Wales)  
2nd Floor  
Churchill House  
Churchill Way  
Cardiff  
CF10 2HH  
Tel: 01625 545297  
Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

#### 16. Changes to this Notice

This notice is subject to review and updated as necessary.