

# Privacy Statement

Updated: 16<sup>th</sup> May 2017

## 1. Introduction

- 1.1. In doing business, we process personal data belonging to our customers, users, suppliers and prospective customers. We have designed our business to be compliant with the requirements of the Data Protection Acts 1988 and 2003 (as amended) and we have designed our services so that we will be able to comply with the requirements of the General Data Protection Regulation when it comes into effect on 25 May 2018.
- 1.2. VirtualVet makes available via the internet its platform (the "VirtualVet Platform") tools to assist in recording all on-farm animal treatments, including herd health records and disease recording (our "Services"). When you sign up to use the VirtualVet Platform, you will be provided with separate terms that detail how we process information through the Platform.
- 1.3. This privacy policy relates to the information collected from our website visitors and received by email, information we collect through our marketing and recruitment activities and information we receive from our suppliers. It does not relate to personal data processed through the VirtualVet Platform.
- 1.4. By using our website and agreeing to this privacy statement and cookie policy, you consent to the processing of your personal data and our use of cookies in accordance with these terms.

## 2. Collecting personal information

- 2.1. We may collect, store and use the following kinds of personal information:
  - 2.1.1. information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
  - 2.1.2. information that you provide to us when interacting with our website (including your email address) and details of any request;
  - 2.1.3. information that you provide to us to subscribe to our email notifications and/or newsletters (including your name and email address);
  - 2.1.4. information contained in or relating to any communication that you send to us or send through our website or by email or other communications platform, excluding the VirtualVet Platform (including the communication content and metadata associated with the communication);
  - 2.1.5. information collected by VirtualVet representatives from representatives of customers and potential customers on VirtualVet's behalf in the course of providing or marketing our service such as basic contact information;

- 2.1.6.information collected by VirtualVet in its recruitment activities;
- 2.1.7.information that suppliers provide to us in the course of their and our business activities; and
- 2.1.8.any other personal information that you choose to send to us.
- 2.2. Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.
- 2.3. VirtualVet is responsible for the use and processing of personal data collected as described in Section 2.1 above as a 'data controller'. VirtualVet owns this data.
- 2.4. Where you subscribe to our Services, we may act as a 'data processor' on your behalf, with respect to your data. Some of this data may include personal data but we are not the data controller for this data. Please see the relevant terms of service for more information on how we process data through the Services and on the VirtualVet Platform.

### **3. Using personal information**

- 3.1. Personal information submitted to us outside of the VirtualVet Platform will be used for the purposes specified in this policy or on the relevant pages of the website.
- 3.2. We may use your personal information to:
  - 3.2.1.administer our website and business;
  - 3.2.2.personalise our website for you;
  - 3.2.3.enable your use of the services available on our website;
  - 3.2.4.send you non-marketing commercial communications;
  - 3.2.5.send you email notifications that you have specifically requested;
  - 3.2.6.provide you with support relating to the Services;
  - 3.2.7.send you marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
  - 3.2.8. carry out our recruitment activities;
  - 3.2.9.liaise with our suppliers;
  - 3.2.10. provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
  - 3.2.11. deal with enquiries and complaints made by or about you relating to our website or our Services;
  - 3.2.12. keep our website secure and prevent fraud; and
  - 3.2.13. verify compliance with the terms and conditions governing the use of our website.

3.3. We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

#### **4. Disclosing personal information**

4.1. We may disclose your personal information where it is collected through this website to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors where reasonably necessary for the purposes set out in this policy.

4.2. We may disclose your personal information:

4.2.1. to the extent that we are required to do so by law;

4.2.2. in connection with any ongoing or prospective legal proceedings;

4.2.3. in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); and

4.2.4. to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling.

4.3. Except as provided in this policy, we will not provide your personal information to third parties.

#### **5. International data transfers**

5.1. We have designed our Platform and Services so that information is stored and hosted in the European Economic Area or third countries that are deemed to have an 'adequate level of protection' for personal data as that term is understood under Directive 95/46/EC (the Data Protection Directive).

5.2. We also have taken great efforts to design our internal systems so that the information specified in clause 2 above is also stored within the European Economic Area or countries deemed to have an 'adequate level of protection'. Due to the nature of email and similar communications services, however, we cannot guarantee that personal data sent by such services will remain within the EEA or in countries with an 'adequate level of protection' as this will depend on many factors including your email provider. We have, however, chosen suppliers that host and store data within the European Economic Area to minimize the possibility of transfers outside the European Economic Area.

5.3. You expressly agree to the transfers of personal information described in this Section 5.

#### **6. Retaining personal information**

6.1. Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.2. Notwithstanding the other provisions of this Section 6, we will retain documents (including electronic documents) containing personal data:

6.2.1. to the extent that we are required to do so by law;

6.2.2. if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and

6.2.3. in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## **7. Security of personal information**

- 7.1. We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.
- 7.2. We will store the personal information you provide through our Platform on our secure (password- and firewall-protected) servers.
- 7.3. You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

## **8. Amendments**

- 8.1. We may update this policy from time to time by publishing a new version on our website. Changes take effect 15 days after they are posted to our website, unless you are a new user, in which case they take effect immediately.
- 8.2. You should check this page occasionally to ensure you are happy with any changes to this policy.
- 8.3. We may notify you of changes to this policy by email.

## **9. Your rights**

- 9.1. You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
  - 9.1.1. the payment of a fee (currently fixed at EUR 6.35); and
  - 9.1.2. the supply of appropriate evidence of your identity.
- 9.2. We may withhold personal information that you request to the extent permitted by law.
- 9.3. You may instruct us at any time not to process your personal information for marketing purposes.
- 9.4. In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## **10. Third party websites**

- 10.1. Our website may include hyperlinks to, and details of, third party websites.
- 10.2. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **11. Cookies**

- 11.1. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 11.2. Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date,

unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

11.3. Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

11.4. Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

## 12. Our cookies

12.1. On our Platform and Services we use session cookies, authentication cookies, and security cookies cookies.

12.2. The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

12.3. we use JetPack for Wordpress to recognise a computer when a user visits our website and track users as they navigate the website, improve the website's usability and administer the website.

## 13. Analytics cookies

13.1. We use JetPack for Wordpress to analyse the use of our website.

13.2. Our analytics service provider generates statistical and other information about website use by means of cookies.

13.3. The analytics cookies used by our website have the following names: *cookietest*, *akm\_mobile*, *stnojs*, *jetpack\_sso\_remember\_me*, *jetpack\_sso\_redirect\_to* , *ab*.

13.4. The information generated relating to our website is used to create reports about the use of our website.

13.5. Our analytics service provider's privacy policy is available at <https://automatic.com/privacy/>.

## 14. Blocking cookies

14.1. Most browsers allow you to refuse to accept cookies; for example:

14.1.1. in Firefox (version 50) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and

14.1.2. in Chrome (version 55), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

14.2. Blocking all cookies will have a negative impact upon the usability of many websites.

14.3. If you block cookies, you will not be able to use all the features on our website.

## 15. Deleting cookies

- 15.1. You can delete cookies already stored on your computer; for example:
- 15.2. in Firefox (version 50), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and
- 15.3. in Chrome (version 55), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".
- 15.4. Deleting cookies will have a negative impact on the usability of many websites.

## **16. Updating information**

- 16.1. Please let us know if the personal information that we hold about you needs to be corrected or updated.

## **17. Our details**

- 17.1. This website is owned and operated by Animal Disease Tracking Ireland Limited, trading as VirtualVet.
- 17.2. We are registered in Ireland, with company registration number 602502 and registered office at Grenan Upper, Kilmacthomas, County Waterford.
- 17.3. You can contact us:
  - 17.3.1. by post, using the postal address given above;
  - 17.3.2. by telephone, on the contact number published on our website from time to time;  
or
  - 17.3.3. by email, using the email address published on our website from time to time.