

## MWI Animal Health - Privacy Policy

### Overview – the key information you should be aware of

(A) **Who we are:** We are MWI Animal Health, one of the UK's leading veterinary wholesalers, based in England. MWI Animal Health is a trading name of Centaur Services Limited, and if you need it, our company number is 00787385 and our registered office is at Centaur House, Torbay Road, Castle Cary, United Kingdom BA7 7EU. MWI Animal Health is the controller of your personal information, and is responsible for your personal information. All references in this policy to "MWI Animal Health", "our", "us" or "we" refer to MWI Animal Health. All references in this policy to "our website" refer to the website owned by MWI Animal Health at [www.mwiah.co.uk](http://www.mwiah.co.uk).

(B) **Our values and what this policy is for:** We value your privacy and want to be accountable and fair to you as well as transparent with you in the way that we collect and use your personal information. We also want you to know your rights in relation to your information which you can find further down the page (E).

In line with these values, this privacy policy tells you what to expect when we collect and use personal information about you. We have tried to make it easy for you to navigate so you can find the information that is most relevant to you and our relationship with you.

We are always looking to improve the information we provide to our customers and contacts so if you have any feedback on this privacy policy, please let us know using our contact details in section 12.

(C) **Who this policy applies to:** This policy applies to:

1. Visitors to our website;
2. Customers, employees of our customers, and pet owners who use our customers' services;
3. Prospective customers (to whom we send marketing communications);
4. People who contact us with enquiries; and
5. Our suppliers, and employees of our suppliers.

Depending on our relationship, we will collect and use your information in different ways. Please click on the links above to find out the information that we collect about you and how we use this information.

(D) **What this policy contains:** This privacy policy describes the following important topics relating to your information (you can click on the links to find out more):

1. How we obtain your personal information;
2. Collection of your personal information and how we use it;
3. Our legal basis for using your personal information;

4. How and why we share your personal information with others;
5. How long we store your personal information;
6. Your rights;
7. Children;
8. Marketing;
9. Where we may transfer your personal information;
10. Risks and how we keep your personal information secure;
11. Links to other websites;
12. Changes to this privacy policy; and
13. Further questions and how to make a complaint.

(E) **Your rights to object:** You have various rights in respect of our use of your personal information as set out in section 6. Two of the fundamental rights to be aware of are that:

1. You may ask us to stop using your personal information for direct marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.
2. 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.

You can find out more information in section 6.

(F) **What you need to do and your confirmation to us:** Please read this privacy policy carefully to understand how we handle your personal information. By engaging with us in the ways set out in this privacy policy, you confirm that you have read and understood the entirety of this privacy policy, as it applies to you.

## **The detail – the key information you should be aware of**

### **1. How we obtain your personal information**

- 1.1 You may provide us with your personal information voluntarily. We may also receive information about you from third parties such as our suppliers, our group companies, public websites and public agencies, which we refer to as "third party sources" or "suppliers" throughout this policy.
- 1.2 You may give us personal information about yourself by using the online forms provided on our website, by setting up an account for your employer on our website, when using bulletin boards or forums on our website, by uploading an order or prescription via our website, or by contacting us by phone, email or other means or at a trade or vet show or similar event. This includes, for example, where you provide your personal information to us in order to receive products, deliveries, information or services from

us. If you are a supplier, you may also give us personal information about you when you are offering or providing services to us.

## 2. **Collection of your personal information and how we use it**

Please go to the section or sections below that best describes our relationship with you to find out the information that we collect about you and how we use this information. We refer to this as "personal information" throughout this policy.

### 2.1 **Visitors to our website**

#### (a) What personal information we collect about you

We, or third parties on our behalf, will collect and use any of the following information about you:

- (i) your name including your title;
- (ii) your postal address;
- (iii) your email address;
- (iv) your telephone number;
- (v) information provided when you correspond with us;
- (vi) any updates to information provided to us;
- (vii) personal information we collect about you or that we obtain from our third party sources;
- (viii) the following information created and recorded automatically when you visit our website:

(A) **Technical information.** This includes: the Internet Protocol (IP) address used to connect your computer to the internet address; the website address and country from which you access information; the files requested; browser type and version; browser plug-in types and versions; operating system; and platform. We use this personal information to administer our website, to measure the efficiency of our systems and to undertake an analysis on the locations from which people access our webpages; and

(B) **Information about your visit and your behaviour on our website** (for example, the pages that you click on). This may include the website you visit before and after visiting our website (including date and time), time and length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, traffic data, location data, weblogs and other communication data and information provided when requesting further service or downloads.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to allow you to access, use, and place orders via, our website;
- (ii) to allow you to access, use, and place orders via, white-labelled websites which we operate;
- (iii) to receive enquiries from you through the website;
- (iv) for improvement and maintenance of our website and to provide technical support for our website;
- (v) to ensure the security of our website;
- (vi) to recognise you when you return to our website, to store information about your preferences, and to allow us to customise the website for you; and
- (vii) to evaluate your visit to the website and prepare reports or compile statistics to understand the type of people who use our website, how they use our website and to make our website more intuitive. Such details will be anonymised as far as reasonably possible and you will not be identifiable from the information collected.

Please see sections 2.6 and 2.7 for more details about how we use your personal information.

(c) Cookies

- (i) Some pages on our website use cookies, which are small files placed on your internet browser when you visit our website. We use cookies in order to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.
- (ii) Where we use cookies on our website, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website or to use all the functionality provided through our website.
- (iii) For detailed information on the cookies we use and the purposes for which we use them, please refer to our Cookies Policy.

**2.2 Customers, employees of our customers, and pet owners who use our customers' services**

(a) What personal information we collect about you

We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your name including your title;
- (ii) your postal address;
- (iii) your email address;
- (iv) your telephone number;
- (v) information provided when you correspond with us;
- (vi) any updates to information provided to us;
- (vii) information needed to provide products and services to you (including order details, order history and payment details, customer services information, and customer relationship management information);
- (viii) information provided by pet owners in respect of their pets, such as the name, date of birth, and treatment received by their pet(s);
- (ix) CCTV recordings if you visit one of our sites.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to facilitate deliveries of products and services ordered by you;
- (ii) to deal with any enquiries or issues you have about our products and services;
- (iii) to send you certain communications (including by email or post) about our products and services such as administrative messages;
- (iv) to ensure your safety and security and that of others by the use of CCTV;
- (v) to carry out statistical analysis and market research on practices who may be interested in our products and services;
- (vi) if it is in our legitimate interests for business development and marketing purposes, and subject to section 2.2(b)(vii) directly below, to contact you by telephone, post or email with information about our products and services or the products and services of our suppliers which either you request, or which we feel will be of interest to you; and
- (vii) if you are a sole trader or a non-limited liability partnership and you have consented, to contact you by email with information about our products and services or the products and services of our suppliers which either you request, or which we feel will be of interest to you.

Please see sections 2.6 and 2.7 for more details about how we use your personal information.

- (c) Special categories of data. We do not collect any special categories of data.

### 2.3 **Prospective customers (to whom we send marketing communications)**

- (a) We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your name including your title;
- (ii) your postal address;
- (iii) your email address;
- (iv) your telephone number.

- (b) How we use your personal information

We will collect, use and store the personal information listed above, if you have consented or, otherwise, if it is in our legitimate interests, for business development and marketing purposes, to contact you (including by telephone, email or post) with information about our products and services, or the products and services of our suppliers, which either you request, or which we feel will be of interest to you (including newsletters).

Please see sections 2.6 and 2.7 for more details about how we use your personal information.

### 2.4 **People who contact us with enquiries**

- (a) We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your name including your title;
- (ii) your postal address;
- (iii) your email address;
- (iv) your telephone number;
- (v) information provided when you correspond with us;
- (vi) any updates to information provided to us.

- (b) How we use your personal information

We will collect, use and store the personal information listed above to deal with any enquiries or issues you have about our products and services, or our business, including any questions you may have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we

may process your personal information for these purposes where it is in our legitimate interests for customer services purposes.

Please see sections 2.6 and 2.7 for more details about how we use your personal information.

## 2.5 **Our suppliers, and employees of our suppliers**

(a) We, or third parties on our behalf, may collect and use any of the following information about you:

- (i) your name including your title;
- (ii) work contact information (phone number, postal address, mailing address, email address);
- (iii) your job title;
- (iv) information provided when you correspond with us;
- (v) any updates to information provided to us;
- (vi) personal information we collect about you from third party sources;
- (vii) if you attend our sites, CCTV recordings.

(b) How we use your personal information

We will collect, use and store the personal information listed above for the following reasons:

- (i) to enable us to purchase and receive products and services from you (including supplier due diligence, payment and expense reporting and financial audits);
- (ii) to deal with enquiries from you;
- (iii) for security vetting and criminal records checks (where applicable and allowed by law); and
- (iv) for CCTV monitoring and other security of our depots and facilities.

Please see sections 2.6 and 2.7 for more details about how we use your personal information.

(c) Source of personal information. We may receive some of your personal information from third party sources, such as your employer or your employer's company website. We may also collect this personal information from publicly-available sources, such as LinkedIn.

(d) Special categories of data. We do not collect any special categories of data.

2.6 Whatever our relationship with you is, we may also collect, use and store your personal information for the following additional reasons:

- (a) to deal with any enquiries or issues you have about how we collect, store and use your personal information, or any requests made by you for a copy of the information we hold about you. If we do not have a contract with you, we may process your personal information for these purposes where it is in our legitimate interests for customer services purposes;
- (b) for internal corporate reporting, business administration, ensuring adequate insurance coverage for our business, ensuring the security of our depots and facilities, and to identify and implement business efficiencies. We may process your personal information for these purposes where it is in our legitimate interests to do so;
- (c) 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;
- (d) 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.

## 2.7 Further processing

We will not use your personal information in any way that is incompatible with the purposes set out in this section 2. Please contact us using the details in section 12 if you want further information on the analysis we will undertake to establish if a new use of your personal information is compatible with these purposes.

## 3. **Legal basis for use of your personal information**

### 3.1 We consider that the legal bases for using your personal information as set out in this privacy policy are as follows:

- (a) our use of your personal information is necessary to perform our obligations under any contract with you (for example, to fulfil an order which you place with us, or to comply with the terms of use of our website which you accept by browsing our website); or
- (b) our use of your personal information is necessary for complying with our legal obligations (for example, for health and safety purposes); or
- (c) where neither (a) nor (b) apply, use of your personal information is necessary for our legitimate interests or the legitimate interests of others (for example, to ensure the security of our website). Our legitimate interests are to:
  - (i) run, grow and develop our business (as well as the businesses of our group companies Vetspace Limited and St Francis Limited);
  - (ii) operate our website;
  - (iii) carry out marketing, market research and business development;
  - (iv) place, track and ensure fulfilment of orders with our suppliers;



- (v) receive, track, and ensure fulfilment and delivery of orders to our customers, and make and receive payment and provide customer services; and
- (vi) for internal group 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. You can ask us for information on this balancing test by using the contact details at section 12.

- 3.2 We may process your personal information in some cases for marketing purposes on the basis of your consent (which you may withdraw at any time after giving it, as described below).
- 3.3 If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at [privacy@mwiah.co.uk](mailto:privacy@mwiah.co.uk) and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to be able to provide products and services to you (for example, we may not be able to provide marketing information to you regarding our suppliers' products and services).

#### 4. **How and why we share your personal information with others**

- 4.1 We may share your personal information with our group companies where it is in our legitimate interests to do so for internal administrative purposes (for example, for corporate strategy, compliance, auditing and monitoring, and quality assurance).
- 4.2 We will also share your personal information with the following group companies for the following specified purposes:
  - (a) with Vetspace Limited, to enable Vetspace Limited to market (by email, telephone or post) its practice management software and other services to you or your employer; and
  - (b) with St Francis Limited, to enable St Francis Limited to market (by email, telephone or post) its buying group services to you or your employer.
- 4.3 We will share your personal information with the following third parties or categories of third parties:
  - (a) we may share statistical information with our suppliers to demonstrate what interest there has been in any marketing campaigns we have assisted our suppliers in carrying out;
  - (b) the business details which you provide to us may contain personal information that we share with our suppliers, for example, if your name is also the name of your business and your home address is also the address of your business. We share the name and address of our customers, together with the types and amounts of products each customer purchases, with our suppliers who will use this information to calculate rebates, analyse statistical information on

purchases of their products, and contact you to provide guidance on how you should advertise and market the purchased products. Our suppliers may also contact you directly for marketing and sales purposes but they are required by law to ensure they have obtained the requisite permissions, consents and/or other legal requirements if they wish to use your personal information for these purposes;

- (c) our other service providers and sub-contractors, including payment processors, utility providers, suppliers of technical and support services, and insurers;
- (d) companies that assist in our marketing, advertising and promotional activities such as the marketing automation platform MailChimp;
- (e) analytics and search engine providers that assist us in the improvement and optimisation of our website.

4.4 Any third parties with whom we share your personal information are limited (by law and by contract) in their ability to use your personal information. We will always ensure that any third parties with whom we share your personal information are subject to privacy and security obligations consistent with this privacy policy and applicable laws.

4.5 We will also disclose your personal information to third parties:

- (a) where it is in our legitimate interests to do so to run, grow and develop our business:
  - (i) if we sell or buy any business or assets, we may disclose your personal information to the prospective seller or buyer of such business or assets;
  - (ii) if substantially all of our or any of our affiliates' assets are acquired by a third party, in which case personal information held by us will be one of the transferred assets;
- (b) 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;
- (c) in order to enforce or apply our terms of use, our terms and conditions for customers 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; or
- (d) to protect the rights, property, or safety of MWI Animal Health, our staff, our customers or other persons. This may include exchanging personal information with other organisations for the purposes of fraud protection.

4.6 We may also disclose and use anonymised, aggregated reporting and statistics about users of our website or our goods and services for the purpose of internal reporting or reporting to our group or other third parties, and for our marketing and promotion purposes. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.

4.7 Save as expressly detailed above, we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, you should contact us and we will stop doing so.

## 5. **How long we store your personal information**

We keep your personal information for no longer than necessary for the purposes for which the personal information is processed. The length of time for which we retain personal information 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.

## 6. **Your rights**

6.1 You have certain rights in relation to your personal information. In order to exercise any of the following rights, please complete the data subject access request form [here](#) or email the privacy office at [privacy@mwiah.co.uk](mailto:privacy@mwiah.co.uk) at any time.

(a) **Right of access.** 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 as to whether your personal information is being used by us; details about how and why it is being used; and details of the safeguards which in place if we transfer your information outside of the United Kingdom or the European Economic Area ("EEA").

(b) **Right to update your information.** You have a right to request an update to any of your personal information which is out of date or incorrect.

(c) **Right delete your information.** You have a right to ask us to delete any personal information which we are holding about you in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in section 12.

We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are, using the contact details in section 12.

(d) **Right to restrict use of your information:** You have a right to ask us to restrict the way that we process your personal information in certain specific circumstances. You can ask us for further information on these specific circumstances by contacting us using the details in section 12.

We will pass your request onto other recipients of your personal information unless that is impossible or involves disproportionate effort. You can ask us who the recipients are using the contact details in section 12.

(e) **Right to stop marketing:** You have a right to ask us to stop using your personal information for direct marketing purposes. If you exercise this right, we will stop using your personal information for this purpose.

- (f) **Right to data portability:** You have a right to ask us to provide your personal information to a third party provider of services.

This right only applies where we use your personal information on the basis of your consent or performance of a contract; and where our use of your information is carried out by automated means.

- (g) **Right to object.** 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.

6.2 We will consider all such requests and provide our response within a reasonable period (and in any event within one month of your request unless we tell you we are entitled to a longer period under 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.

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

## 7. **Children**

7.1 You must be aged 18 or over to purchase products or services from us. Our website and services are not directed at children and we do not knowingly collect any personal information from children.

7.2 If you are a child and we learn that we have inadvertently obtained personal information from you from our websites, or from any other source, then we will delete that information as soon as possible.

7.3 Please contact us at [privacy@mwiah.co.uk](mailto:privacy@mwiah.co.uk) if you are aware that we may have inadvertently collected personal information from a child.

## 8. **Marketing**

8.1 We may collect and use your personal information for undertaking marketing by email, telephone and post. If you are a customer, or an employee of a customer, or a prospective customer we may send you certain marketing communications as set out in section 2.2(b) and section 2.3.

8.2 We will always obtain your consent to direct marketing communications where we are required to do so by law and if we intend to disclose your personal information to any third party for such marketing.

8.3 If you wish to stop receiving marketing communications, you can contact us by email at [privacy@mwiah.co.uk](mailto:privacy@mwiah.co.uk).

## 9. **Where we may transfer your personal information**

We will not transfer your personal information outside of the United Kingdom.

## 10. **Risks and how we keep your personal information secure**

- 10.1 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, information that you would prefer to keep private.
- 10.2 For this reason, MWI Animal Health is committed to protecting your personal information from loss, theft and misuse. We take all reasonable precautions to safeguard the confidentiality of your personal information, including through use of appropriate organisational and technical measures such as physical access controls to premises, staff training, using passwords for systems access, and using anti-virus software.
- 10.3 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 which 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. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorised access to it.
- 10.4 Where we have given you (or where you have chosen) a password which enables you to access your online account, you are responsible for keeping this password confidential.

## 11. **Links to other websites**

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of such third-party websites or any association with their operators. This privacy policy only applies to the personal information that we collect or which we receive from third party sources, and we cannot be responsible for personal information about you that is collected and stored by third parties. Third party websites have their own terms and conditions and privacy policies, and you should read these carefully before you submit any personal information to these websites. We do not endorse or otherwise accept any responsibility or liability for the content of such third party websites or third party terms and conditions or policies.

## 12. **Changes to our privacy policy**

We may update our privacy policy from time to time. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by post or email. Please check back frequently to see any updates or changes to our privacy policy.

## 13. **Further questions and how to make a complaint**

- 13.1 If you have any queries or complaints about our collection, use or storage of your personal information, or if you wish to exercise any of your rights in relation to your personal information, please contact our Data Protection Co-ordinator at

[privacy@mviah.co.uk](mailto:privacy@mviah.co.uk). We will investigate and attempt to resolve any such complaint or dispute regarding the use or disclosure of your personal information.

- 13.2 In accordance with Article 77 of the General Data Protection Regulation, you may also make a complaint to the Information Commissioner's Office, or the data protection regulator in the country where you usually live or work, or where an alleged infringement of the General Data Protection Regulation has taken place. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

The practices described in this privacy policy statement are current as of 13 February 2019.