



1. Introduction

We appreciate the trust you place in us when sharing your personal data. The security of that data is very important to us. In this document, we will explain how we collect, use and protect your personal data.

We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

2. Who we are

Teleos Systems Limited is the author of your Veterinary Practice Management Software. We act as a data processor for your Practice.

Our offices are located at:-

319 Fort Dunlop, Fort Parkway, Birmingham B24 9FD and

Cambrian House, 52 East Street, St Neots, Cambridgeshire PE19 1JU

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at GDPR@teleosvet.co.uk

3. Collection of personal data

We collect personal data from you for one or more of the following purposes:

- 1. To provide on-going technical support services to ensure that your Teleos software functions efficiently for your Practice;
- 2. To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services;
- 3. To fulfil a contract that we have entered into with you or with the entity that you represent;
- 4. To manage any communication between you and us via our support ticketing system, email communication and accounts software;
- 5. To convert client data to Teleos format where you have changed your Practice Management System.

The table in Section 5 below provides more detail about the data that we collect for each of these purposes, the lawful basis for doing so, and the period for which we will retain each type of data.

Technical information

In addition, and in order to ensure secure remote connections to your systems, we collect the following:

- Technical information, including the Internet Protocol (IP) address used to connect your devices to the Internet;
- Operating system and platform;
- Information about your interactions with Teleos Support and accounts staff.

In Section 7 below, we identify your rights in respect of the personal data that we collect and describe how you can exercise those rights.

4. Lawful basis for the processing of personal data

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. Our business architecture, accounting and systems infrastructure and compliance organisation means that all personal data is processed on common, Group-wide platforms. We have processes in place to make sure that only those people in our organisation who need to access your data can do so. A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties and, where this happens, this is also identified below.

When we process on the lawful basis of legitimate interest, we apply the following test to determine whether it is appropriate:

The purpose test – is there a legitimate interest behind the processing?

Necessity test – is the processing necessary for that purpose?

Balancing test – is the legitimate interest overridden, or not, by the individual's interests, rights or freedoms?

Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
1. To provide you with ongoing software support	Subject matter information	Name, company name, address, email address telephone numbers.	To provide appropriate online or email information and advice on the use of Teleos software.	Contractual fulfilment	Internally only	Indefinitely whilst the ongoing support contract is in operation, or maximum of 8 years after the contract has ceased.
			To provide further, related, online or email information and ongoing news updates in relation to the use of Teleos	Legitimate interest	Internally only except for instances when you have expressed an interest in 3 rd party	

			software and other 3 rd relevant party products that may be of interest.		products or services and given your permission	
2. Transactional information	Transaction details	Name, physical address, email address, telephone number, other medium of content delivery	<p>To process purchase transactions for products and services with clients, and to ensure any transaction issues can be dealt with.</p> <p>For accounting and taxation purposes</p> <p>Documentation should any contractual legal claim arise</p>	<p>Contractual performance</p> <p>Statutory obligation</p> <p>Legitimate Interest</p>	<p>Internally only</p> <p>Internally and professional advisers</p> <p>Internally and professional advisers</p>	<p>Maximum 8 years from the date of the performance of the contract.</p> <p>8 years for VAT records from the performance of the contract</p>
3. Security	Security information	Technical information, as described above, plus any other information that may be required for this purpose	To protect our websites and infrastructure from cyber attack or other threats and to report and deal with any illegal acts.	Legitimate interest	Internally, forensic and other organisations with whom we might contract for this purpose.	Relevant statutes of limitation
4. Communications	Contact information	Names, contact details, identification details	To communicate with you about any issue that you raise with us or which follows from an interaction between us.	Legitimate interest	Internally and, as necessary, with professional advisers.	Relevant statutes of limitation.

5. Storage of personal data

Teleos Systems Limited is a UK-domiciled organisation whose primary offices are in the UK.

- Our Support Ticketing System is hosted in the EU and is accessed only by our EU-based staff.
- Our customer relationship management, marketing and accounting systems are either EU-based or hosted by companies participating in the EU - U.S. Privacy Shield Framework.
- We use a wide range of Cloud Service Providers (CSPs) as part of our processing environment. Unless we specifically state otherwise, we are, in respect of all these CSPs, the data controller.
- Unless we specifically state otherwise all of the CSP's that we use utilise EU-located processing facilities.
- Our payment processors and banking arrangements are based in the EU and, for our iPhone app, in the USA.
- We ship and deliver physical products around the world; we therefore use logistics companies that are based outside the EU and operate in other countries. We have appropriate legal and security relationships with those partners.
- We may resell products supplied by organisations outside the EU. This may mean that our resale partner will have access to information about data subjects who purchase their products.
- We operate a data retention policy in respect of all data, whether paper-based or digital and those aspects of it which relate to personal data are contained in the table at 4, above.
- We may, from time to time, upload a copy of your Practice database in order to fault find an issue. This data would be securely held on a server at Fort Dunlop and would only be uploaded with your express permission. Data would be securely deleted once the specific issue was resolved.
- In the event of you changing your Practice Management System to Teleos, we would retain a copy of your original data in case of any data conversion issues that may arise. We would hold this data for a period no longer than 18 months on a secure server in Fort Dunlop.

6. Security measures

We have what we believe are appropriate security controls in place to protect personal data. Risk assessment, including assessing risks to the rights and freedoms of data subjects, is at the heart of our ISMS. We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

7. Your rights as a data subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email GDPR@teleosvet.co.uk or use the information supplied in the Contact us section below. In order to process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

- **The right to be informed**
As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.
- **The right of access**
You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
 - b) The categories of personal data concerned
 - c) The recipients to whom the personal data has been disclosed
 - d) The retention period or envisioned retention period for that personal data
 - e) When personal data has been collected from a third party, the source of the personal data
- If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.
- **The right to rectification**
When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.
- **The right to erasure (the 'right to be forgotten')**
Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.
- **The right to restrict processing**
You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:
 - a) The accuracy of the personal data is contested
 - b) Processing of the personal data is unlawful
 - c) We no longer need the personal data for processing but the personal data is required for part of a legal process
 - d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing
- **The right to data portability**
You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.
- **The right to object**
You have the right to object to our processing of your data where
 - Processing is based on legitimate interest;
 - Processing is for the purpose of direct marketing;
 - Processing is for the purposes of scientific or historic research;
 - Processing involves automated decision-making and profiling.

8. Contact us

Any comments, questions or suggestions about this privacy policy or our handling of your personal data should be emailed to GDPR@teleosvet.co.uk

Alternatively, you can contact us using via the following postal address or telephone number:

GDPR Compliance Manager
Teleos Systems Limited
319 Fort Dunlop
Fort Parkway
Birmingham
B24 9FD
United Kingdom

Telephone: +44 (0)1480 393604

Our telephone switchboard is open 9:00 am – 5:30 pm GMT, Monday to Friday. Our switchboard team will take a message and ensure the appropriate person responds as soon as possible.

9. Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the European Union. For the United Kingdom, this is the Information Commissioner's Office (ICO), who is also our lead supervisory authority. Its contact information can be found at <https://ico.org.uk/global/contact-us/>.