



DOG AND BOWEN DATA PROTECTION POLICY May 2018

1. Introduction

This policy sets out the obligations of Lorna MacLean (Canine Bowen Technique Practitioner trading as “Dog and Bowen”) regarding data protection and the rights of her clients in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

The Policy is to ensure that all personal data kept and processed by Dog and Bowen is dealt with in accordance with the GDPR. The data provided by the Dog and Bowen clients will be stored safely and securely.

The GDPR defines “personal data” as any information relating to a natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

Dog and Bowen is committed not only to the letter of the law but also to the spirit of the law and places high importance on the correct, lawful and fair handling of all personal data respecting the legal rights, privacy and trust of all its clients.

2. The Data Protection Principles

The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

1. Processed lawfully, fairly and in a transparent manner in relation to the person.
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
4. Accurate and, where necessary, kept up-to-date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
5. Kept in a form which permits identification of the person for no longer than is necessary for the purposes for which the personal data is processed.
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage using appropriate technical and organisational measures.



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3. Why the data is kept

Dog and Bowen needs to keep personal details of clients and their dogs in order to record, guide and supervise the dog's progress and be able to communicate effectively with the client for the best outcomes.

4. What data is kept

For each client, certain items of personal data will be recorded, including name, address, telephone number and email address. This data is collected before the start of any treatment session with the dog.

Some of this data information may be collected by email or text message.

All data will be held securely.

No client files are left where other clients or any other third party can access them.

5. How the data is used

Data will be used to communicate appointments and relevant progress updates.

The data is kept safely and securely in Lorna MacLean's home. At treatment sessions, it will be used at the client's home or alternative agreed location.

Client files are predominantly paper based and are kept securely and out of view. No copies are taken.

Client names with date and amount of payment are kept on a spreadsheet which is password controlled.

No data is shared with 3rd parties without the explicit consent of the individual client.

No data is sold to third parties for any reason.

6. Who will the data be shared with?

With the exception of the referring veterinarian, data is rarely used to communicate and be shared outside of the treatment environment. On occasion you may be asked for permission for the information to be shared with another practitioner. In this instance, full permission will be requested first.



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Where the referring veterinarian has requested a treatment report, this will be sent to them either by email or post. The client's name and address will be included on this report in addition to relevant information about the dog. A copy of this report will be shared with the client.

Where a client's dog's experience is shared with the public, either on Dog and Bowen's website, on social media or in advertising, no client details will be used. In all cases, consent will be obtained from the client beforehand.

7. How long the data is kept

In accordance with Dog and Bowen's insurance policy (provided by Balens), client files will be kept for a minimum of 7 years following the last treatment session.