

## **RVC CPD Privacy Notice**

A privacy notice is a statement that discloses some or all of the ways we as a 'Data Controller': gather, use, disclose, and manage your personal data.

### **What is a 'Data Controller'?**

The Data Controller is the body – in this case the RVC – that determines the purposes for which and the manner in which any personal data are, or are to be, processed.

### **What is 'personal data'?**

Under UK Data Protection Law "Personal data" means any information relating to an identified or identifiable living individual. "Identifiable living individual" means a living individual who can be identified, directly or indirectly, in particular by reference to (a) an identifier such as a name, an identification number, location data or an online identifier, or (b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

### **What is a 'data subject'?**

A 'data subject' is a natural living person whose personal **data** is processed by a **controller** or processor. So when we hold and process personal data about our clients they are 'data subjects'.

### **What is 'Special Category Data'?**

The law provides a separate definition for "Special Category Data". This relates to information concerning a data subject's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences. You can expect the RVC to put in place additional safeguards when processing any Special Category Data that we obtain from you and to ensure that we have a robust legal bases for doing so.

### **This Privacy Notice and the RVC's data protection obligations under UK Data Protection Law.**

One of our responsibilities is to tell you in more detail about the different ways in which we use your personal data. This Privacy Notice is designed to provide further information about these uses. In addition to the information in this notice, you may be given further information about the uses of your personal data when you use specific services and facilities offered by the RVC.

The RVC will use your personal data to carry out the necessary tasks for the administration and management of your engagement with RVC's Continuing Professional Development (CPD) services. This is likely to include your contact details, and payment details, and a record of your CPD activities.

If you have consented it may also include a record of your consent to be contacted by the RVC for a range of purposes which may include: events or clinical services relevant to the care and treatment of animals, requests to take part in research studies in support of veterinary medicine, or communications from the Animal Care Trust which is a charity that supports our activities.

In certain circumstances we may be obliged to share your information with third parties such as the police or courts.

In doing so the RVC is defined as a **Data Controller** in UK Data Protection Law and this means that we are legally responsible for the personal data we collect and hold about you.

## **Our legal bases for processing your personal data**

Where we are processing your personal data for the purposes of the CPD events you are attending we do so on the legal bases of *contract*.

Where we are processing your data for other purposes for which we have sought your consent (e.g. marketing, research) then the legal bases for processing that data is the *consent* that you have provided.

If we are obligated to share your personal data with the police or the courts then having confirmed that there is a legitimate bases for sharing we will do so on the bases of *legal obligation*.

Where we share information with third parties for the purposes of marketing and administering the CPD programme the legal bases will be *legitimate interests*. These third parties will be considered Data Processors and we will ensure that they are compliant with their obligations under UK Data Protection Law.

## **How we use your personal data.**

Your personal information is used as permitted or required by law and for a range of administrative, and, with your consent, marketing purposes in relation to the provision of CPD. Its uses include the following:

### **Communications**

The email address you provide us will be used for RVC CPD communications with you, such as marketing of our courses. We use a third party company (Campaign Monitor) to promote courses to you. Only your email address is used and an unsubscribe option is provided.

### **CPD**

We record your CPD hours for courses that you have attended. This information can be passed to the RCVS if they require. No other personal information will be shared with them.

### **Finance**

To administer the financial aspects of your relationship with us (CPD course payments).

### **Events**

To manage your use or booking of facilities and participation at events

### **Echo 360**

We may potentially capture your image and/or voice recordings as part of your learning as a result of our use of Echo 360 in specified teaching locations across the RVC campuses.

## **mycpd account management**

We will use your personal data to enable your mycpd account which allows you to following:

- **Previous Orders** – see all your previous orders listed.
- **Scheduled Courses** - find all your purchased courses which are scheduled to start on a specific date, these include onsite courses and online courses such as e-CPD, webinars and Webinar Plus. From here you can navigate to the online course.
- **Anytime Courses** - find all your purchased courses which you can start at anytime, including your recorded webinars, and recorded Webinar Plus. From here you can activate and watch your webinars. Take a look at our webinar guide for further information.
- **Certificates** - Once you have watched your webinars to request your certificates here.
- **Personal Details** - view all the personal details we have stored and make any changes.

## **Safety and Security**

If you are on the RVC's premises including parking areas at either of our site (Hawkshead Lane or Camden) then your images and those of your car may be captured on CCTV. We do this in order to keep our premises and their contents secure and help ensure the safety of both our clients, patients, staff and students.

## **Promotional, operational and educational materials / filming and photography**

Images (film or photography) maybe captured incidentally by us or by third parties (such as the BBC) at events or on Campus or more formally with your consent for promotional materials for a variety of applications including print, broadcast, and digital. In some situations your image may also be captured in crowds/background. We will endeavour to clearly signpost when filming or photography is taking place but please be aware that these images may be used. From time to time we may also take individual photographs of clients and in this case, we would seek your permission to use such images.

**UK Visas and Immigration:** We may provide information as required by law to the UKVI on individuals wanting to attend onsite CPD courses.

## **How long will we keep your personal data?**

Where we are processing your personal data for the purposes of CPD engagements we are retain this data for as long as you hold an account with us.

Where we are processing your data for other purposes for which we have sought your consent (e.g. marketing, research) then we will keep it for as long as we continue to have your consent. We will update our records by re seeking consent on a regular basis or through you telling us you no longer wish us to process your data (you may use unsubscribe options or call +44 (0)1707 666865 or [emailcpd@rvc.ac.uk](mailto:emailcpd@rvc.ac.uk)).

## **How can I access my personal information and exercise my other rights in relation to personal data that the RVC holds about me.**

Under UK Data Protection Law you have the right, subject to certain exemptions, to access the personal data that is held about you. You also have a range of further rights as follows: Right to be informed; Right of Rectification; Right of Erasure, Right to be Forgotten; Right to Restrict Processing; Right to Data Portability; Right to Object; Rights in relation to Automated Decision Making and Profiling. Details of your rights are set out in more detail in the RVC's Data Protection policy which can be found on our [website](#).

Please note you are able to access and manage your account details including your personal details on our mycpd site <https://cpd.rvc.ac.uk/mycpd>.

## **Who regulates the use of my personal information?**

The College maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with Data Protection Law. The RVC's registration number is Z6779018. Please see the [Information Commissioners Office](#) website for details.

## **Who do I contact with questions?**

If you have any questions or concerns about how your personal data is used, or you wish to exercise one of the rights outlines above please contact the College's Data Protection Officer: [data@rvc.ac.uk](mailto:data@rvc.ac.uk)

Further information, including our Data Protection Policy, can also be found on our website

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