



VETERINARY INSTRUMENTATION EXTERNAL FACING DATA PRIVACY POLICY – DPP01

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1. About Veterinary Instrumentation and Covetrus

Covetrus are a global animal-health technology and services company dedicated to empowering veterinary practice partners to drive improved health and financial outcomes. Covetrus combine products, services, and technology in a single platform that connects our customers to the solutions and insights they need to work best. Our passion for the well-being of animals and those who care for them drives us to advance the world of veterinary medicine. Covetrus is headquartered in Portland, Maine, with more than 5,000 employees, serving over 100,000 customers around the globe.

Veterinary Instrumentation (known as 'Vi') is the trading name for Animal Healthcare Services Ltd based in Sheffield in the UK and are an integral part of the Covetrus animal health family of world-wide businesses.

Veterinary instrumentation design, manufacture, stock and distribute world-wide orthopaedic solutions and supporting surgical instruments as well as other veterinary equipment obtained from established and historically proven suppliers for use in the veterinary industry.

You can find our contact details at the [last section](#) of this policy or via the website at www.vetinst.com

2. Overview

At Veterinary Instrumentation your privacy is important to us. We process personal data in different contexts, and we do so by fully respecting your privacy and your other rights and freedoms, as part of our unwavering commitment to ethical and responsible practices.

More information

This Data Privacy Policy ("Policy") sets forth the principles that govern our treatment of personal data across Veterinary Instrumentation, and their subsidiaries and affiliates worldwide (hereafter, Vi). All employees and those with whom we share personal data must adhere to this Policy.

Veterinary Instrumentation is committed to protecting the information that our employees, customers, prospects, suppliers, and vendors have entrusted to us. We collect and use personal data in order to perform our business functions and provide quality health care products and services to our customers.

Consistent with our values, we treat any personal data that we obtain in accordance with the data privacy principles of transparency (including the right to information), purpose limitation, data minimization, data quality, integrity and confidentiality, accountability, and privacy by design.

This Policy applies to all personal data in any format or medium, relating to all employees, customers, vendors and others who do business with Veterinary Instrumentation.

3. Types of personal data we collect and use

We recognize personal data as any information related to an identified or identifiable individual. Depending on the context of your interactions with Veterinary Instrumentation, we collect and use different types of personal data from employees, contractors, candidates, customers, prospect customers and vendors.

[More information](#)

Types of personal data we collect from:

- **Employees, contractors and candidates:** including contact and login information, employment details and history, benefits, compensation, performance, video images from security cameras, use of company resources for employees, contractors, and applicants all in connection with their role or potential role within Veterinary Instrumentation.
- **Customers:** including name, tax and financial information, contact information for key personnel, language, signature, communications and login information, segmentation and marketing attributes.
- **Prospect customers:** including name and contact information.
- **Customers of our customers:** we access personal data from customers of our customers, which may include sensitive information, only when it is necessary to provide the service. In this context, we act on behalf of our customers, and the service is governed by a data processing agreement.
- **Vendors and suppliers:** including name, tax and financial information, contact information for key personnel, language, communications and segmentation.
- **Visitors of an office building:** including name and contact information and video images from security cameras in some of our office buildings.
- **Website and social media users:** In addition to the information visitors volunteer, we automatically collect the domain name, Internet Protocol (IP) address, browser type and version, operating system and platform, average time spent on our website, pages viewed, information searched for, access times and other relevant statistics. Our website also uses cookies.

4. Our policy towards children

Our services are not directed to children. We do not knowingly collect personal data from children. If a parent or guardian becomes aware that his or her child has provided us with personal data without their consent, please contact us. If we become aware that a child has registered for a service and has provided us with personal data, we will delete such information from our files.

5. Sources of personal data

Veterinary Instrumentation receives and uses various types of personal data in order to conduct our day to day business activities. We apply the data minimization principle in the collection and use of personal data ensuring that we only collect information that is necessary and by fair means and providing notice and requiring consent when necessary.

More information

Some of this data is collected directly from you in the following situations when:

- You apply for a position with our company
- We negotiate and/or establish a contractual relationship (e.g. on employment or commercial terms),
- You provide us with any type of service, as a provider or vendor
- When we provide you with any type of service, product or support.
- When you browse, or use our website, e-commerce services, or social media pages

Sometimes we also obtain data from third parties including subsidiaries and affiliates of Veterinary Instrumentation Inc. worldwide, in the following situations:

- We may conduct analytics to determine additional product and services which may be of interest
- We may share data between subsidiaries or affiliates for centralizing Customer Relationship Management systems
- We may purchase data from external companies for marketing purposes

6. Uses and purposes of Personal Data

The purposes for which we collect and use your personal data may vary depending on the type of relationship you have with us, such as if you are one of our employees, customers, or a website user. Veterinary Instrumentation always collect and use personal data according to the purpose limitation principle. The use of personal data for new purposes should always guarantee consistency and your privacy expectations, otherwise we will request your authorization.

More information

- **Employees and candidates:** if you apply for a job, we use your personal data to consider you for employment and to administer your application and/or account. If you have an employment or commercial relationship with Veterinary Instrumentation, we use your personal data to develop our contractual relationship, to conduct performance evaluations and to comply with legal obligations, including tax and labour regulations.

- **Customers:** we use our customers' information to maintain our commercial relationship, to ensure the proper operation of the day-to-day business, to comply with tax and other regulations, and to administering sales, and marketing activities.
- **Customers of our customers:** we provide support services to our customers that use our health care related products and services, when required.
- **Prospect customers:** information from prospects customers is used to respond to their requests for information, products or services, and for marketing activities.
- **Vendors and suppliers:** if you have a business or professional relationship with Veterinary Instrumentation, we will use your information to develop our business relationship with you, and to comply with tax and other regulations.
- **Visitors of an office building:** our buildings and premises generally have physical and technical access controls, and some have video surveillance systems for security purposes.
- **Website, email marketing & social media users:** we collect personal data from visitors and users of our website and social media pages. We use the information to manage your account registration, to store your preferences and settings, to provide interest-based advertising, to conduct statistics and to analyze how you use our website and online services.
- **Email marketing:** Our organisation utilises Force24's marketing automation platform.

Force24 cookies are first party cookies and are enabled at the point of cookie acceptance on this website. The cookies are named below:

- F24_autoID
- F24_personID

They allow us to understand our audience engagement thus allowing better optimisation of marketing activity.

f24_autoid – This is a temporary identifier on a local machine or phone browser that helps us track anonymous information to be later married up with f24_personid. If this is left anonymous it will be deleted after 6 months. Non-essential, first party, 10 years, persistent.

f24_personid – This is an ID generated per individual contact in the Force24 system to be able to track behaviour and form submissions into the Force24 system from outside sources per user. This is used for personalisation and ability to segment decisions for further communications. Non-essential, first party, 10 years, persistent.

The information stored by Force24 cookies remains anonymous until:

- Our website is visited via clicking from an email or SMS message, sent via the Force24 platform and cookies are accepted on the website.
- A user of the website completes a form containing email address from either your website or your Force24 landing pages.

The Force24 cookies will remain on a device for 10 years unless they are deleted.

Other Tracking

We also use similar technologies including tracking pixels and link tracking to monitor your viewing activities

Device & browser type and open statistics

All emails have a tracking pixel (a tiny invisible image) with a query string in the URL. Within the URL we have user details to identify who opened an email for statistical purposes.

Link Tracking

All links within emails and SMS messages sent from the Force24 platform contain a *unique tracking* reference, this reference help us identify who clicked an email for statistical purposes.

- We also may use personal data of our employees, customers, prospects, vendors or suppliers for other purposes based on our legitimate interests, such as to conduct analysis of supplier performance, for product development, to create statistics about product performance to generate profiles for job specifications.

7. Legal basis for data collection and use

Veterinary Instrumentation only collects and uses personal data when there is a fair and legal basis for its collection and use, for instance, when the collection of personal data is necessary to enter into a contract, to meet our legitimate interests, to comply with legal obligations or when we have your authorization.

More information

The information we collect when we enter into a contract or business relationship with you, except if we indicate otherwise, is mandatory to develop our contractual relationship and to comply with legal obligations. For instance, some tax laws, labor, anti-fraud or compliance laws require organizations to collect certain information that may vary depending on the local regulations. Without the required mandatory information, we would not be able to work with you.

Marketing activities are usually based on your consent or to an existing business relationship with us. However, you can opt-out of these communications anytime and free of charge.

When we use your personal data for our legitimate interests, we always conduct a balancing test in order to ensure that data subject rights are not overridden.

Finally, when we have access to personal data on behalf of our customers, in our role as data processors, there is always a written contract regulating the service, including specific instructions for the data processing and safeguards.

8. Retention periods

Veterinary Instrumentation applies the storage limitation principle in order to retain personal data in our records only for the length of time required to fulfill the purpose for which the data was collected. We do not keep personal data for longer than is necessary, and what is necessary depends on specific circumstances such as regulations requiring retaining information for a certain period of time and limitation periods of legal claims.

More information

The retention period depends on the context in which we process data such as data from use of our website, data from prospective employees, or employee data after employee has left the company. The retention periods are established considering Veterinary Instrumentation's legitimate business purposes and according to local regulations.

9. Disclosures to Third Parties and processing activities

At times, Veterinary Instrumentation engages third party contractors, service providers, and other vendors to help us accomplish our business objectives. There are other circumstances where we are required by law to disclose personal data to third parties such as public bodies or judicial authorities.

More information

We engage with third party contractors, service providers and other vendors for the following services:

- Subcontract product manufacture and repair
- Courier and transport services
- IT support services
- Building, infrastructure and equipment maintenance and repair services

If the engagement involves the transmission of personal data, Veterinary Instrumentation requires the service provider to treat that data consistent with this Policy. A contract to protect the personal data should be executed before any data is disclosed.

In certain circumstances, Veterinary Instrumentation may be required to disclose personal information when required by law, when required to protect our legal rights, or in an emergency where the health or security of an individual is endangered.

We may also disclose personal data in the context of any sale or transaction involving all or a portion of the business.

10. Security

Veterinary Instrumentation is committed to the security, confidentiality and integrity principle. We take commercially reasonable precautions to keep all information obtained from our online visitors secure against unauthorized access and use and we periodically review our security measures. We are committed to processing your data in a secure manner and have put in place specific technical and organizational measures to prevent the personal data we hold from being accidentally or deliberately compromised.

More information

Veterinary Instrumentation uses VeriSign for its site's security certificates. Please be aware that these protection tools do not protect information that is not collected through our Web site, such as information provided to us by e-mail.

We also conduct information risk assessments, we ensure that our staff understands the importance of protecting personal data, and we are responsibly managing access rights within the company. We include both physical security and IT security in our overall data security approach. We are diligent in selecting vendors that process personal data on our behalf so that they also ensure appropriate technical and organizational measures to protect the data.

Veterinary Instrumentation makes reasonable efforts to notify individuals and regulatory authorities, as required by law, if we reasonably believe that personal information has been stolen, disclosed, altered or infringed by an unauthorized person. We create and maintain a breach notification and reporting protocol.

We also endorse the concept of privacy by design which is an approach to projects that promotes privacy and data protection compliance from the outset. This means considering the privacy and security implications for any new project or process throughout its lifecycle.

11. Your data protection rights and choices

If you reside or otherwise find yourself in the territory of Europe, Veterinary Instrumentation is committed to facilitate the exercise of your rights granted by the European data protection law. Otherwise you can contact us at any time to discuss your privacy concerns.

More information

Privacy rights under the European regulation:

Transparency and the right to information: we provide notice to our employees, customers, suppliers, vendors and others of how we use personal data in our day-to-day operations at the time of collecting personal data, or as soon thereafter as possible. We also publish this privacy notice for a greater transparency.

Right to access, rectification, restriction of processing, and erasure: we provide data subjects with access to their own personal data where required by applicable law. In addition, we will rectify their personal data when it is incorrect and inaccurate, and we will ensure the right to erasure and to restriction of processing when these rights are not compatible with local regulations.

Right to object and withdraw consent at any time: for all marketing materials, you can opt-out anytime, and free of charge. The right to object for other processing activities will be balanced in order to ensure that it is not incompatible with local regulations or the legitimate interests of Veterinary Instrumentation.

Right to data portability: based on your specific situation, we provide data subjects with the right to obtain and reuse your data across different services and includes transferring of your data to you, another controller or a trusted third party.

Right to lodge a complaint with a supervisory authority

These requests should be submitted as follows:

- Opt-out of marketing communications: you can opt-out anytime by following the opt-out instructions in our commercial e-mails. Please contact the Vi Marketing Specialist jack.dixon@covetrus.com to opt out and confirm opt in for all other marketing communication.
- To exercise the rest of your rights: you should send a communication in writing to the Vet Tech Director at Vi in Sheffield linda.capewell@covetrus.com and provide suitable information to verify your identity. Veterinary Instrumentation will attend to your request in a timely manner within 30 days after receiving your request. If for any reason we need to extend this period, we will contact you.
- Right to lodge a complaint with a supervisory authority: you can have the right to lodge a complaint with the supervisory authority of your habitual residence, place of work or place of the alleged infringement. In the UK this is the Information Commissioners Office (ICO).

12. International Transfers of Personal Data

If you are located outside the United States and you interact with our website or provide us personal data, then your personal data may be transferred to the United States. If you are based in the European Economic Area or Switzerland, please be informed that the United States is not in the list of countries that the European Commission considers adequate to the protection of personal data. However, we provide appropriate safeguards for your data in the US, as we elected to self-certify under the EU-US Privacy Shield and under the Swiss-US Privacy Shield.

13. Changes to this notice

We reserve the right to modify this Policy and related business practices at any time. We will duly inform you of any changes.

More information

The latest version of this policy is maintained on the company website www.vet-inst.com. This allows you the opportunity to express your consent for processing your data for different and new purposes when we will inform you about the legal basis of such processing other than consent to any data changes. The time stamp you see on the Policy will indicate the last date it was revised.

14. Contact information

At Veterinary Instrumentation we are committed to apply this Policy and the accountability principle. For this reason, if you have any concern or questions about how your personal data is used, please feel free to contact us.

More information

If you have any concerns or questions about how your personal data is used, please contact us at:

Animal Healthcare Service T/A Veterinary Instrumentation

Distington House

26 Atlas Way

Sheffield, S4 7QQ

Attn: Linda Capewell – Vet Tech Director

Telephone + 44 (0) 114 250 5165

Or calling Veterinary Instrumentation on 0345 130 9596

You can also contact the Covetrus UK Data Protection Officer, robert.hulme@covetrus.com at the address below:

Covetrus Operations UK

College Mains Rd

Dumfries

Scotland

DG2 0UN

Telephone +44 (0) 1327 274700

We will promptly respond and make everything possible to address your concern

15. General Information

Policy Owner: Linda Capewell, Vet Tech Director

Policy Contact: Andy Taylor, QA/RA Manager

Published Date:¹ January 2018

Required Adoption Date:² May 2018

Date Last Revised:³ October 2019

Approved By: Bill Pelling, Managing Director

Revision History		
Date of Revision	Revision Recap	Requires Site Re-Confirmation? (Y/N)
January 2018	Creation	No

¹ Published Date – The original published date the policy was approved by Senior Company Management

² Required Adoption Date – Date by which all subsidiaries of Veterinary Instrumentation, Inc. need to comply with the policy

³ Date Last Revised – Last date policy was updated

February 2018	Adapted and modified for Veterinary Instrumentation business unit	Yes
May 2019	Update removing reference to Henry Schein replacing with Covetrus	No
October 2019	Section 14 update with new company address and UK DPO	No
February 2021	Section 6 update to incorporate Force24 onboarding	No