

ACT Physiotherapy (ACTP) is dedicated to protecting the confidentiality and privacy of all information entrusted to us. As part of this fundamental obligation, ACTP is committed to the appropriate protection and use of personal information collected through our referral processes, administrative systems, websites, telephone calls, emails and other communication methods.

This notice explains why we process your data, the lawful basis that permits us to do so, how long we retain your information, and your rights under data protection law.

We may update this policy periodically. You should check this page from time to time to ensure you are happy with any amendments. This policy is effective from **6th July 2026**.

A) DATA PROTECTION PRINCIPLES

Under the General Data Protection Regulation (GDPR), all personal data obtained and held by us must be processed according to core principles. In accordance with these principles, we will ensure that:

a) Processing is fair, lawful and transparent b) Data is collected for specific, explicit and legitimate purposes c) Data collected is adequate, relevant and limited to what is necessary d) Data is kept accurate and up to date; inaccuracies will be rectified or erased without delay e) Data is not kept for longer than necessary f) Data is processed securely, protecting against unauthorised access, loss, destruction or damage g) We comply with GDPR requirements for any international transfers of personal data

B) TYPES OF DATA COLLECTED AND HELD

ACT Physiotherapy may collect the following information:

- Name
- Address and postcode
- Contact information including email address and telephone number
- Pet information relevant to physiotherapy treatment
- Veterinary referral information

Website data may also be collected through analytics tools that track website traffic and user behaviour.

C) COLLECTING YOUR DATA

You provide data to us directly during initial contact and at your physiotherapy assessment.

In some cases, data is provided by third parties such as veterinary practices or specialist referral centres when they refer your pet for physiotherapy.

Personal data is stored securely within Aquatic Canine Therapy (South) Ltd (ACTs) clinical records and administrative systems provided by a third party SHARC Ltd. ACT acts solely as an **administrative provider**, supplying client referrals, use of the client database, accounting system and obtaining veterinary consent, and processing insurance documentation on behalf of ACTP.

D) LAWFUL BASIS FOR PROCESSING

Data protection law allows us to process your personal data for specific reasons. We process your data under the lawful basis of **legitimate interests**, enabling us to provide physiotherapy services and fulfil administrative requirements.

Activity requiring your data	Lawful basis
Obtaining veterinary consent to begin physiotherapy treatment	Legitimate interests
Maintaining accurate personal and clinical records	Legitimate interests
Ensuring administrative and IT systems remain secure	Legitimate interests
Processing insurance claim forms	Legitimate interests
Managing referrals and communication between ACT and ACTP	Legitimate interests
Website analytics to improve service delivery	Legitimate interests

E) FAILURE TO PROVIDE DATA

If you fail to provide necessary data, we may be unable to fulfil our obligations to you. This may include being unable to offer physiotherapy treatment for your pet.

F) WHO WE SHARE YOUR DATA WITH

Your data may be accessed by:

- ACT Physiotherapy (ACTP) for clinical treatment and record-keeping
- Aquatic Canine Therapy (South) Ltd (ACT) for administrative processing only
- SHARC Ltd when resolving database issues

All parties operate independently. ACTP provides physiotherapy treatment; ACT provides administrative support. SHARC provide a client software.

Data may also be shared with:

- Veterinary practices to obtain full veterinary records and provide treatment plans
- Other clinical professionals (e.g., acupuncture, physiotherapy providers) where you request additional services or relocate to a different area.

We do **not** share your data outside the European Economic Area.

All individuals handling your data are trained in GDPR compliance.

G) PROTECTING YOUR DATA

We take appropriate technical and organisational measures to protect your data against accidental loss, disclosure, destruction or misuse.

Please note that ACT Physiotherapy's website may contain links to external sites not covered by this Privacy Policy. We encourage users to review the privacy policy of any external website before providing personal information.

H) RETENTION PERIODS

We retain your data only for as long as necessary. This will be at least for the duration of your pet's physiotherapy treatment.

Some retention periods are set by law. For example:

Record Type	Statutory Retention Period
Name, address, contact details, account transactions (for HMRC compliance)	6 years from the date of your last session

I) CONSENT

Where you have provided consent for the use of your data, you may withdraw that consent at any time. Upon withdrawal, we will stop processing your data unless another lawful basis applies.

J) MAKING A COMPLAINT

If you believe your data rights have been breached, you may raise a complaint with the Information Commissioner's Office (ICO):

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Telephone: 0303 123 1113 or 01625 545 745

K) DATA PROTECTION COMPLIANCE

Our appointed compliance officer for data protection activities is: **Michelle Silvester**