



Virtually Yours - the obvious solution

Privacy and Data Protection Policy

Commitment

Virtually Yours is committed to ensuring that all personal data is handled responsibly, lawfully and securely. As such, your privacy is critically important and I am responsible for ensuring that the fundamental principles below are met.

- I ensure that your data is processed lawfully, fairly and in a transparent manner
- I only collect your data for specified, explicit and legitimate purposes
- I only gather your data if it is adequate, relevant and limited to what is necessary
- I make sure that wherever possible, your data is accurate and properly maintained
- I only keep your data for as long as necessary
- I ensure that your data is protected and handled securely

Below is Virtually Yours' privacy notice, which incorporates and clarifies these principles.

"Personal data" means any information relating to an identified or identifiable natural person (known as the 'data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Data subject: The "data subject" is the individual that the personal data relates to and identifies

Data controller: "Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data

Data processor: "Processor" means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller

Processing: "Processing" means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

Filing system: "Filing system" means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis

Consent: "Consent" of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which, he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her

Legitimate interest: "Legitimate interest" is a designation for the use of personal data where that data is controlled and/or processed by the company or processed by a 3rd party contractor of the company, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data, in particular where the data subject is a child

Special category: "Special category" data is personal data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, sex life or sexual orientation

Data breach: "Personal data breach" means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed

Who I am and what this notice covers

Virtually Yours is a virtual assistant business based in Hazlemere, Buckinghamshire.

This policy document aims to outline my approach to the obtaining, handling, retention, disposal and data protection throughout the life cycle of my interaction with your data, for me and my partners (where applicable), and your choices and rights within each of these.

This Privacy Notice applies to information that I collect about you when:

- Having personal interactions via various forms of electronic messaging, voice and video communication or face to face
- Communication of relevant marketing information that you have either consented to or otherwise expect from me as part of an established relationship
- Out of contractual necessity such as in the delivery of products or services
- From any 3rd party with whom you have agreed for them to share your data with me

Throughout this Privacy Notice I'll refer to other products and services collectively as "services."

Below I explain how I collect, use and share information about you, along with the choices that you have with respect to that information.

Information I collect

I only collect information about you if I have a reason to do so; for example, to provide my services, to communicate with you, or to improve my service.

I collect information when you provide information to me. The amount and type of information depends on the context, and how and what the information is used for. Here are some examples:

- **Basic online account information:** I ask for basic information from you in order to set up your account. For example, to activate an online account I require a username and email address. You may also provide me with more information, like your name.

- **Transaction and billing information:** If you ask me to provide a service to you, you will need to provide additional personal and payment information that is required to process the transaction and your payment, such as your name, card information, and contact information.
- **Communication purposes:** You may also provide me information if you respond to surveys or communicate with me about support.

What happens to the information I gather

I require this information to understand your needs and provide you with a better service and in particular for the following reasons:

- Internal record keeping
- I may use the information to improve my products and services
- I may periodically send promotional emails about new products, special offers or other information which I think you may find interesting using the email address which you have provided
- From time to time, I may also use your information to contact you for market research purposes. I may contact you by email, phone or mail. I may use the information to customise the website according to your interests.

How I use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

I use traffic log cookies to identify which pages are being used. This helps me to analyse data about web page traffic and improve the website in order to tailor it to customer needs. I only use this information for statistical analysis purposes.

Overall, cookies help me to provide you with a better website, by enabling me to monitor which pages you find useful and which you do not. A cookie in no way gives me access to your computer or any information about you, other than the data you choose to share with me.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites

My website may contain links to other websites of interest. However, once you have used these links to leave the site, you should note that I do not have any control over that other website. As a result, I cannot be responsible for the protection and privacy of any information which you provide whilst visiting those other sites and those sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

- whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes

- if you have previously agreed to my using your personal information for direct marketing purposes, you may change your mind at any time by writing to us.

I will not sell, distribute or lease your personal information to third parties unless I have your express permission or are required by law to do so. I may use your personal information to send you promotional information about third parties which I think you may find interesting if you tell us that you wish this to happen.

If you believe that any information being held is incorrect or incomplete, please write or email me as soon as possible. I shall promptly correct anything found to be incorrect.

I do not sell or share my clients' private personal information.

Retention

I only retain data for as long as is necessary to satisfy the following requirements:

Legal: I am required to meet legal obligations in terms of retention periods for some data, such as financial records and information. (Seven years for any document relating to financial transactions.)

Contractual: Your data will be retained for the duration of your contract, as required by me to fulfil our contractual obligations. Following the end of the contract term I retain your information and a period of 18 months for marketing and business analysis purposes.

Marketing: Where data is held for marketing purposes then I hold this for 18 months of inactivity prior to destruction.

Business Analysis: Where data is held for business analysis purposes, data is limited to only that necessary to perform the analysis. I retain business analysis data for 18 months.

Data Destruction/Erasure

I aim to keep the amount of personal data held to a minimum and so, unless I have received a specific request from you to erase any of your data before the retention periods expire, I will either destroy or return to you any data that has reached the end of its retention period.

Your Rights

When it comes to personal data you have defined rights regarding how your data is collected, processed and shared. You have a legal right to process personal data as follows:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure (right to be forgotten)
- The right to restrict processing
- The right to data portability
- The right to object
- The right with regard to automatic processing and profiling

Complaints

If you have any complaints about the way in which your personal data is being handled, then please contact me using the contact details below.

To contact Virtually Yours about your personal data, you may contact the data controller at:

Nicola@virtually-yours.org.uk