

secureVirtual General Privacy Policy

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Terms Used

The following terms are used in this Privacy Policy:

<i>“the Company”, “sV”, “secureVirtual”, “we”, “us”, “our”</i>	means secureVirtual Limited
<i>“Personal Data”, “Personal Information”</i>	means data relating to a living individual who can be identified either from said data, or from that data together with any other information in the possession of the Company.

Purpose

A ‘privacy Policy’ is a document issued by an organisation which explains how Personal Information about individuals is collected, used and shared.

This Privacy Policy is issued by secureVirtual Ltd of 70 Hill Street, Richmond upon Thames, London TW9 1TW, and the intended audience is likely to be, but not limited to:

- Customer End User’s
- Visitors to our website
- Prospective Customer End User’s

There is a separate Privacy Policy available for information we collect for employees of secureVirtual, which can be found on our website, called [‘secureVirtual Employee Privacy Policy’](#)

By issuing this Privacy Policy, we demonstrate our commitment to openness and accountability. We recognise the importance of protecting personal and confidential information and take care to meet legal and statutory obligations including, but not limited to, compliance with:

- Data Protection Act 1998
- Human Rights Act 1998
- Computer Misuse Act 1990
- International information Security Standards
- General Data Protection Regulations 2018

Personal Data That We Collect

This section of the privacy Policy covers the various sources by which an individual’s Personal Information may be collected by secureVirtual, or its service providers (Suppliers), relating to, but not limited to:

- Our Website visitors
- Prospective and current customers
- Suppliers (service providers)
- Other 3rd parties and public sources

Source: Website

The information we collect via the Website may include:

Personal Details

Any personal details you knowingly provide us with through forms and our email, such as name, address, telephone number, etc.

Payments

In order to effectively process credit or debit card transactions it may be necessary for the bank or card processing agency to verify your personal details for authorisation outside the European Economic Area (EEA). Such information will not be transferred out of the EEA for any other purpose.

Preferences

Your preferences and use of email updates, recorded by emails we send you (if you select to receive email updates on products and offers).

IP Address

A string of numbers unique to your computer that is recorded by our web server when you request any page or component on the Website. This information is used to monitor your usage of the Website.

Cookies

Data stored on your device and recorded by the Website which primarily allows us to recognise you and your preferred settings. See secureVirtual Cookie Policy below.

Source: Prospective and Current Customers, Suppliers and other 3rd Parties

Personal Information may be submitted to secureVirtual in a number of ways. The following list is not exhaustive but covers many obvious sources:

1. Directly via email communication with secureVirtual.
2. Through information submitted by an individual's organisation to us, that enables secureVirtual to fulfil our service agreement to that organisation.
3. Via social media (e.g. LinkedIn) and publicly available sources of information (articles, magazines, websites, etc).
4. Directly to secureVirtual through the course of engagement for business, for example: In the course of providing secureVirtual with a service, or requesting a service from secureVirtual.

In such circumstances where sV is the IT Managed Services Provider to an organisation (i.e. a Customer) then sV is the Data Processor and the Customer is the Data Controller in all circumstances other than the retention of Personal Information for key contacts which will be held in our CRM database for the purposes of carrying out legitimate business function.

Personal Information we collect from prospective and current customers, suppliers and other 3rd parties include:

- **Contact Information:** May include an individual's name, contact details, title, address, and any details of their engagement with secureVirtual.

Source: Publicly Available Data

For the legitimate purposes of carrying out business transactions, providing business services, and promoting the products and services that sV supply, we may make use of publically available data from social media, Companies House (UK) and other legitimate public data sources.

secureVirtual Cookie Policy

Our website uses certain technologies to collect information about its use, distinguish between users and help us provide a good experience to visitors of our website. When you visit our website, cookies or similar technologies will be placed on your computer or other device (e.g. mobile, laptop, tablets). Some examples of the cookies we use include, but not limited to: `_atuvc`, `_atuv`s, `_ga`, `_gid`

What are cookies?

Small text files that are placed on your device (computer, phone, laptop, tablet, etc.) when you visit our website. A cookie file is stored on your device and allows us, or our third party partners to recognise you each time you revisit our website.

How does secureVirtual use cookies?

Cookies allow us to recognise users (where appropriate), and helps us improve the user experience. Without certain types of cookies enabled, we can't guarantee that the website and your experience of it are as we intended it to be.

We use cookies to obtain information about your visits and about the device you use to access our website.

This includes where available, your IP address and pseudonymous identifiers, operating system and browser type and, depending on the cookie, also includes the reporting of statistical data about our users' browsing actions and patterns.

Types of cookies

The length of time a cookie stays on your device depends on its type. There are two main types of cookies used by the majority of sites, including our website:

1. **Session cookies** Also called a transient cookie, a cookie that is erased when the user closes the Web browser. The session cookie is stored in temporary memory and is not retained after the browser is closed. Session cookies do not collect information from the user's computer.
2. **Persistent cookies** Also called a permanent cookie, or a stored cookie, a cookie that is stored on a user's hard drive until it expires (persistent cookies are set with expiration dates) or until the user deletes the cookie..

How you can control and delete cookies

Cookies help you get the most out of our website. You can however set up your browser to delete or refuse some or all of them, or to notify you when you are sent a cookie and therefore choose whether or not to accept it. You may also delete or refuse, some or all of the cookies, on our website at any time.

Here are links to the cookie management page for some of the most popular web browsers:

[Chrome](#), [Internet Explorer](#), [Firefox](#), [Safari](#)

How We Use Personal Data We Collect

We use this information to communicate with individuals, e.g. respond to queries submitted by the named user, or their organisation on their behalf, and to continue a dialogue with individuals in respect to service delivery.

We may also use information to process orders, and in such circumstances it may be necessary to pass on such personal detail to 3rd party organisations for the purposes of providing a service – e.g. an individual's name to provide an email service. By signing any agreement with secureVirtual, an individual, or an organisation on their employee's behalf, is providing sV permission to use such personal information in this way for the provision of a service to which the individual or organisation is subscribed.

Additionally, we may use this data to communicate with prospective customers and suppliers where dialogue would otherwise be impossible without such personal data.

Lastly, we occasionally post some individual details of customers as testimonials or case studies, either on our Website or via other communications and advertisements, such as social media posts and other marketing collateral and activities. Usually this is limited to names and titles, and we always obtain the consent of each individual and customer organisation prior to publishing any such information where the individual could be identified via the information.

Data Retention Policy

This section outlines the basic criteria by which we will assess the retention of Personal Data only, and applies to all business units within the Company.

1. We retain Personal Data for a period of time consistent with the original purpose of collection.
2. We will decide, on the basis of reason or law (e.g. Trade law, Tax law, Employment law or Administrative law) whether we need to keep that data for the purposes of carrying out legitimate business functions.
 - a. We will review data retained on an at least annual basis, to decide if it is necessary to retain based on above.
3. No customer's end user Personal Data, for which we are the Data Processor, will be removed or destroyed for as long as the Customer remains in contract with secureVirtual, or until such time that the customer (the Data Controller) asks us to remove an End User's Personal Data.
4. No Personal Data will be removed or destroyed within any statutory period (usually up to 6 years, depending on the type of data) for which it needs to be held (unless we are requested to do so and are able to, or it is no longer required to perform a function of the business/comply with UK or EU law where applicable).
5. Non-customer, non-employee and customer Personal Data, for which we are the Data Controller (generally limited to name, role/title, work email address, and work phone number) will be retained whilst we may be actively prospecting or in communication with that individual/organisation and retained until that individual unsubscribes or requests to be removed from the system.

Your Rights (any Data Subject)

1. The right to be informed how we use your data when you supply it.
2. The right of access to the data we hold for a legitimate reason.
3. The right to rectification, if you would like for us to remove data, or amend information we hold, given that it is reasonable and we are legally able to.
4. The right to erasure of any data we hold about a data subject, but only if there is no legal, contractual or statutory reason not to.
5. The right to request that we restrict processing, such that we may store but not use your data, if we are able to comply with this request.
6. The right to data portability (only where we are the data controller for your data). This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. We can supply your data in a common and readily available format, usually CSV.
7. The right to object to processing of personal data in certain circumstances, such as direct marketing, where you may unsubscribe at any time.
8. Rights in relation to automated decision making and profiling. At present, we do not carry out any automated decision-making or profiling, but in the event that we do, this information can be provided and human intervention requested.

Any Data Subject may expect a response from secureVirtual to any legitimate, reasonable request within one calendar month. You have the right to lodge a complaint with the Information Commissioners Office (ICO, <https://ico.org.uk/global/contact-us/>) if our response to a request is considered unreasonable.

How to Control Your Personal Data

Any individual who believes that we may hold their personal data may contact secureVirtual, in writing, to request details of the data held. They may also request that their data is updated or removed from our systems or to opt out of communications from secureVirtual, unless it is essential that we have their data to run services for the organisation to which they are an employee, and where secureVirtual are also the Data Processor for that organisation.

Contacting Us

Further questions regarding this Privacy Statement or any requests relating to Personal Data, please direct to secureVirtual by writing to us at: privacy@securevirtual.com