Virtualware Innovations



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# **About This Privacy Policy**

This privacy policy sets out how Virtualware Innovations uses and protects any information that you give when you use our website, services or mailing list subscription. Virtualware Innovations is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our website, then you can be assured that it will only be used in accordance with this privacy statement. Virtualware Innovations may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

At Virtualware Innovations your privacy is of paramount importance. Any enquiries submitted through the website will ask for minimal personal data where possible. This information will then be stored in our CRM for a period of 90 days unless further storage conditions have been agreed with the customer either by contract or consent. This information is kept in our secure database and kept confidential. We do not sell or give the database content to any third parties for their use.

There is an opt in box on our contact page for inclusion on our marketing database. If you wish to remove your information from our marketing database, you can follow the unsubscribe link in our marketing email at any time to do so. Any other information stored in relation to a purchase or engagement of services will be retained according to the individual scenario. Our policy is to avoid contacting customers that have opted out or unsubscribed from our mailing lists as well as not contacting without affirmative, clear consent.

Any queries on privacy policy please email <a href="mailto:support@virtualwarein.com">support@virtualwarein.com</a>

### What we do with the information we gather

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

- Internal record keeping.
- We may use feedback information to improve our products and services.
- We may periodically send promotional emails about new products, services, job postings or other information
- which we think you may find interesting using the email address which you have provided in a marketing /career form
- We may also use your information to contact you for market research purposes. We may contact you by email or phone. We may use the information to customize the website according to the results of market research.

Information obtained and held about employees of clients is used solely for the provision of support services or service updates.

# Legal Basis for Collecting, Controlling and Processing

### Information

To perform as an IT Consulting company the information we collect is primarily controlled and processed by Virtualware Innovations as an element of Business Interest.

For Enquiries:

- The basis for controlling and processing information submitted as an enquiry is consensual.



- Information is collected with clear consent from the individual either through our website, telephone oremail.
- If an enquiry progresses to quotation, support etc. and the nature of the relationship changes, the legal basis for holding this information will be changed accordingly.
- The information gathered will be:
  - o Name
  - O Contact information including email address and phone number
  - o Business Association

#### For Marketing:

- The basis for controlling and processing marketing information is consensual.
- Information is submitted to Virtualware Innovations for collection via email, website or telephone for specific marketing purposes.
- The information gathered will be:
  - o Name
  - O Contact information including email address and phone number
  - o BusinessAssociation

#### For Ad-Hoc Support/Engagement or Project work:

- The basis for controlling and processing data is a legitimate business interest.
- Information is collected by Virtualware Innovations through direct contact with a company representative or the individuals concerned.
- The information gathered will be:
  - Name
  - Contact information including email address and phone number
  - IP and MAC Address of supported devices
- If required information is withheld, Virtualware Innovations may not be able to fulfill the agreed duties and cannot be held liable for failure to perform as expected.
- Additional Information which may be visible to Virtualware Innovations includes any information stored or processed on a supported device. This information will not be recorded, Controlled or Processed by Virtualware Innovations unless explicitly instructed by the individual and/or business.

#### For Contracted Support/Engagement:

- The basis for controlling and processing data is on a contractual basis.
- Information is collected by Virtualware Innovations through direct contact with a company representative or the individuals concerned.
- The information gathered will be:
  - O Name
  - O Contact information including email address and phone number
  - IP and MAC Address of supported devices
- If required information is withheld, Virtualware Innovations may not be able to fulfill the contractual agreement and the client will be in breach of the agreement.
- Additional Information which may be visible to Virtualware Innovations includes any information stored or processed on a supported device. This information will not be recorded, Controlled or Processed by Virtualware Innovations unless explicitly instructed by the individual and/or business.



### Virtualware Innovations Data Processing Partners

Virtualware Innovations may, in the course of business, require the use of software and services provided by our partners for the processing of personal data. Virtualware Innovations supplier vetting process ensures that our partners process data securely and in accordance with our standards, within a limited scope.

#### Partners who process Virtualware Innovations data regularly include:

- Service Management and Customer Relationship Management
- Remote Monitoring and Management of Customer Devices
- Mail Filtering
- Email Provision, Data Storage
- Quotations, Invoicing, Accounting
- Marketing
- Transaction Processing
- Connectivity and Telephony Services
- Data Storage
- Credit Checking and Finance Partner

While every effort is taken by Virtualware Innovations to ensure our partners are responsible with data they are not subject to this Privacy Policy.

Virtualware Innovations will provide contact information for relevant individuals within Partner organizations for any enquiries from clients around data processing.

### Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways: If you have opted to receive marketing communication from us:

- You can unsubscribe via the link in the emails
- You can email <u>support@virtualwarein.com</u> with the subject "unsubscribe" or "Subject Access Request" where you can unsubscribe from our mailing list, receive a record of the information held about you or update your information if it is inaccurate.

#### If your employer has provided us with your information to assist in providing service:

- You can email <u>support@virtualwarein.com</u> with the subject line "Subject Access Request" to request a record of the information held about you and to amend it.
- Please note that the information held about employees of clients is restricted for business communication and the fulfillment of support services.
- As this information is held for legitimate business interests and/or to perform a contract individuals cannot opt-out from communication.

#### If we have contacted you without your permission:

Please email <u>support@virtualwarein.com</u> to let us know how we contacted you and when. We will then identify any potential issues with our permissions and resolve these with you.

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



If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at <u>support@virtualwarein.com</u>. We will work with the individual to correct any information found to be incorrect.

# Security

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

## Retention

Virtualware Innovations endeavor to retain personal data for the minimum amount of time practicable. Personal data which has been provided to us in various ways is retained for different periods of time:

• Website/Telephone/Email Enquiry: - Retained for 180 Days

However, if the enquiry is for marketing information or transitions to a provider/client relationship the retention period is set by those.

### Marketing Opt-In:

- Retained until unsubscribed

### Client Engagement:

- Retained for the length of the contract/engagement then for an additional 2 years.

### Client's Employee:

- Retained following client engagement period or;
- The length of employment with client and then an additional 2 years.

## **Financial Information**

We will never ask for financial information through our website. Any financial information provided to Virtualware Innovations should be a business bank account and will be managed through a Direct Debit Mandate.

If you have a query about payments and invoices, or if you notice a suspicious email regarding finances please email accounts@virtualwarein.com

### Subject Access Request

In compliance with the General Data Protection Regulations any individual whose data is held or processed by Virtualware Innovations may submit a "Subject Access Request".

A Subject Access Request is:

- Confirmation that your data is being processed;
- access to your personal data; and
- Other supplementary information this largely corresponds to the information that should be provided in a privacy notice.

Any Subject Access Request should be emailed to <u>support@virtualwarein.com</u> with the subject line "Subject Access Request". We will then confirm your identity before providing you with the requested information in a digital format.

Virtualware Innovations reserve the right to charge an administrative fee for excessive or manifestly unfounded requests which will be based on our hourly administrative fees.



## Right to Rectification

In compliance with the General Data Protection Regulations any individual who believes that any data Virtualware Innovations holds or processes is incorrect can submit a "Data Rectification Request".

A Data Rectification Request should be processed when:

you believe personal data to be inaccurate;

Any Data Rectification Request should be emailed to <u>support@virtualwarein.com</u> with the subject line "Data Rectification Request". We will then confirm your identity before identifying the inaccuracy and, if appropriate, rectifying it.

Virtualware Innovations reserve the right to charge an administrative fee for excessive or manifestly unfounded requests which will be based on our hourly administrative fees.

### Virtualware Innovations Contacts

While Virtualware Innovations Privacy Policy is intended to be comprehensive in scope and clarity, clients and prospective clients should note that individuals responsible for the Control and Processing of data are happy to engage around any questions or concerns from individuals. For any enquiries please email <a href="mailto:support@virtualwarein.com">support@virtualwarein.com</a>.

### How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. If you agree, the file is added, and the cookies helps analyses website 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.

We use traffic log cookies to identify which pages are being used. This helps us analyses data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. No personal data is gathered by these cookies.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages individuals find useful and which they do not. A cookie in no way gives us access to an individual's computer or any information about them, other than the data they choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. This should not prevent you from taking full advantage of the website features.

### Links to otherwebsites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website or its content. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

If one of these links directs you to an unexpected destination, please email <u>support@virtualwarein.com</u> and let us know which link and the destination you arrived at.