

## **Privacy Policy**

Welcome to the privacy policy of Virtually Edge, hereafter referred to as "we," "us," or "our." This policy outlines how we collect, use, and protect your personal data. By using our services, you consent to the practices described in this policy through your use of our site <u>www.virtuallyedge.co.uk</u>

By providing us with your data, you warrant to us that you are over 13 years of age.

Contact details

Our full details are:

Full name of business: Virtually Edge

Email address: info@virtuallyedge.co.uk

Postal address: Chelsea, London, SW10

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing <u>info@virtuallyedge.co.uk</u>

# WHAT DATA IS COLLECTED ABOUT YOU, FOR WHAT PURPOSE, AND ON WHAT GROUND IS THIS PROCESSED

Personal data refers to any information that can identify an individual. It does not include anonymised data.

We may process the following categories of personal data about individuals:

- **Communication Data** refers to any communication sent to us, whether through the contact form on the website, email, text, social media messaging, social media posts, or any other method. This data is processed for the purposes of communication, record keeping, and the establishment, pursuance, or defence of legal claims. The lawful basis for this processing is our legitimate interests, which include responding to communications, maintaining records, and establishing, pursuing, or defending legal claim.
- **User Data** comprises information about how individuals use the website and any online services, along with any data they post for publication on the website or through other online services. This data is processed to operate the website, ensure relevant content is provided, maintain the security of the website, keep backups of the website and/or databases, and enable the publication and administration of the website, other online services, and the business. The lawful basis for this processing is the organisation's legitimate interests, which include enabling the proper administration of the website and the business.
- **Technical Data** includes information about how individuals use the website and online services, such as IP addresses, login data, browser details, length of visit to pages, page views and navigation paths, frequency of website usage, time zone settings, and other technology on the devices used to access the website. The source of this data is our analytics tracking system. This data is processed to analyse usage of the website and other online services, administer and protect the business and website, deliver relevant content and advertisements, and assess the



effectiveness of advertising. The lawful basis for this processing is the organisation's legitimate interests, which include enabling proper administration of the website and business, facilitating growth, and informing marketing strategy.

- **Customer Data** includes information related to any services requested, such as the individual's name, title, billing address, email address, phone number, contact details, and any relevant service details. This data is processed to supply the requested services and to maintain records of such interactions. The lawful basis for this processing is the performance of a contract between the individual and the organisation, and/or taking steps at the individual's request to enter into such a contract.
- Marketing Data includes information about preferences for receiving marketing communications from us and third parties, as well as individual communication preferences. This data is processed to enable participation in promotions such as competitions, prize draws, and free giveaways, to deliver relevant content and advertisements, and to measure or understand the effectiveness of advertising. The lawful basis for this processing is the organisation's legitimate interests, which include studying how customers use products and services, developing those products and services, growing the business, and shaping the marketing strategy.

We may use Customer Data, User Data, Technical Data, and Marketing Data to deliver relevant website content and advertisements (including Facebook ads and other display advertisements) and to measure or understand the effectiveness of the advertising served. The lawful basis for this processing is legitimate interests, specifically aimed at growing the business. Additionally, this data may be used to send other marketing communications. The lawful basis for this processing is either consent or legitimate interests (namely, to grow the business).

#### Sensitive data

We do not collect any Sensitive Data about you. Sensitive data refers to information that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, and information regarding your health, as well as genetic and biometric data. We also do not collect any information about criminal convictions or offences.

Where we are required to collect personal data by law or under the terms of the contract between us, if you do not provide the requested data, we may be unable to fulfil the contract (for example, delivering goods or services to you). If you fail to provide the necessary data, we may have to cancel the product or service you ordered; if this occurs, we will notify you at the time.

We will only use your personal data for the purpose for which it was collected or for a reasonably compatible purpose if necessary. For more information, please email us at <u>info@virtuallyedge.co.uk</u> If we need to use your details for an unrelated new purpose, we will inform you and explain the legal grounds for the processing

We may process your personal data without your knowledge or consent when required or permitted by law. We do not engage in automated decision-making or any form of automated profiling.



#### HOW WE COLLECT YOUR PERSONAL DATA

We may collect data about you when you provide it directly to us, such as by filling in forms on our website or sending us emails. Additionally, we may automatically collect certain data as you use our website through cookies and similar technologies. For more details, please see our cookie policy.

We may receive data from third parties, including analytics providers like Google and advertising networks such as Facebook, both of which are based outside the EU. This also includes search information providers, technical service providers, payment processors, delivery services, data brokers, and aggregators.

We may obtain data from publicly available sources, such as Companies House and the Electoral Register, which are based in the UK.

# MARKETING COMMUNICATIONS

Our lawful basis for processing your personal data to send you marketing communications is either your consent or our legitimate interests, specifically to grow the business.

Under the Privacy and Electronic Communications Regulations, you may receive marketing communications if (i) you have requested information about our services, or (ii) you have consented to receive marketing communications, provided you have not opted out since. For limited companies, we can send marketing emails without prior consent; however, you can opt out of receiving these emails at any time.

Before sharing your personal data with any third party for their own marketing purposes, we will obtain your express consent.

You can request that we or any third parties stop sending you marketing messages at any time by following the opt-out links included in our marketing messages or by contacting us at info@virtuallyedge.co.uk

Please note that if you opt out of receiving marketing communications, this opt-out will not apply to personal data provided through other interactions, such as enquiries or service requests.

#### DISCLOSURES OF YOUR PERSONAL DATA

- We may have to share your personal data with the parties set out below:
- Service providers offering IT and system administration services.
- Professional advisers, including legal, banking, auditing, and insurance services.
- Government bodies that require us to report on processing activities.
- Third parties to whom we may sell, transfer, or merge parts of our business or assets.



We require all third parties to whom we transfer your data to uphold the security of your personal information and handle it in compliance with the law. We permit these third parties to process your personal data only for specified purposes and in accordance with our instructions.

# INTERNATIONAL TRANSFERS

We are subject to the provisions of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, which safeguard your personal data. When we transfer your data to third parties outside the United Kingdom (UK) or European Economic Area (EEA), we ensure that specific safeguards are in place to provide a comparable level of security for your personal data. Specifically:

- We may transfer your personal data to countries that the UK government has approved as providing an adequate level of protection for personal data.
- If we engage US-based providers, we may transfer data to them if they implement safeguards such as Standard Contractual Clauses (SCCs) approved by the UK or other legally recognised mechanisms that provide equivalent data protection.
- When engaging with service providers established outside the UK and EEA, we may use approved standard contractual clauses, codes of conduct, or certification mechanisms to ensure that your personal data receives the same protection it has under UK data protection laws.

If none of the above safeguards are available, we may seek your explicit consent for the specific transfer. You have the right to withdraw this consent at any time.

#### DATA SECURITY

We have implemented security measures to prevent the accidental loss, misuse, alteration, disclosure, or unauthorised access to your personal data. Access to your personal data is restricted to employees and partners who require it for legitimate business purposes. They will only process your personal data in accordance with our instructions and are required to keep it confidential.

We have established procedures to address any suspected personal data breaches and will notify you and any relevant regulatory authority of a breach if we are legally obliged to do so.

#### DATA RETENTION

We will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, including meeting any legal, accounting, or reporting obligations.

In determining the appropriate retention period, we consider the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure, the purposes of processing, the possibility of achieving those purposes by other means, and applicable legal requirements.

For tax purposes, we are required by law to retain basic information about our customers (including contact, identity, financial, and transaction data) for six years after they cease to be customers.



In certain circumstances, we may anonymise your personal data for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## YOUR LEGAL RIGHTS

Under data protection laws, you have certain rights regarding your personal data, including the right to request access to, correction of, or erasure of your data. You also have the right to restrict or transfer your data, to object to its processing, and (where the lawful basis for processing is consent) to withdraw your consent.

#### You can find further details about these rights at:

#### ICO - Individual Rights

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

#### THIRD-PARTY LINKS

This website may contain links to third-party websites, plug-ins, and applications. Clicking on these links or enabling these connections may allow third parties to collect or share information about you. We do not have control over these third-party websites and are not responsible for their privacy policies. We encourage you to review the privacy notice of every website you visit after leaving our site.

#### COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.