

PRIVACY POLICY

BACKGROUND:

Vigo IT Solutions (“We, Us”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits this website, <https://vigoitsolutions.com/> (“Our Site”). As described in Parts 5 and 6 below, we do not collect personal data about you unless you contact us. Any personal data we do collect will only be used as permitted by law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Policy, you must stop using Our Site immediately.

1. Information About Us

Our Site is operated by White Space, a sole trader company based in Wirral.

Our Registered and Trading address is: The Lauries, 142 Claughton Road, Birkenhead Wirral CH41 6EY

Our Company is registered in England and Wales under Company number 6524110

Our Data Protection Officer is: Simon Richardson, Compliance Analyst.

Email address: compliance@vigoitsolutions.com

Telephone number: 0151 909 7160.

Postal Address: Vigo IT Solutions, The Lauries, 142 Claughton Road, Birkenhead CH41 6EY

2. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site, which may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

3. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable, living person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

a) The right to be informed about our collection and use of your personal data. This

Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 10.

- b) The right to access the personal data we hold about you. Part 9 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 10 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 10 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and if that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 10.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have those data.

Further information about your rights can also be obtained from the Information Commissioner's Office <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office <https://ico.org.uk/make-a-complaint/>. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first, using the details in Part 10.

5. What Personal Data Do You Collect?

Subject to the following, we do not collect any personal data from you. We do not place cookies on your computer or device, nor do we use any other means of data collection.

If you send us an email or use the contact form, we may collect your name, your email address, and any other information which you choose to give us.

6. How Do You Use My Personal Data?

If we do collect any personal data, it will be processed and stored securely, and for no longer than is necessary in light of the reason(s) for which it was first collected. We will

comply with our obligations and safeguard your rights under the Data Protection Legislation at all times. For more details on security see Part 7, below.

As stated above, we do not generally collect any personal data. If you contact us and we obtain your personal details from your email, we may use them to respond to your email.

Any and all emails containing your personal data will be deleted no later than 6 months after the reason for your email has been resolved or actioned.

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

We will not share any of your data with any third parties for any purposes other than storage on our email server.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 10.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7. How and Where Do You Store My Data?

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

Personal data security is essential to us, and to protect personal data, we take the following measures:

- Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means).
- All devices that connect to our system are encrypted, and we apply permissions to access our drives.
- The PCs are set up to automatically lock after a short period of inactivity, and our cloud back up system is encrypted end to end.
- We have developed company Disaster Recovery and Business Continuity Plans that are tested on a regular basis.
- Our staff receive data protection training through our Compliance team who are all GDPR Practitioner qualified and trained.

8. **Do You Share My Personal Data?**

We may share personal data with suppliers who provide us with services. For example, if you order something from us, your name and address will be shared with the delivery company. However, these activities will be carried out under a contract which imposes strict requirements on the supplier to keep your information confidential and secure.

Occasionally, where we partner with other organisations, we may also share information with them (for example, if you register to attend an event being jointly hosted by us and another organisation such as the Chamber of Commerce). We'll only share information when necessary and we'll make sure that we notify you first.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.

9. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 10. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

10. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Simon Richardson):

Email address: compliance@vigoitsolutions.com with 'Data Protection' as the email subject line.

Telephone number: 0151 909 7160.

Postal Address: For the Attention of Simon Richardson, Vigo IT Solutions, The Lauries, 142 Claughton Road, Birkenhead, Wirral C41 6EY.

11. **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This privacy policy was last updated on 20th September 2018.