



## DATA PRIVACY & COOKIES POLICY - 2021

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### 1. INTRODUCTION

This privacy notice gives you details of how RemoCo Virtual will collect and process your personal data within our business and through the use of our site [www.remocovirtual.com](http://www.remocovirtual.com), including information you may provide to us when you sign up to any of our marketing opt-ins or waiting list for services.

**RemoCo Virtual** are the data controller, and we are responsible for processing your personal data.

<b>Company Name</b>	RemoCo Virtual
<b>Email address</b>	info@remocovirtual.com
<b>Telephone number</b>	01622 933533
<b>Data Officer</b>	Julie Tyler
<b>Data Regulator</b>	Our Data Officer is registered with the ICO under number ZB094978 <a href="https://ico.org.uk/">https://ico.org.uk/</a>
<b>Data Retention Period(s)</b>	6 weeks after end of a booking or from removing yourself from our marketing lists
<b>Card and payment processor (3<sup>rd</sup> party) names and their security policy links</b>	Stripe <a href="https://stripe.com/docs/security/stripe">https://stripe.com/docs/security/stripe</a>
<b>Third parties we share information with:</b>	Associates contracted to RemoCo Virtual
<b>Date this Policy last updated</b>	August 2021

### 2. WHOSE INFORMATION DO WE COLLECT?

We process information about:

<b>"Clients"</b>	Client who have bought services from us, and "Client Contacts" who are individuals employed by or contracted to Clients;
<b>"Suppliers"</b>	Suppliers or potential Suppliers of goods or services to us;
<b>"Associates"</b>	Associates or potential Associates of services to us;
<b>"Prospects"</b>	contacts working at or connected with potential Clients;

### 3. OUR POLICY

We promise respectful treatment of the personal information of everyone we have contact with. We want it to be simple and clear.

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This Policy explains how we do that – when and why we collect information, how we use it, the situations when other people can see or use it, and how we keep it secure. We don't sell, rent or trade email lists with anyone else.

Whoever you are, our intention is to use your information to make things work smoothly for you in your experience of dealing with us. If that's not how it turns out for you, please make sure to contact us. It's best to put things in writing, which you can do by emailing the address above.

We keep this Policy under regular review, and we may revise it as time goes on. Please check back here from time to time to make sure you've got the latest information.

#### **4. OUR APPROACH TO PERSONAL DATA**

We're committed to protecting your privacy and honouring your legal rights to control how we use your personal data.

We only collect and use personal data when we need to

- because you have asked us to do something (for example, send you marketing);
- so that we can reply to queries or complaints;
- to develop and manage our business relationships;
- to help grow our business and fulfil our contracts;
- to provide services to clients;
- to calculate payments to associates or Affiliates/Referrers;
- to meet our legal obligations.

We try to make sure the information we hold is accurate and up to date and is no more than we need to have.

#### **5. CATEGORIES OF DATA**

The types of information that we will be processing depend on the nature of our relationship with you.

We may process information about you that you have yourself provided to us or published generally on the internet through social media or on other websites.

In all cases, we will have what identifying and communication information that is relevant and that we can sensibly obtain: that is, your name, email address, employer or business name, job title or position, contact address, social media addresses, and we may also capture some of the information published by you in your social media output to the extent that it may be relevant to our interactions.

If you are or work for a prospect, we will aim to obtain and process information that is relevant to our building a business relationship with you and doing business together, which may relate to your business and your personal interests.

If you are or work for a customer or supplier, we will also keep records of our interactions, the work we have done for you or commissioned from you, the progress of work, and financial and accounting records.

If we are processing information about you purely because we are providing services to others, please see Section D below. Please note that your rights may be subject to applicable exemptions.

If you have any questions or concerns about our use of your information, or how we have responded to any request about your personal data, please take it up in the first instance by emailing us at the above address.

If we can't sort it out, the official authority contact details are set out in the form above, and you can raise your concerns with them.

## 6. DOWNLOADS, NEWSLETTERS AND SERVICES

We monitor who opens what in our newsletter lists, and pre-set sequences of information we send you. We do this, so we can see if content is popular and generate more of it, or if it is not read.

There may be sub-routines that trigger if you click on links or articles. These are designed to offer you more information about things you are interested in.

You can unsubscribe from these sequences at any time.

**Existing Clients** may receive emails about specific offers relating to things you have already purchased. You can unsubscribe from these at any time.

We use automations (little sequences of emails that start when you ask for something in particular) to send you the information you asked for, to send you products you have bought and to administer services you have subscribed to. A lot of our onboarding for new products is by emails that send you hints and tips and little videos on 'how to'. You can unsubscribe from these at any time, but they don't go on for that long and you might want to wait for all the information as most people find it useful.

We monitor who reads our mailing and automations, how many times, and which links you choose to use and read. We use this information to increase the content's level of interest and help us improve what we send. You can remove your information from this monitoring by disabling **cookies** on your website browser before opening emails from us. From time to time, we contact individual email newsletter subscribers, but it is extremely rare.

We use anonymised data about you from time to time to target advertising campaigns based on profiling the sort of person who wants to receive information from us.

We ask our own sales and marketing people (both internal and external) to contact Prospects from time to time. This is normally because you have requested a call, or because we are actively trying to let you know about something you may benefit from.

## **7. SOCIAL MEDIA**

We have an active presence on social media. If you are using social media they are holding and using your information in accordance with their data privacy policy.

If you 'like' any of our posts or 'follow' us or contact us on social media we keep a record of that. Your replies to us, messages you send us, and your other activity linked to our posts may be seen by members of our staff and by our associates. Our contracts with them hold them to high standards of protecting your information.

## **8. NO SALE OR EXCHANGE OF YOUR DATA**

We do not sell or exchange your personal data with organisations who may want to sell you something or use your data for research or other purposes.

## **9. DATA LOCATION AND PLATFORMS**

Like most small businesses, we do not have any tailor-made software – we use mainstream packages for everything from our Client records, to email, to accounting.

This means that some of your data may be held in the EEA, and some may be held in services in the USA (with suitable data privacy shields) or elsewhere. We have picked mainstream suppliers with appropriate security standards.

## **10. WE MAY SHARE SOME OF YOUR DATA WITH THESE PEOPLE**

We have an outsourced support team for our own business which may include Virtual Assistants, Web Designers, IT support, Sales and Marketing, Accounting and more. They have limited access to your data, where the service they provide to us means they need it.

For example, if our IT support wants to check the functionality of a laptop or back up, they may need temporary access to information that may include something about you.

For example, if we invoice you, our Accountant needs to process the information in the invoice.

Our team use our software to access any data they need. We do not permit copying or sharing by the team and actively monitor for any potential breaches.

Your information/advice is held in the strictest confidence. Our team are all contracted to strict confidentiality clauses.

We restrict who can export or download data that is held to a limited number of individuals who are authorised to back up data.

If you want to know who is on our team, please email and ask us.

## **11. HOW LONG DO WE KEEP YOUR DATA FOR?**

Your information will be kept for the length of time set out in our retention period (see Section 1, Table, above).

If you subscribed to a newsletter or updates list, you will remain on the list(s) you joined until you unsubscribe from that list.

## **12. WANT TO SEE WHAT WE HOLD ON YOU?**

If you want to know what information we have about you (if any) email the address above and give us your name, email address(es). We may require you to confirm your identity before proceeding.

Provided we can legitimately disclose the information to you (see Section D), we will happily do a search and send you screenshots of what we have.

## **13. WHAT ARE YOUR RIGHTS**

You have the right to know what information we are collecting on you, and to amend it if it is inaccurate.

If you feel for some reason we have information we should not be keeping, or it is out of date or otherwise wrong, please let us know and we will take appropriate action.

Most of the information we hold is not based on your individual consent but is based on our needing the information to run our business and provide our products and services.

You have a "right to be forgotten" - but that does have some legal limits to it. If you want us to remove information about you, let us know. If you have been a Client, we may not be able to remove all data as we will have to ensure that we can continue to comply with legal, accounting, taxation and our insurer's requirements.

## **14. OUR LEGAL BASIS FOR PROCESSING YOUR DATA**

Signing onto our newsletter list is by your consent – and when you withdraw your consent we stop that processing of your data.

Apart from that, the information we hold is based on our needing the information to run our business and provide our products and services – either so we can perform our contract with you, or because we have a legitimate business interest in processing your data.

In a few situations we are processing personal data because we are under a legal obligation to do so. This principally relates to our business, accounting and tax records.

## 15. COOKIES POLICY

RemoCo Victual's website may gather information about your general Internet use by using cookies in order to help you personalise your online experience. Where used, these cookies are downloaded to your computer automatically. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

"Essential" cookies are automatically placed on your computer or device when you access our website or take certain actions on our website. 'Non-essential' cookies and other technologies are only placed on your computer or device if you have consented to us doing so. You consent to us placing non-essential cookies on your computer or device by continuing to use our website with your browser settings set to accept cookies.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use cookies for the following purposes:

**authentication** – we use cookies to identify you when you visit our website and as you navigate our website;

**analysis** – we use cookies to help us to analyse the use and performance of our website and services; and

**cookie consent** – we use cookies to store your preferences in relation to the use of cookies more generally.

Some of our service providers also use cookies and those cookies may be stored on your computer when you visit our website. These are the third-party service providers that store cookies when you visit our website:

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's Privacy Policy is available at: [https://www.google.com/policies/privacy/.](https://www.google.com/policies/privacy/))

**You have the ability 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.