



**VCI Systems Ltd.**

**Website & Services Privacy**

**Policy**

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## Document History

Date	Version	Author	Comments
6 <sup>th</sup> March 2018	0.1	CA / RC	Initial version

## Introduction

VCI Systems Ltd. (VCI) is committed to ensuring the privacy of any personal data you submit through the use of our website ([www.vcisystems.co.uk](http://www.vcisystems.co.uk)) and when using our services.

This policy will explain how we use any personal information we collect about you, the choices you have about how we use that information, the choices you have regarding our communications with you and the marketing offers that you want to be sent.

This privacy notice was drafted with conciseness and clarity in mind. It does not provide an exhaustive list of all aspects of VCI's collection and use of Personal Data. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

By visiting our website ([www.vcisystems.co.uk](http://www.vcisystems.co.uk)) and using our services, you are accepting and consenting to the practices described in this policy. You can withdraw consent at any time by contacting us using the contact details listed below.

## Who we are

Your personal information is held by VCI. VCI is considered to be the 'Controller' of that information.

If you have any questions about our privacy policy or information we hold about you, please contact us:

- By email at: [privacy@vcisystems.co.uk](mailto:privacy@vcisystems.co.uk)
- In writing to:  
VCI Systems Ltd,  
22c Horseshoe Park,  
Pangbourne,  
Berkshire  
RG8 7JW
- Or, using our online enquiry form: <https://www.vcisystems.co.uk/contact-us/>

## Information we collect

Personal data is anything which identifies you as an individual, either on its own or by reference to other information.

We may collect the following data about you:

- Information that we collect from you: such as name, email address, postal address, postcode, job title, daytime and/or mobile phone number and information about your workplace and the nature of your business.
- Information we collect about you: we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. Such information can include information such as visitor traffic to the site and various pages within the site, Internet Protocol (IP) addresses, geographic locations, browser type, link clicks and other page interaction information. This information is processed in a way which does not identify

anyone and we do not make any attempt to find out the identities of those visiting our website.

- Information we collect from newsletter emails: we use MailChimp to deliver our marketing emails and newsletters. When we send an email to you, we may track whether you opened that email and whether you have clicked any links contained within. This information helps us to measure the effectiveness of our email campaigns. We also monitor emails sent to us, including file attachments, for viruses or malicious software.
- Any other information that you choose to send us.

## Sensitive Personal Data

Sensitive personal information is defined as personal information from which we can determine or infer an individual's racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, membership in a trade union or professional association, physical or mental health or condition, genetic data, sexual life or judicial data (including information concerning the commission or alleged commission of a criminal offence).

When you contact VCI on this site, via email or via contacting the office, you do not have to provide us with sensitive personal information.

If you are being asked to provide sensitive personal information this may be fraudulent so please check with us before giving any such information.

## Use of Personal Data

We use your company/personal information for the purposes of:

- dealing with your enquiries and requests;
- supporting your business and delivering the services you request;
- administering your customer account, and to support other general business activities;
- providing you with information that may be of interest to you, such as our newsletters and articles;
- providing, developing, improving and personalising our services and our website;
- generating anonymous reports about use of the website and its features;
- satisfying legal or regulatory requirements; and/or
- as otherwise described in this policy.

## Marketing Communications

We would like to send you information and articles, including those about products and services, which we believe will be of interest to you.

If you have consented to receive marketing communications, you may opt out at a later date and have the right at any time to stop us from contacting you for marketing purposes.

If you no longer wish to be contacted for marketing purposes, you can simply unsubscribe at the bottom of the mailing, contact us by email or write to us at our registered office address, which is listed at the top of this privacy policy.

## Sharing your Personal Data

VCI may pass your Personal Data to third parties to process work on its behalf. VCI requires all third parties to process the information based on our instructions and in compliance with the requirements of the GDPR.

VCI may also disclose your Personal Data in order to comply with legal and regulatory requirements, including to law enforcement and credit agencies for the detection and prevention of financial crime.

On occasion, it may be necessary to disclose some of your Personal Data to VCI's auditors to the extent necessary to enable them to perform their duties as auditors and to VCI's insurers and accountants.

Whenever we share information, we do so in line with our obligations to keep that information safe and secure.

## Retaining your Personal Data

We keep company/personal data:

- For as long as is necessary to fulfil the purposes for which it was we collected;
- As required by law; or
- To enforce or defend legal claims.

The length of time that information will be retained will vary depending on the obligations that we need to meet.

Information that is no longer needed will be destroyed securely or anonymised (i.e. can no longer be identified as being your Personal Data).

## Your rights over your Personal Data

You have rights as an individual which you can exercise in relation to the information we hold about you. These rights are listed below:

- You can ask us what information we hold about you and verify the lawfulness of the processing.
- You can ask us to give you a copy of the information we hold about you.
- You can ask us to rectify/amend your personal data if it is inaccurate or incomplete.
- You can ask us to erase information that we do not have to retain otherwise for overriding regulatory, contractual or health and safety purposes.
- You can ask us to stop using your information if you are concerned about the accuracy of the information or if you believe we are not doing so lawfully.
- You can ask us to send your personal data in electronic format to another data controller.
- You have the right to object to us processing your information, if done so for legitimate interests, the performance of a task in the public interest (including profiling), direct marketing or processing for scientific/historical research and statistics.

If you would like to request a copy of any information that we currently hold about you, or to exercise any of the rights listed above, you should direct any such request to VCI in writing to our office address listed at the beginning of this policy.

In the event that you wish to exercise the right to request erasure of your Personal Data (“the right to be forgotten”) held by VCI, we retain the right to decline such a request if it falls within one of the exclusions stated in Article 17(3) of the GDPR, such as compliance with a legal obligation.

Please note, while we may restrict the processing of your Personal Data in line with your request, we may add your Personal Data (name and address) to a ‘suppression list’ to ensure we do not send any communications in the future.

## Protecting your Personal Data

We take information and system security very seriously.

Any personal information which is collected, recorded and processed by VCI, whether paper copies or digital copies, will be treated in confidence and will have appropriate safeguards to protect that information against any unauthorised or accidental disclosure, access or deletion.

VCI will take appropriate technical and organisational measures to manage risk to the confidentiality, integrity and availability of your Personal Data.

## Processing and storing your Personal Data

VCI holds data at a secure server site in the UK. VCI does not store any Personal Data outside the European Economic Area (EEA).

Some information may be processed by third parties we work with outside of the EEA, including companies in the United States.

When information is being processed outside of the EEA, we will take all steps reasonably necessary to ensure that your data is treated securely and provided with an equivalent level of security as would be applied by UK / EEA data privacy laws.

## Cookies

Cookies are small text files that can be used by websites to make a user’s experience more efficient. They cannot harm your computer.

Like most websites, our site ([www.vcisystems.co.uk](http://www.vcisystems.co.uk)) uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer’s IP address which could be used to personally identify you but Google do not grant us access to this.

GA makes use of cookies. Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within our website.

## Links to other websites

Our website may sometimes contain links to other websites or contain functionality to enable sharing articles via third party social media applications, such as Facebook and Twitter 'share' buttons. This privacy policy does not cover the links within this site linking to other websites. We encourage you to read the privacy policies on the other websites you visit before submitting any Personal Data to those sites.

## Your right to complain

We aim to collect, use and safeguard your Personal Data in line with current data protection laws. If you believe that your information has been mishandled, you should contact us at our office, listed at the top of this privacy policy, so that your complaint can be fully investigated.

If you are not satisfied with our response or you still have a complaint about our use of your information, you can contact the Information Commissioner's Office via their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or write to them at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

## Changes to this Privacy Policy

We keep our privacy policy under regular review and may update it from time-to-time by posting a new version on our website. We recommend that you check this page regularly. Continued use of the website and our services will indicate your acceptance of any changes.