

## Privacy Policy

### 1. Introduction

This privacy notice provides you with details of how I collect and process your personal data through your use of my site **www.workflowva.com** including any information you may provide through my site when you purchase a product or service, sign up to my newsletter or take part in a prize draw or competition.

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

**I, Louisa van Vessem**, am the data controller and I am responsible for your personal data (referred to as "I" and "my" in this privacy notice).

### Contact Details

My full details are:

Full name of legal entity: Louisa van Vessem trading as Workflow Virtual Assistant

Email address: [Louisa@workflowva.com](mailto:Louisa@workflowva.com)

Postal address: Kentmere Drive, Blackburn, Lancashire BB2 5HF

Telephone number: 07875 652 982

If you are not happy with any aspect of how I 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](http://www.ico.org.uk)). I would be grateful if you would contact me first if you do have a complaint so that I can try to resolve it for you.

It is very important that the information I hold about you is accurate and up to date. Please let me know if at any time your personal information changes by emailing me at [Louisa@workflowva.com](mailto:Louisa@workflowva.com).

### 2. What data do I collect about you?

Personal data means any information capable of identifying an individual. It does not include anonymised data.

I may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.
- **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
- **Financial Data** may include your bank account and payment card details.
- **Transaction Data** may include details about payments between me and other details of purchases made by you.
- **Technical Data** may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Profile Data** may include your username and password, purchases or orders, your interests, preferences, feedback and survey responses.
- **Usage Data** may include information about how you use my website, products and services.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from me and third parties and your communication preferences.

I may also process Aggregated Data from your personal data but this data does not reveal your identity and

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as such in itself is not personal data. An example of this is where I review your Usage Data to work out the percentage of website users using a specific feature of my site. If I link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data.

## Sensitive Data

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

Where I am required to collect personal data by law, or under the terms of the contract between me and you do not provide me with that data when requested, I may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide me with the requested data, I may have to cancel a product or service you have ordered but if I do, I will notify you at the time.

## 3. How I collect your personal data

I collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms on my site (or otherwise) or by communicating with me by post, phone, email or otherwise, including when you:
  - Order my products or services;
  - Create an account on this site;
  - Subscribe to my service or publications;
  - Request resources or marketing be sent to you;
  - Enter a competition, prize draw, promotion or survey; or
  - Give me feedback.
- **Automated technologies or interactions:** As you use my site, I may automatically collect Technical Data about your equipment, browsing actions and usage patterns. I collect this data by using cookies, server logs and similar technologies. I may also receive Technical Data about you if you visit other websites that use my cookies. Please see my cookie policy for further details.
- **Third parties or publicly available sources:** I may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties
  - Analytics providers such as Google based outside the EU
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

## 4. How I use your personal data

I will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where I need to perform the contract between us.
- Where it is necessary for my legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where I need to comply with a legal or regulatory obligation.

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Generally, I do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing me at **Louisa@workflowva.com**.

### Purposes for processing your personal data

Set out below is a description of the ways I intend to use your personal data and the legal grounds on which I will process such data. I have also explained what my legitimate interests are where relevant.

I may process your personal data for more than one lawful ground, depending on the specific purpose for which I are using your data. Please email me at **Louisa@workflowva.com** if you need details about the specific legal ground I are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a prospective client/associate	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to me	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for my legitimate interests to recover debts owed to me
To manage my relationship with you which will include: (a) Notifying you about changes to my terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for my legitimate interests to keep my records updated and to study how customers use my products/services
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for my legitimate interests to study how customers use my products/services, to develop them and grow my business
To administer and protect my business and my site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for my legitimate interests for running my business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation

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To deliver relevant content and advertisements to you and measure and understand the effectiveness of my advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for my legitimate interests to study how customers use my products/services, to develop them, to grow my business and to inform my marketing strategy
To use data analytics to improve my website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for my legitimate interests to define types of customers for my products and services, to keep my site updated and relevant, to develop my business and to inform my marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for my legitimate interests to develop my products/services and grow my business

## Marketing communications

You will receive marketing communications from me if you have:

- (i) requested information from me or purchased goods or services from me; or
- (ii) if you provided me with your details and ticked the box at the point of entry of your details for me to send you marketing communications; and
- (iii) in each case, you have not opted out of receiving that marketing.

I will get your express opt-in consent before I share your personal data with any third party for marketing purposes.

You can ask me or third parties to stop sending you marketing messages at any time by emailing me at [Louisa@workflowva.com](mailto:Louisa@workflowva.com) at any time.

Where you opt out of receiving my marketing communications, this will not apply to personal data provided to me as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## Change of purpose

I will only use your personal data for the purposes for which I collected it, unless I reasonably consider that I need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email me at [Louisa@workflowva.com](mailto:Louisa@workflowva.com).

If I need to use your personal data for a purpose unrelated to the purpose for which I collected the data, I

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will notify you and I will explain the legal ground of processing.

I may process your personal data without your knowledge or consent where this is required or permitted by law.

### 5. Disclosures of your personal data

I may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Service providers who provide IT and system administration services.
- Team members that I outsource work to including other Virtual Assistants.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom I sell, transfer, or merge parts of my business or my assets.

I require all third parties to whom I transfer your data to respect the security of your personal data and to treat it in accordance with the law. I only allow such third parties to process your personal data for specified purposes and in accordance with my instructions.

### 6. INTERNATIONAL TRANSFERS

Countries outside of the European Economic Area (**EEA**) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria.

Many of my third parties service providers are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever I transfer your personal data out of the EEA, I will do my best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- I will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where I use certain service providers, I may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where I use providers based in the United States, I may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, I may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

Please email me at [Louisa@workflowva.com](mailto:Louisa@workflowva.com) if you want further information on the specific mechanism used by me when transferring your personal data out of the EEA.

### 7. DATA SECURITY

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I have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, I limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on my instructions and they are subject to a duty of confidentiality.

I have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where I am legally required to do so.

## 8. DATA RETENTION

I will only retain your personal data for as long as necessary to fulfil the purposes I collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, I consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which I process your personal data and whether I can achieve those purposes through other means, and the applicable legal requirements.

By law I have to keep basic information about my customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask me to delete your data: see below for further information.

In some circumstances I may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case I may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email me at [Louisa@workflowva.com](mailto:Louisa@workflowva.com).

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

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I may need to request specific information from you to help me 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. I may also contact you to ask you for further information in relation to your request to speed up my response.

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

## **10. THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. I do not control these third-party websites and are not responsible for their privacy statements. When you leave my website, I encourage you to read the privacy notice of every website you visit.

## **11. 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 I use, please see my cookie policy.