

## Who We Are & What This Is

VPW Systems (UK) Ltd is a UK based IT Services & Support Provider, registered company 4788617, registered in England and Wales, with ICO registration number Z8908815. The information in this Privacy Policy applies to all our activities unless otherwise notified to you.

### Important:

Nothing in this document removes your need to have policies and ensure you have suitable measures for compliance in how you handle data stored on our services which you use, rather than data we hold about you for our use. These are classified differently and there are obligations on you as well as us which you should take advice on – we cannot advise you on this.

## Key Reasons we store data:

To make life easier for those assessing compliance, we've summarised the key reasons and which GDPR lawful basis we use for processing this data:

### ■ Technical Delivery of Services

We need logs and other technical data to provide, support and supply our service. We also need to be able to monitor, secure and manage our services, and some data is required to do this. We do this under article 6(f) – legitimate interests, article 6(c) – necessary for compliance with legal obligations, article 6(b) – necessary for performance of a contract.

### ■ To provide the services in non-technical ways

For example, so we can provide information to you, invoice you for services, monitor payments, statements and accounting functions. Offer customer service and other non-support and support related assistance. We also need to hold some data such as accounting records for legal

reasons (for example VAT, companies house compliance etc). We do this under article 6(b) – contract delivery, article 6(f) – legitimate interests, article 6(c) – compliance with legal obligations

### ■ Staff Training, Monitoring and Quality Monitoring

We may record our phone calls, verbal conversations, written correspondence in both original and/or summarised formats. We do this under article 6(f) – legitimate interests and 6(b) contract delivery

### ■ Protecting Us – Legal Risks

We may need to use data we hold to prove we are adhering to our contractual obligations, legal duties or obligations put upon us and to defend and protect our legal rights as necessary. For example, we may need to process data to defend ourselves or enforce our contracts and legal rights. We use article 6(f) for this – legitimate interests

### ■ Providing Data to law enforcement, suitably authorised agencies, regulators and courts

We may from time to time be compelled, obligated or need to provide some data for these reasons. We are using article 6(c) for this – legal obligations

### ■ Security of our Services, Systems, Employees and Customer Data & our Premises/Facilities & Equipment

We may need to record and use data we obtain from equipment and systems, including CCTV, call recordings, access logs, authentication data and other sources to defend and protect our systems and services, as well as our premises and employees, as well as customer data. We do this under article 6(f) – legitimate interests and article 6(b) – delivery of our contracts. In limited cases we may process under article 6(d) vital interests to protect our staff or that of a customer.

## Where We Store Data

**Summary:**

We store all data in the UK and only disclose the most limited data we can where we must do so (typically to provide a service to you).

It's our policy to hold data only within United Kingdom. We do this on equipment that we operate and control in almost all cases, and actively try to avoid having your data stored on third party systems to help us ensure the security and integrity of the data we do store.

We do from time to time need to make limited disclosure of some of your personal data in order to provide our services to you – for example if you order connectivity services, we might need to provide limited contact information or address information so we can arrange for lines to be installed on our behalf and thus need to disclose some information. We only do this for legitimate purposes in providing quotes, delivering services and supporting you.

## What do we store for our use?

**Summary:**

We mostly store Personal Details – typically including names, addresses, phone numbers, e-mail addresses are often stored by us – we need them to support you, troubleshoot, invoice you for services and other legitimate purposes. You might also give us personal information in the course of normal business practice in order to deliver the services we provide to you.

Typically we will store information that relates to individuals in order that we can contact people we provide services to, deliver support, and generally provide the services you take from us. We'll also store such information so we can protect your account from compromise by allowing us validate the identity of people we speak to etc.

This will include: Contact Names, Phone Numbers, Postal Addresses, E-Mail Addresses and related

information. It may also include some technical data – such as IP Addresses, Usernames, Passwords, Computer Identity, Site Information and other data we need to assist you.

**We will store:**

- Organisational Data – Company Names, Registration Numbers, Director Information and other information we need to identify customers, perform credit checks etc.
- Information relating to individuals who are associated with an organisation – typically employees (you must ensure you have appropriate policies when disclosing this information to us).
- Information relating to equipment, products and software which may be connected with, tagged to, or otherwise associated with an individual
- Correspondence – regardless of the means it arrives with us, but including at least electronic, verbal, and written communications, which can include relevant personally identifiable information. This could be an e-mail, messages on our Helpdesk, or otherwise provided to us.

## If we provide services to you (or an organisation you're associated with):

To provide our service including provisioning, maintenance and support of those services we may need to record, log and store information that allows us to do so. This can include either directly personally identifiable information or information that can be reasonably combined to identify an individual.

For example, we may store technical data such as domain names, IP Addresses, machine identities and so on, in addition to the more obvious personal information such as names, addresses etc. We must do this in order to provide our service.

Some of that data will be stored continually whilst any agreement exists with us (and in some cases for a

period of time afterwards). Some of that data would be held for a more limited time. The timings vary based on combinations of any legal obligations we may have, general operational policies and practical limits. We only hold data we reasonably need to in order to deliver our obligations to customers, manage security, maintain good record keeping and efficiently perform our duties under any contracts or agreements we may have.

It is also worth remembering that we can, and do, store information about other people that you might communicate with which identifies another individual. For example, if you take an e-mail service from us, we will need to know, store and handle the e-mail addresses of people you send mail to so we can actually send the message, or help you trace a missing message. We don't use this data for any purpose beyond providing and supporting the service.

## When we might hold data about you despite you not being a customer:

We may sometimes hold data for someone who is not actively a customer of ours (e.g. has no contract for services with us). We can do this for a few reasons, such as:

- Where you or someone associated with your organisation has asked us to get in touch to provide our services and/or provide a quotation, if you're working with our customer to triage or co-troubleshoot a problem or similar
- If our customer uses a service where to operate that service we might store your information – for example one of our customers e-mailing you.
- Where one of our customers stores data about you on a service we provide. Please be aware that we cannot assist with this as we are not processing that data directly and we may not even know it is stored or have direct access to it. You must ask the organisation responsible to help if you have any privacy or data compliance concerns.

## Privacy and our Web Site(s):

### Summary:

When visiting our web site, limited information is collected for diagnostic, troubleshooting, and analytics purposes. Whilst analytics can identify that someone has visited us, or visited more than once and so on, it is not the case, unless you choose to contact us online, thus disclosing your identity to us that we would actually know which person visited us.

If you visit any of our web sites, we may store and collect a limited amount of information that helps us identify how the sites are used, if there are problems etc. Unless you also choose to identify yourself, we wouldn't know it was you. You could identify yourself by submitting a contact form of similar, or logging into a service we provide on the web site(s) etc.

We may choose to use Cookies to store information – either for analytics purposes, or to help you use the service or site better. Our analytics and diagnostic and monitoring logs will store information such as IP addresses used. It is possible in some limited situations that we could identify an individual by combining this information although we would not usually do so with intent as we have no direct reason to do so

### Note:

If you sign up to any of our services, for a trial or paid subscription you'll need to understand, and will, by doing so, give us a reasonable cause to use that data in association with those services. It doesn't mean we can use the data for "any" reason without further consultation with you (and we won't!) – for example we can't – and won't start sending you marketing!

## Other circumstances that we process data:

There are a few circumstances where we might hold, process and/or disclose information that is rare and not something that happens every day:

- If we sell any part of our business, or contract a third party to provide, run or support any service or product, we might transfer that information. We would notify you in the event of a service transfer or business sale, and in all cases if we ever were to hold data outside of the United Kingdom.
- If we are required to do so in order that we can maintain our contractual agreements with you, we need to enforce our terms and conditions and disclose some information to do so.
- If we believe that the safety of our employees, contractors, or even the general public is at risk if we do not disclose information
- To perform credit or identity checks where required by law, to protect us and/or our suppliers, customers, insurers or other interested party,
- Where we're required to be legally compliant, are compelled to by law, court or other suitable legally binding scenario.

## Opting In for Marketing:

### Summary:

You will never be added to any marketing lists by us unless you have explicitly decided to receive them. You can remove yourself at ANY time without a reason. We may provide various methods to manage, add or remove such subscriptions. You don't need to have services with us, and by having services this won't mean you just receive marketing regardless! We do send non-marketing communications – such as to let

you know about a service issue or product improvements but this is not classified as marketing.

We will not send any marketing material (by which we mean promoting our products or services) to you unless you have explicitly chosen to receive so. You would normally do this by one (or more) of the following situations occurring:

- You've become a customer of ours, and have made a clear choice to receive such communications (any sign up forms would specifically ask you in a clear way). It is not conditional on having our services, mandatory or in any way a problem if you don't want to (other than just not being told about anything we can offer you unless you contact us first to discuss options).
- Completing an online sign up where you specifically choose to receive communications from us that are for marketing purposes and clearly marked as such when you choose to receive them
- Signing up to newsletters or marketing from us, for example visiting a section of our web site

### Remember:

We may also communicate with you with no marketing purpose where we have a reasonable cause. For example, if you take an e-mail service from us, we may contact you to let you know about maintenance of the service or technical changes that are going to happen which could affect that service.

## Data on other Individuals:

Where you provide information to us relating to another individual (for example an employee), it is your

responsibility to ensure you have the right to pass that information to us. It is also your responsibility to ensure that they're aware of our Data Protection Policies and they understand the reason the data has been disclosed and how it will be used and what relevant options they have for this to be removed or amended.

## Transmission of Data

For data you provide to us, we make efforts to keep that data secure and avoid unintended further disclosure. However, some communication mediums and technical scenarios mean we cannot always encrypt or take other technical measures to secure your data. You should ensure you understand how data can be utilised and if you have any concerns contact us for further advice.

We take a number of technical measures to protect our systems, services and ultimately the data we store, and we provide more information on specific measures in other documents. If you have specific requirements, you must ensure you discuss with us and get explicit written agreement. Unless we agree in writing the technical standards we meet will be as documented by us and varied as appropriate as we make changes. For security, we may require non-disclosure agreements to discuss some aspects of our security arrangements. We reserve the right to decline information requests on the systems we use if we believe disclosure could put our systems and data at risk.

Where you transmit any data using our services, you are solely responsible for ensuring you have picked an appropriate medium to do so, and that the transmission will not cause any breach of data privacy or storage.

## Data Retention

For data held by us and used by us for the normal course of our business, we will retain information for variable amounts of time – sometimes on an indefinite basis. Some we will be required to retain by law, sometimes we'll do so for contractual reasons – as the

types of data we store can vary significantly, so too will the retention period. If you have specific queries or concerns, our Customer Services Team should be your first point of contact.

For data stored on our systems used by you with services we provide, we will hold the data continually whilst we need to, or you choose to. If you for any reason stop using our services we will remove that data at our earliest reasonable opportunity. If we held the data for this reason alone, once you stop using our services (whether by termination by you or us, by default, mutual consent or natural expiry of an agreement) we will remove it from all systems – including live and backup systems. This typically happens within 30 days (it can be faster with some services). We would always expect any data to be gone after 3 months in the worst case scenario.

## Subject Access Requests & Contacting Us in relation to Data Protection & GDPR

You have a right as an individual to ask us for personal information in some circumstances, and may have reasonable cause to make a subject access request to us. We can only provide this on a one to one basis – e.g the person requesting the information must also be the person whom the data is about (unless suitable lawful authority is provided otherwise). Should you wish to do this, or for any other purposes of Data Protection, Privacy and Data Protection queries, our routine contact information is as follows:

Phone: 0845 003 8114

E-Mail: [customerservices@vpwsys.net](mailto:customerservices@vpwsys.net)

You may also write to: VPW Systems (UK) Ltd, Customer Services, PO BOX 230, Exeter, Devon, EX2 8WQ.

We will acknowledge your request within 3 working days of receipt, and will aim to respond as soon as we

can – or within the time permitted under UK Law as appropriate.

You may be asked to provide verification or identification in order for us to be satisfied that we have the right to provide information to you, or act upon your request. If you cannot do so, we have the right to refuse your request. Please make sure you are clear about the information you're asking for and your identity.

## Removing Your Data

In some cases you might have a right to have us remove data we hold about you. This is particularly likely if you gave us that data under consent (for example if you made a choice to receive marketing information from us). You should ensure you understand when we are obliged to do this, when we might agree to do so even though we're not obliged to do and when we cannot remove wholly or partially your information. Where the requirements are met we will remove such information. Please remember that if we hold the data on behalf of a customer, you must ask them.

## Data Portability

In some cases you might have a right to data we hold about you to be provided so you can take it elsewhere. In limited situations where this applies, we confirm that we would honour reasonable requests. Please note that if the data you are referring to relates to data we did not obtain for our use, but is stored by a customer on our services, you must ask them.

## Security Vulnerabilities:

If you believe that you've identified any security issue or vulnerability with any service we provide, we are grateful that you're taking the time to notify us. If you're an existing customer, please make contact with us in the

usual way. If you're a third party (for example a security researcher), please contact us as follows:

E-Mail: [networkoperations@vpwsys.net](mailto:networkoperations@vpwsys.net)

Please note that we cannot answer any routine support queries via that address and they will be ignored.

## Misuse of our services:

Please contact our Security Team so that we can investigate. Please be prepared to provide evidence, such as time stamped logs, any information that helps us identify the customer, product, service or connection in use, and the reason you believe they are abusing our services. Please submit by e-mail to: [securityalerts@vpwsys.net](mailto:securityalerts@vpwsys.net)

## Changes to this Policy

This policy (CS106) is subject to change from time to time. We publish the latest version of this on our web site at [www.vpwsys.net/legal/](http://www.vpwsys.net/legal/) and you may also ask for a copy from our Customer Services Team. If we make any changes to it that materially affect you, other than where we are lawfully required to make such a change, we will endeavour to make you aware of the change, but you should ensure you take your own measures to keep up to date with any changes.

## Need more information?

In some cases you might require or need further information than is in this policy. Please submit your requests or requirements by e-mail to our Customer Services Team (see elsewhere in this document for contact information). We will evaluate your request on a case by case basis. For security, you may be asked to provide additional information, confirm your identity or be asked to sign a non-disclosure agreement should your request concern specific security measures or other information that could threaten us, or our customers, services or data.