

## **Privacy Policy**

At Vega, we respect your privacy. As a result, is it our desire to be as transparent as possible with you on how we collect and use any data that may be collected as a result of your engagement with us as a client, freelancer or supplier and as a follower of our work. This privacy policy will give you an overview of what we collect and how we collect this data and your rights on how this information is controlled. Vega can assure you that we will not sell your data to any third parties, although information may be shared with third parties from time to time as part of our ongoing operations.

Please read this policy carefully to understand more about the information we may collect, use and share.

#### Your Information

Personal information is any information that can be used to identify you or that we can link to you. Our privacy policy explains:

- the personal information we collect from you, either directly or indirectly;
- how and why we use it;
- who we share it with;
- the rights to which you may be entitled;
- your choices about how we use your personal information.

#### Information you provide to us

We collect information that you voluntarily provide to us, such as your name, phone number and email address. This happens, for example, when you subscribe to a mailing list, meet one of our employees and exchange a business card or when you contact one of our offices. We may also obtain information from individuals in their capacity as representatives of organisations, including business contact details and other personal information relating to those individuals.

Information we collect automatically – (Cookies)

We may collect some information about you using cookies or other similar technologies when you browse our website or if you open or click on links in electronic communications from us.

This information is stored in a password protected third party CRM. Our Landlord (XYZ Spinningfields) operates a video security system in each of our offices. Images captured may be automatically stored and can be accessed when required for security purposes. This processing is necessary to protect our legitimate interests.

#### Information collected from other sources

We may receive information about you from other sources, including payment processing companies, your bank, credit reference agencies or data brokers. We may also receive information about you from social media platforms, for example when you interact with us on such platforms.

## Why we collect your information and for how long do we retain this information.

We collect and use your information for a variety of reasons. We need some information to enter into and perform a contract with you – for example your contact and payment details and this will be collected and agreed as part of our on-boarding process.

Some information processing is required by law or in the public interest including making sure we verify our customers' identities.

Some information is processed because you have given your consent to that, which can be withdrawn at any time via a data deletion request to our Data Controller via hello@vegacomms.co.uk



We collect other information because we have legitimate business interests in doing so, for example, in:

- Researching, analysing and improving our services;
- Maintaining a public profile on both traditional and social media;
- Providing security over our business and who we trade with; or
- Developing and maintaining relationships with vendors, partners and other companies and dealing with individuals who work for them in our sector.

We will keep your information for as long as it is reasonably necessary. How long depends on factors such as whether you have any contractual agreements in place with us or have interacted with services. We will also routinely refresh our information to ensure we keep it up to date, so you may also receive preference emails from us from time to time to ensure that your data is up-to-date and relevant to your needs.

## Legal requirements

We need to collect certain types of information to allow us to comply with legal requirements relating to our anti-fraud / anti-money laundering / know your customer obligations. If this information is not provided we cannot provide you with a product or service. Your personal information may also be processed on reasonable request by a law enforcement or regulatory authority, body or agency or in the conduct or defence of a legal claim. We will not delete personal information if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

#### How we use your Information

We use the information we collect to provide you with relevant information about the services we offer and to communicate with you, including, for example, informing you about new case studies and service offerings. We also use information for business operations, security, safety and dispute resolution.

## Communications, Marketing and Advertising

We use data that we collect to deliver and personalise our communications with you. We may, for example, contact you by email or by other means of electronic communication (including by social media platforms) to inform you about any news from Vega or to invite you to attend events hosted or sponsored by Vega.

#### Information we Share

There are certain circumstances where we may transfer your personal data to employees, contractors and to other parties.

- We may share your information with certain contractors or service providers. Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide to them, including your information, will only be provided in connection with the performance of their function.
- We may also share your information with certain third parties. We will do this either when we receive your consent or because we need them to see your information to provide products or services to you. These include credit reference agencies, anti-fraud databases, screening agencies and other partners we do business with.

Your personal information may be transferred to other third-party organisations in certain scenarios:

• If we are required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police;

Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

## Where your information will be held

We store our information on computer systems and hard copy files held by Vega both on premises and via third party (secure) data systems such as CRM software and Data Analytics' systems.



We will only transfer data to jurisdictions outside the scope of the European General Data Protection Regulation (GDPR) where the appropriate safeguards set out in the GDPR are in place.

## **Your Rights**

You may have certain rights in relation to your information including a right to access or to correct the information we hold on you. We have listed the rights you have over your information and how you can use them below.

These rights will only apply in certain circumstances. They will generally not be available if there are outstanding contracts between us, if we required by law to keep the information or if the information is relevant to a legal dispute.

- You can remove consent, where you have provided it, at any time.
- You can ask us to confirm if we are processing your information.
- You can ask for access to your information.
- You can ask to correct your information if it is wrong.
- You can ask us to delete your information.
- You can ask us to restrict how we use your information.
- You can ask us to help you move your information to other companies.
- To help with that, you have a right to ask that we provide your information in an easily readable format to another company.
- You can ask us to stop using your personal information, but only in certain cases.
- You have the right to complain to the relevant supervisory authority.

#### Changes to the Policy

This policy is kept under review and will be changed from time to time, to find out more information, please have a look at our full policy.

# Security

We are committed to keeping your personal information safe. We have put in place physical, technical and administrative measures to prevent unauthorised access or use of your information.