

VIRTUAL ADMIN UK

PRIVACY POLICY



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1. DEFINITIONS

- 1.1. **'Client'** means a person, firm or corporate body who enters into a Contract with the Company by acceptance of the Terms and Conditions of Service for the provision of Services together with our Privacy Policy.
- 1.2. **'Associate'** means a person to whom the Company outsources work to in accordance with our Terms and Conditions of Service.
- 1.3. **'Company'** means Virtual Admin UK who are responsible for the provisions of the Service and the retention of Personal data.
- 1.4. **'Business purposes'** means the purposes for which Personal data may be used by the Company, e.g. personnel, administrative, financial, regulatory, payroll and business development purposes:
- 1.5. **'Personal data'** means information relating to identifiable individuals, such as job applicants, current and former employees, clients, suppliers and marketing contacts. This includes expression of opinion about the individual and any indication of someone else's intentions towards the individual;
- 1.6. **'Sensitive personal data'** means Personal data about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, sexual life, criminal offences, or related proceedings. Any use of Sensitive Personal data must be strictly controlled in accordance with this policy;
- 1.7. **'Processing data'** means obtaining, retaining, processing or doing anything with data, such as organising, using, altering, retrieving, disclosing or deleting it.
- 1.8. **'Consent'** means granting permission for the Company to obtain, retain and process your Personal data for business purposes.

2. INTRODUCTION

- 2.1. This document refers to Personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject).
- 2.2. The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects. These rights cover the safeguarding of Personal data, protection against the unlawful processing of Personal data and the unrestricted movement of Personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.
- 2.3. The Company, holds Personal data about job applicants, Associates, Clients, suppliers and other individuals for a variety of business purposes.
- 2.4. This policy sets out how the Company seeks to protect Personal data and ensure staff understand the rules governing their use of Personal data to which they have access in the course of their work.
- 2.5. All work is treated with the highest degree of confidentiality.

3. PERSONAL DATA

- 3.1. Under the EU's General Data Protection Regulation (GDPR) Personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".
- 3.2. Article 4(11) of the GDPR states that (opt-in) Consent is "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of Personal data relating to him or her." In plain language, this means that:
 - 3.2.1. You have to give us your Consent freely, without us putting you under any type of pressure;
 - 3.2.2. You have to know what you are Consenting to – so we will make sure we give you enough information;
 - 3.2.3. You should have control over which processing activities you Consent to and which you don't;
 - 3.2.4. You need to take positive and affirmative action in giving us your Consent – we are likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.
- 3.3. We will keep records of the Consents that you have given in this way.
- 3.4. In some cases, we will be able to rely on soft opt-in Consent. We are allowed to market products or services to you as long as you do not actively opt-out from these communications.
- 3.5. Sometimes it may be necessary for us to process Personal data and, where appropriate and in accordance with local laws and requirements, Sensitive Personal data in connection with exercising or defending legal claims. Article 9(2)(f) of the GDPR allows this where the processing "is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity".
- 3.6. This may arise for example where we need to take legal advice in relation to legal proceedings or are required by law to preserve or disclose certain information as part of the legal process.

4. GENERAL PRINCIPLES

- 4.1. The Company's policy is to process Personal data in accordance with the applicable data protection laws and rights of individuals as set out below. All Associates have personal responsibility for the practical application of the Company's data protection policy.

- 4.2. The Company will observe the following principles in respect of the processing of Personal data:
- 4.2.1. To process Personal data fairly and lawfully in line with individuals' rights;
 - 4.2.2. To make sure that any Personal data processed for a specific purpose are adequate, relevant and not excessive for that purpose;
 - 4.2.3. To keep Personal data accurate and up to date;
 - 4.2.4. To keep Personal data for no longer than is necessary;
 - 4.2.5. To keep Personal data secure against loss or misuse;
 - 4.2.6. Not to transfer Personal data outside the EEA (which includes the EU countries, Norway, Iceland and Liechtenstein) without adequate protection or permission.

5. DATA RETENTION

- 5.1. If you are a Client of the Company, we need to collect and use information about you, or individuals at your organisation, in the course of providing you a service.
- 5.2. We need a small amount of information from our suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you.
- 5.3. We collect a limited amount of data from our website users which we use to help us to improve your experience when using our website and to help us manage the services we provide. This includes information such as how you use our website, the frequency with which you access our website, and the times that our website is most popular.
- 5.4. A number of elements of the Personal data we collect from you are required to enable us to fulfil our contractual duties to you or to others.
- 5.5. Depending on the type of Personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

6. HOW DO WE COLLECT YOUR DATA?

- 6.1. There are two main ways in which we collect your Personal data:
 - 6.1.1. Directly from you;
 - 6.1.2. Third parties.
- 6.2. We collect your data automatically via cookies when you visit our website, in line with cookie settings in your browser.

7. HOW WE USE YOUR DATA

- 7.1. The main reason for using information about Clients and Associates is to ensure that the contractual arrangements between us can properly be implemented so that the relationship can run smoothly.
- 7.2. We will collect and use your Personal data for the purposes of processing your transcription order, managing your account, in order to fulfil our contractual obligations, for internal record keeping, and, if you agree, to email you about our services and special offers/updates which we think may be of interest to you.
- 7.3. We may share your information with any of our group companies and associated third parties such as our service providers and organizations to whom we provide services, however we will request your prior Consent to do so.

8. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

- 8.1. If we have not had meaningful contact with you for a period of two years, we will delete your Personal data from our systems unless we believe in good faith that the law or other regulation requires us to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation).

9. HOW CAN YOU ACCESS, AMEND OR TAKE BACK THE PERSONAL DATA THAT YOU HAVE GIVEN TO US?

- 9.1. Even if we already hold your Personal data, you still have various rights in relation to it. To get in touch about these, please contact us and we will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws.
- 9.2. At any point whilst the Company is in possession of or processing your Personal data, all data subjects have the following rights:
 - 9.2.1. Right to object: If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.
 - 9.2.2. Right of access: You have the right to request a copy of the information that we hold about you.
 - 9.2.3. Right to withdraw Consent: Where we have obtained your Consent to process your Personal data for certain activities (for example, for profiling your suitability for certain roles), or Consent to market to you, you may withdraw your Consent at any time.
 - 9.2.4. Right of rectification: You have a right to correct data that we hold about you that is inaccurate or incomplete.

- 9.2.5. Right to be forgotten: In certain circumstances you can ask for the data we hold about you to be erased from our records.
- 9.2.6. Right to object: You have the right to object to certain types of processing such as direct marketing.
- 9.2.7. Right of data portability: If you wish, you have the right to transfer your data from us to another data controller. We will help with this – either by directly transferring your data for you, or by providing you with a copy in a commonly used machine-readable format.
- 9.2.8. Right to lodge a complaint: You also have the right to lodge a complaint with the Information Commissioners Office.
- 9.2.9. Data Subject Access Requests (DSAR): You have the right to ask us to confirm what information we hold about you at any time, and you may ask us to modify, update or delete such information.
- 9.2.10. Right to unsubscribe: If your interests or requirements change, you can unsubscribe from part or all of our marketing content by sending us an email requesting so.

10. WHAT ARE COOKIES AND HOW DO WE USE THEM

- 10.1. A "cookie" is a bite-sized piece of data that is stored on your computer's hard drive. They are used by nearly all websites and do not harm your system. We use them to track your activity to help ensure you get the smoothest possible experience when visiting our website. We can use the information from cookies to ensure we present you with options tailored to your preferences on your next visit. We can also use cookies to analyse traffic and for advertising purposes.
- 10.2. Accessing the website constitutes an agreement that this cookie policy will apply whenever the website is accessed on any device.
- 10.3. The Company reserves the right to vary this cookie policy from time to time and such changes will be posted here and will become effective as soon as they are posted. Continued use of the website constitutes an agreement to all such changes. The website uses small files called cookies. They are used in order to make the website work, or work more efficiently, as well as to store things like user preferences. Cookies are stored by the browser on a user's computer or mobile phone.
- 10.4. The Company uses the following cookies:
 - 10.4.1. Site performance cookies
 - 10.4.2. Anonymous analytics cookies
 - 10.4.3. Geotargeting cookies
 - 10.4.4. Registration cookies
 - 10.4.5. Site performance cookies:

10.5. Site performance cookies:

- 10.5.1. These cookies remember preferences for tools found on the website, so you don't have to re-set them each time you visit.

10.6. Anonymous analytics cookies:

- 10.6.1. Every time someone visits the website, software provided by a third party generates an anonymous analytics cookie;
- 10.6.2. These cookies can tell the Company whether or not you have visited the website before;
- 10.6.3. Your browser will tell the Company if you have these cookies and, if you don't, the Company generates new ones.
- 10.6.4. This allows the Company to track how many individual users it has, and how often they visit the website.
- 10.6.5. Unless you are signed in to the Company it cannot use these cookies to identify individuals.
- 10.6.6. The Company uses them to gather statistics, for example, the number of visits to a page. If you are logged in, the Company will also know the details you gave to it for this, such as your username and email address. Passwords are not stored by or affected by cookies.

10.7. Geotargeting cookies:

- 10.7.1. These cookies are used by software which tries to work out what country you are in from the information supplied by your browser when you click on a web page.
- 10.7.2. This cookie is completely anonymous, and the Company only uses it to help target their content – such as whether you see our UK or US home page – and advertising.

10.8. Registration cookies:

- 10.8.1. When you register with the Company, it generates cookies that let it know whether you are signed in or not.
- 10.8.2. The Company's servers use these cookies to work out which account you are signed in with, and if you are allowed access to a particular service. It also allows the Company to associate any comments you post with your username.
- 10.8.3. If you have not selected 'keep me signed in', your cookies get deleted when you either close your browser or shut down your computer. While you are signed into the site, the Company combines information from your registration cookies with analytics cookies, which the Company could use to identify which pages you have seen on the website.

10.9. Other third party cookies

- 10.9.1. On some pages of the website, other organisations may also set their own anonymous cookies. They do this to track the success of their application, or to customise the application for you. Because of how cookies work, the website cannot access these cookies, nor can the other organisation access the data in cookies we use on the website.

10.10. How to turn cookies off:

- 10.10.1. It is usually possible to stop your browser accepting cookies, or to stop it accepting cookies from a particular website. However, without using cookies, the Company cannot tell if you are signed in.
- 10.10.2. All modern browsers allow you to change your cookie settings. You can usually find these settings in the 'options' or 'preferences' menu of your browser.
- 10.10.3. If you don't want to receive cookies that are not strictly necessary to perform basic features of our site, you may choose to opt-out by changing your browser settings

- 10.11. For more information generally on cookies, including how to disable them, please refer to aboutcookies.org. You will also find details on how to delete cookies from your computer.

11. HOW DO WE SAFEGUARD YOUR PERSONAL DATA?

- 11.1. We care about protecting your information. That's why we put in place appropriate measures that are designed to prevent unauthorized access to, and misuse of, your Personal data.

12. IT AND SECURITY

- 12.1. The Company's desktop and laptop computers are password protected. All work is kept for a maximum of 30 days and then deleted from our systems entirely.
- 12.2. We will retain your personal details in our password protected system.
- 12.3. No hard copies of transcripts are produced by the Company, unless requested to do so for postage reasons, however, no copies are kept by the Company.
- 12.4. All Transcribers/Associates are required to delete all transcripts and digital recordings or any documentation on completion of a Specific Job (or within 30 days from completion).
- 12.5. The Company's servers are protected with the latest antivirus definitions and are updated regularly. They are configured to scan files on access as well as run a full system scan daily.

- 12.6. Transcribers/Associates are required to run up-to-date antivirus software and operating systems.