

## Visual Precision Limited Standard Privacy Notice

### Important information and who we are

#### Purpose of this privacy notice

This website and our social media sites are operated by Visual Precision Limited (“we”, “us” or “Visual Precision”) and we are a controller for the purposes of the Data Protection Act 1998 and the EU General Data Protection Regulation 2016/679. This means that we are responsible for, and control the processing of, the personal information you provide to us when using this website in accordance with this privacy policy.

Visual Precision understands that customers care about the use and storage of their personal information and we value your trust in allowing us to do this in a careful and sensible manner. We have created this privacy policy statement in order to demonstrate our commitment to the privacy of our customers.

By using our websites (including our mobile site), our mobile app, our social media pages, our dedicated telephone line, our helpdesk functions and any other Visual Precision Ltd service, you are acknowledging that we are processing your personal information and, where necessary consenting to such practices, as outlined in this statement.

This privacy notice aims to give you information on how Visual Precision Ltd collect and process your personal data (which generally is quite limited as we are a business-to-business trading company) including any data you may provide through our website/social media sites or otherwise when you sign up to our newsletter, become or renew as a client (which term throughout this notice includes end-user employees), purchase a product or service or access our website dedicated support centre.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

#### Controller

Visual Precision Ltd registered in England registration number 3065416 (collectively referred to as “we”, “us” or “our” in this privacy notice) is the controller and responsible for your personal data.

Our registered address is 2 Sycamore Tree, Elmhurst Business Park, Elmhurst, Lichfield WS13 8EX.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

#### Contact details

Our full details are:

Full name of legal entities: Visual Precision Ltd

Name or title of data privacy manager: Graham Cotton

Email address: [info@visualprecision.co.uk](mailto:info@visualprecision.co.uk)

Postal address: 2 Sycamore Tree, Elmhurst Business Park, Elmhurst, Lichfield WS13 8EX

Telephone number: +44(0)1543 262 222

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on 21 May 2018 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### **Third-party links**

Our website and social media sites 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. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **1. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, job position, current employer name and address, and gender.
- **Professional Data** if you are a member of a professional organisation we may issue CPD certificates to you on request and will store your professional data solely for this use including your membership status and number.
- **Contact Data** includes current and historic business name, billing address, delivery address, email address and telephone numbers.
- **Financial Data** relating to the legal business entity including bank account details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes URL, your login data to our web centre including user name and password, operating system you are running our software on, platform and other technology on the devices you use to access our website.

- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving program updates and marketing from us and your communication preferences.

We may also collect and use **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do **not** collect any **Special Categories of Personal Data** about you (this 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). Nor do we collect any information about criminal convictions and offences.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you as a client or past client and you fail to provide that data when requested, we may not be able to register you as an end-user client or perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services i.e. service updates to our software). In this case, we may not be able to notify you of available updates. We will notify you if this is the case at the time.

## **2. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Professional, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, telephone or otherwise. This includes personal data you provide when you or your employer:
  - Become registered users of our software products;
  - apply for information regarding our products or services;
  - create an access account to our service centre on our website;
  - subscribe to our newsletter service;
  - request marketing to be sent to you;
  - enter a competition or survey; or
  - give us some feedback.
- **Third parties sources.** We may receive personal data about you from various third parties as set out below

- Current and/or former employers and from any qualified sponsors named by you on relevant application forms;
  - Technical Data from analytics providers such as Google based outside the EU; or
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside or outside the EU.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. Visual Precision Ltd use Google Analytics, which collects information anonymously without identifying individual visitors. The cookies store information such as the number of visits to the website and what site referred the visitor to the web page. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). You can set your browser not to accept cookies and the above websites can tell you how to remove cookies from your browser.

### 3. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- If you are (or become) an end-user client your personal data will be used to provide the support services that you require and your name, email, job position and software usage will be stored for the use of support and marketing purposes by and solely by us.
- Where we need to perform a contract for supply of goods and/or services we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

#### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To communicate with you as a potential client	<ul style="list-style-type: none"> <li>a) Personal contact information</li> <li>b) Business name</li> <li>c) Financial</li> <li>d) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>a) Performance of a contract with you Necessary to comply with a legal obligation</li> <li>b) Necessary for our legitimate interests</li> <li>c) to fulfil your requests for further information on our software and services</li> </ul>
To register you as an employee of an end-user client customer or as an actual end-user client if you are an individual	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Professional</li> <li>c) Contact</li> </ul>	<ul style="list-style-type: none"> <li>a) Performance of a contract with your business/employer</li> </ul>
<p>To process and deliver your order including:</p> <ul style="list-style-type: none"> <li>a) Manage payments, fees and charges</li> <li>b) Collect and recover money owed to us</li> </ul>	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Professional</li> <li>c) Contact</li> <li>d) Financial</li> <li>e) Transaction</li> <li>f) Marketing and</li> <li>g) Communications</li> </ul>	<ul style="list-style-type: none"> <li>a) Performance of a contract with you</li> <li>b) Necessary for our legitimate interests (to recover debts due to us)</li> </ul>
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>a) Notifying you about changes to our terms or privacy policy</li> <li>b) Asking you to leave a review or take a survey</li> </ul>	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Professional</li> <li>c) Contact</li> <li>d) Profile</li> <li>e) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>a) Performance of a contract with you</li> <li>b) Necessary to comply with a legal obligation</li> <li>c) Necessary for our legitimate interests (to keep our records updated and to study how end-users use our products/services)</li> </ul>
To enable you to partake in competition or complete a survey	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Professional</li> <li>c) Contact</li> <li>d) Profile</li> <li>e) Usage</li> <li>f) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>a) Performance of a contract with you</li> <li>b) Necessary for our legitimate interests (to study how end-users or potential end-users use or may use our products/services, to develop them and grow our client base and operations)</li> <li>c) Consent</li> </ul>
To administer and protect our Operations and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Contact</li> <li>c) Technical</li> </ul>	<ul style="list-style-type: none"> <li>a) Necessary for our legitimate interests (for running our operations, provision of administration and IT services, network security, to prevent fraud and in the context of a reorganisation or restructuring exercise)</li> <li>b) Necessary to comply with a legal obligation</li> </ul>
To use data analytics to improve our website, products/services, marketing, member and customer relationships and experiences	<ul style="list-style-type: none"> <li>(a) Technical</li> <li>(b) Usage</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our client base and operations and to inform our marketing strategy)</li> <li>(b) Consent</li> </ul>
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> <li>(d) Usage</li> <li>(e) Profile</li> <li>(f) Professional</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (to develop our products/services and grow our membership and operations)</li> <li>(b) Consent</li> </ul>

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

We may use your Identity, Professional, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services or products may be relevant for you (we call this marketing).

If you are an end-user or former end-user of our software we may also contact you with newsletters and/or other technical information relevant to you as part of our client end-user support initiative. We do not regard such communications as marketing unless they also contain offers of services or products.

You will receive marketing communications from us if you have consented to receive such communications, or have requested information from us or have purchased goods or services from us and, in each case, you have not opted out of receiving such marketing communications.

## **Opting out**

You can require us or any third parties acting for us or to whom we have passed your marketing information to stop sending you marketing messages by contacting us at any time.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **4. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 3 above.

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our operations or our assets. Alternatively, we may seek to acquire other entities or merge with them. If a change happens to our operations, then the new combined or merged entity may use your personal data in the same way as set out in this privacy notice.

We may also be required to disclose information we hold about you where legitimately required for legal or regulatory purposes, as part of legal proceedings or prospective legal proceedings.

## 5. Data security

We 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, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We 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 we are legally required to do so.

## 6. Data retention

### How long will you use my personal data for?

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

To determine the appropriate retention period for personal data, we 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 we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Unless we have advised you otherwise, we will keep your personal data (other than the fact of your use of our software products) for 12 years after you ceasing to be an end-user client or employee thereof.

In some circumstances you can ask us to delete your data.

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

## 7. Your legal rights

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

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Further details of these rights can be found at [www.ico.org.uk](http://www.ico.org.uk)

If you wish to exercise any of the rights referred to above, please contact us.

#### **No fee usually required**

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



## What we may need from you

We may need to request specific information from you to help us 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. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

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

## 8. Glossary

### LAWFUL BASIS

**Legitimate Interest** means our interest in conducting and managing our operations to enable us to regulate you as our member and/or give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

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End