

# VIRTUALLYLocal

## Memorable UK Telephone Numbers

### Customer Privacy Notice

This privacy notice has been created to inform you, our existing and former customers, of the types of personal data we process about you. Within this notice we have also included the reasons for why we process your personal data, the lawful basis under the GDPR that allows us to process your data, details of how long your data is kept by us and details of what rights you have regarding your data.

This notice applies to both our current customers and our former customers. We are a data controller of the personal data you supply with us when entering a contract with us as well as a data processor for the data we hold for you regarding our services.

### Data Protection Principles

Under the GDPR, all personal data that we process about you must be done so in accordance with the following principles:

- a) should be processed in a fair, lawful and transparent way
- b) should be collected for specific, explicit, and legitimate purposes
- c) be adequate, relevant and limited to the purpose of processing
- d) be kept up to date. Any data found to be inaccurate must be rectified or erased without delay
- e) should not be kept for longer than is necessary for its given purpose
- f) should be processed in a manner that ensures appropriate security of the personal data

### Personal Data Collected

We keep several categories of personal data regarding our customers. The data we hold is stored within our secure IT systems where it is accessed to enable us to provide the services we offer.

The personal data we hold on our customers can be broken down into the following:

- a) personal details such as name, address, phone numbers, job title, email address, IP information. This data is processed for the delivery of our services and to act as a means of contact in our business dealings
- b) bank account details
- c) Telephony service records

You provide us with all of the data we collect on your when you enter a contract of service with us.

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### What We Do With Your Personal Data

The GDPR allows us to process your personal data for limited reasons only. We mainly process your data to provide with our services as stated in our contract, however, we also process your data to comply with legal requirements and sometimes may process your data if we feel it may benefit both ourselves and you.

A description of how we use your data and the legal basis of doing so under the GDPR follows:

<b>How we use your data:</b>	<b>The legal basis under the GDPR</b>
Set up your account	<i>Contract</i> – it is necessary for you to have an account with us before we can deliver our services
Provide you with telephony solutions	<i>Contract</i> – it is necessary to process your data in order to fulfil a contract for service
Ensuring payments are made under your account	<i>Contract</i> – it is necessary to process your data in order to ensure our contractual agreements are in place
Ensuring VAT is paid	<i>Legal Obligation</i> – we are required to process your data in this way by the law
Retain your data under our data retention policy after your contract has expired	<i>Legal Obligation</i> – we are required by law to keep some information about you even after our contract together has ended
Making financial decisions in relation to entering both initial and subsequent contracts	<i>Legitimate Interest</i> – we may perform credit checks or other financial assessments before entering a contract with you
Contact you regarding the services we provide	<i>Legitimate Interest</i> – we contact you out of our own interests in order to give your more information about our services

We will not process your personal data for any purpose other than for the purpose that it was provided to us for. An exception to this is in a case where we are required or permitted to under the laws of England and Wales. We do not sell any personal data to third parties.

If you no longer wish to receive information about our services, please send an E-Mail to [hello@virtuallylocal.co.uk](mailto:hello@virtuallylocal.co.uk) with this request.

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### Special Category Data

The GDPR defines special category data as any data relating to; Health, Sex Life, Sexual Orientation, Race, Ethnic Origin, Political Opinion, Religion, Trade Union Membership, Genetic and Biometric Data.

We do not process any special category data relating to our customers.

### How Your Personal Data Is Shared

Your personal data may be shared with another third-party in order to fulfil a contract for our services. In cases where your personal data is shared, there will be a strict data processing contract between us and the service provider ensuring that all regulations set out under the GDPR are fulfilled. We ensure external service providers are only authorised to use personal data for the limited purposes specified in our agreement with them.

### How Long Is Your Personal Data Stored?

Personal data from our data subjects is retained in line with our data retention policy. We keep most data for 7 years, which covers the 6 years by law in which we have to keep certain information for a minimum of 6 years plus the current year. Personal data that is no longer necessary to be kept under our data retention policy will be deleted.

### Protecting Your Data

We are aware of our requirements to ensure your data is protected and we have implemented processes to ensure its security.

### Individual Rights

We support your rights in relation to your personal information under the GDPR:

- a) right to be informed on how we use your data (this notice)
- b) right to access a copy of any personal data we hold about you
- c) right to rectification of any errors in your personal data
- d) right to erasure of any of the personal data we hold about you
- e) right to restrict processing
- f) right to data portability
- g) right to object
- h) rights related to automated decision-making including profiling

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We do not perform any automated decision making on your personal data.

If you would like to exercise your right to request a copy of your personal information please email [hello@virtuallylocal.co.uk](mailto:hello@virtuallylocal.co.uk) or write to us using the address found at the start of this Privacy Notice. Proof of your identity will be required for security purposes

If you are unhappy with our actions regarding your personal data, you have the right to lodge a complaint to the ICO.