

## DATA PRIVACY POLICY

Thank you for entrusting me with your information. I take this trust seriously and want to explain how I use your information and why.

### 1) Who am I?

Name:	Maria Cristina Vivan dos Reis
Contact Details:	<a href="mailto:cristina@virtuallybrighter.com">cristina@virtuallybrighter.com</a> <a href="https://www.virtuallybrighter.com">https://www.virtuallybrighter.com</a> (+44) 07802 633 967
Data Retention Period(s) or the criteria I use to decide how long to keep your information:	Your personal data shall be retained for the duration of our engagement.  After this time, your personal data shall be deleted or anonymised, should it be required for my business records such as tax, or for legal purposes.
Card and payment processor	Mettle Bank <a href="#">Mettle Privacy Policy</a>
Cookie Policy:	<a href="#">Cookie Policy – Virtually Brighter</a>
Third Parties:	Your personal data may be shared with third parties where required for the purposes of any transaction on your behalf, by law or where it is necessary for our working relationship.  Potential third parties include: Social media companies Travel agencies Airlines Hotels, restaurants, etc  Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.
Do I transfer your data to any organisations/countries outside the EU/UK?	I do not anticipate the transfer the personal information we collect about you to countries outside the EU in order to fulfil our contract.  However, in such eventuality, to ensure that your personal information does receive an adequate level of protection I will put in place appropriate measures to ensure that your personal information is treated by all relevant third parties in a way that is consistent with and which respects the EU and UK laws on data.

<p>Here is a summary of the safeguards I have put in place:</p>	<p>Data transferred outside of the EU\UK will usually only be to UK Adequate Countries or DPF organisations in the US.</p> <p>However, if our engagement specifically requires data be sent elsewhere, this will be checked with you beforehand. For example, engaging a travel supplier in a destination country.</p>
<p>Do I use any automated decision making/profiling tools on your data?</p>	<p>No.</p>
<p>Person responsible for data within Virtually Brighter:</p>	<p>Maria Cristina Vivan dos Reis</p>
<p>My data regulator contact details can be found at:</p>	<p><a href="https://ico.org.uk/">https://ico.org.uk/</a>  Information Commissioner's Office  Wycliffe House  Water Lane  Wilmslow  Cheshire  SK9 5AF</p> <p>Helpline number: 0303 123 1113</p>
<p>Data Privacy Policy Last Updated:</p>	<p>11/04/2024</p>

## 2) Whose information do I collect?

I process information regarding the following:

- a) "Prospects"  
contacts working at or connected with potential Clients; potential clients.
- b) "Clients"  
who have bought goods or services from me; "Client Contacts" who are individuals employed by or contracted to Clients; children for whom services have been purchased.
- c) "Suppliers", "Associates"  
suppliers or potential suppliers of goods or services to me;
- d) "Affiliates/Referrers"  
who have signed up to my affiliate scheme or who have referred Prospects to me.

**If there is data to be processed for people under the age of 16, please [contact me](#) to discuss.**

## 3) My data policy

I promise respectful treatment of the personal information of everyone I have contact with. I want it to be simple and clear.

This Policy explains how I do that – when and why I collect information, how I use it, the situations when other people can see or use it, and how I keep it secure.

I've split this Policy into sections, depending on who you are:

**Section A** is for everyone and includes information about cookies on my website.

**Section B** is for you if you are or work for a business prospect.

**Section C** is for you If you are a Client or a Client Contact.

**Section D** is for you if I have information about you purely because I'm providing services to a Client.

**Section E** is for you if you're a supplier, associate or Affiliate/Referrer

## **SECTION A: EVERYONE**

Whoever you are, my intention is to use your information to make things work smoothly for you when dealing with me. If that's not how it turns out for you, please make sure to contact me. It's best to put things in writing, which you can do by emailing the address above.

I keep this Policy under regular review, and I may revise it as time goes on. Please check back here from time to time to make sure you've got the latest information.

### **A.1. MY APPROACH TO PERSONAL DATA**

I'm committed to protecting your privacy and honouring your legal rights to control how I use your personal data.

Most of the personal information we process is provided to me directly by you for one of the following reasons:

- because you have asked me to do something (for example, send you newsletters)
- so that I can reply to queries or complaints
- to develop and manage my business relationships
- to fulfil my contracts and help grow my business
- to provide services to clients
- to calculate payments to associates or Affiliates/Referrers
- to meet my legal obligations.

I try to make sure the information I hold is accurate, up to date and is minimised to what is required.

## **A.2. CATEGORIES OF DATA**

The types of information that I process will depend on the nature of my relationship with you.

I may process information about you that you have yourself provided to me or published publicly on the internet through social media or on other websites.

In all cases, I will have what identifying and communication information that is relevant and that I can sensibly obtain: that is:

Your name

Your email address

Your employer or business name

Your job title or position

Your contact address

Your social media addresses.

I may also capture some of the information published by you in your social media output to the extent that it may be relevant to our interactions

If you are or work for a prospect, I will aim to obtain and process information that is relevant to our building a business relationship together, which may relate to your business and your personal interests.

If you are or work for a customer or supplier, I will also keep records of our interactions, the work I have done for you or commissioned by you, the progress of work, and financial and accounting records.

If I'm processing information about you purely because I'm providing services to others, please see **Section D** below. Please note that your rights may be subject to applicable exemptions.

If you have any questions or concerns about my use of your information, or how I have responded to any request about your personal data, please email me at the address above.

If your request is not addressed to your satisfaction, the official authority contact details are set out in Section **1.j** above, and you can raise your concerns with them.

### **A.3. DOWNLOADS, NEWSLETTERS AND SERVICES**

I monitor who opens what in my newsletter lists, and pre-set sequences of information I send you. I do this so I can see if my content is of interest and relevant. This allows me to ensure any future content is suitable for my audience.

There may be sub-routines that trigger if you click on links or articles. These are designed to offer you more information about things you are interested in.

You can unsubscribe from these sequences at any time.

Existing Clients may receive emails about specific offers relating to things you have already purchased. You can unsubscribe from these at any time.

I use automations (sequences of emails that start when you ask for something in particular) to send you the information you requested, to provide you the services you have purchased to. You can unsubscribe from these at any time, but they are not excessive and most people find them useful.

I monitor who reads my mailing and automations, how many times, and which links you choose to use and read. I use this information to increase the content's level of interest and help me improve what I send. You can remove your information from this monitoring by disabling cookies on your website browser before opening emails from me. From time to time, I contact individual email newsletter subscribers, but it is extremely rare.

I may use the data about you from time to time to target advertising campaigns based on profiling the sort of person who wants to receive information from me.

#### **A.4. SOCIAL MEDIA**

I have an active presence on social media. If you are using social media, they hold and use your information in accordance with their data privacy policy.

If you 'like' any of my posts or 'follow' or contact me on social media I keep a record of that. Your replies to me, messages you send me, and your other activity linked to my posts may be seen by members of my associates. My contracts with them hold them to high standards of protecting your information.

#### **A.5. NO SALE OR EXCHANGE OF YOUR DATA**

I do not sell or exchange your personal data with organisations who may want to sell you something or use your data for research or other purposes.

#### **A.6. DATA LOCATION AND PLATFORMS**

Like most small businesses, I do not have any tailor-made software – I use mainstream packages for everything from my Client records, to email, to accounting.

This means that some of your data may be held in the EEA, and some may be held in services in the USA or elsewhere. I have picked mainstream suppliers with appropriate security standards.

#### **A.7. I MAY SHARE SOME OF YOUR DATA WITH THESE PEOPLE**

There may be times when additional parties may have access to your data, but this access will be restricted where possible.

For example, should equipment such as a laptop require IT assistance, remote support will be always monitored to ensure the support firm does not open any personal data wherever possible.

Should support be required in person, again any access will be monitored to ensure personal data is not accessed wherever possible.

Another example would be potential access by accountants for invoicing or tax purposes. Again, any personal data will only be accessed when required.

I do not permit copying or sharing by anyone else and actively monitor for any potential breaches.

Your information/advice is held in the strictest confidence. My associates and support firms are all contracted to confidentiality clauses.

### **A.8. HOW LONG DO I KEEP YOUR DATA FOR?**

Your information will be kept for the length of time set out in our retention period (see Section 1, Table, above).

If you subscribed to a newsletter or updates list, you shall remain on the list(s) you joined until you unsubscribe from that list.

### **A.9. WANT TO SEE WHAT DATA I HOLD ON YOU?**

If you want to know what information I have about you (if any) email the address above and your name and any additional email address(es). I may require you to confirm your identity before proceeding. Provided I can legitimately disclose the information to you (see **Section D**), I will conduct a search and provide the information I have.

### **A.10. WHAT ARE YOUR RIGHTS**

You have the right to know what information I'm collecting on you, and to amend it if it is inaccurate.

If you feel for some reason, I have information I should not be keeping, or is out of date or otherwise incorrect, please let me know and I will take appropriate action.

Most of the information I hold is not based on your individual consent but is based on needing the information to run my business and provide my services.

You have a "right to be forgotten" – but that does have some legal limits. If you want me to remove information about you, let me know. If you have been a Client, I may not be able to remove all data as I will have to ensure that I can continue to comply with legal, accounting, taxation and insurer requirements.

### **A.11. MY LEGAL BASIS FOR PROCESSING YOUR DATA**

Signing onto my newsletter list is by your consent – and when you withdraw your consent I shall stop that processing of your data.

Apart from that, the information I hold is based on my needing the information to run my business and provide my services – either so I can perform my contract with you, or because I have a legitimate business interest in processing your data.

In a few situations I process personal data because I'm under a legal obligation to do so. This principally relates to my business, accounting and tax records.

## **SECTION B: PROSPECTS**

Most of the information I process comes from you. I process it so I can reply to you, and when you contact me again, I have all the details pertaining to our previous discussion.

Typically, I collect the following details:

Your name

Your contact details (social media handles, email address, telephone number)

How I became aware of you or your business (social media posts, advertisements, etc)

Background information from you or published by you on social media or freely accessible on the internet, on why you might be interested in my services or a relevant contact for our business.

If you sign up to a newsletter list, you will be sent only what you asked for. You can unsubscribe at any time by clicking the unsubscribe button on any email.

You are not automatically subscribed to any other lists but may be invited to join an appropriate one.

If I email you individually using my own email system or respond to an email sent to me at any of my business email addresses, a copy of that email will also be retained.

I do not routinely keep special category data. To the extent we hold this, it was supplied or made publicly available by you.

## **SECTION C: CLIENTS**

Once you purchase services from me, I will collect information from you at the point of sale.

This will include the information I collect from Prospects (above). I collect your email address, phone number and postal address so I can provide what I have contracted to, invoice you and keep proper records of my business relationship.

I process your data to support the delivery of services you have bought. I keep records of the services provided to you, and information you give me, so I can support you when needed and advise you of any additional services you may need.

### **C.1. THIRD PARTY DATA**

As well as your own personal data, I understand that you may need to provide me with personal data relating to your employees, your workers, or third parties (often your clients or suppliers) – depending on the services I'm providing to you. I hold all such information under strict confidentiality obligations, as set out in my terms of business.

## **C.2. FINANCIAL AND CREDIT CARD DETAILS**

Credit card payments are handled by an external secure processor in accordance with their data security policies (see Section 1, Table, above).

I receive limited information from my processor for me to associate your payment with your invoice.

If you pay me by BACS or direct transfer, I know only what the bank tells me, which is usually the name of the person who paid me and how much and the reference number.

I do not routinely keep credit scores nor use credit reference agencies.

## **SECTION D: THIRD PARTY INFORMATION**

I will act in accordance with your statutory rights, subject to the exclusions and exemptions that may apply.

When I'm processing data about you on behalf of a Client, I'm operating under the banner of your Client's data privacy policy. I will refer any enquiry from you to them, as they are the 'data controller' responsible for dealing with your query. I will support that by providing relevant information to my Client for passing to you.

When I'm processing data about you because of a direct connection between you and my business I'm acting as a 'data controller' (and operating under this policy).

## **SECTION E: SUPPLIERS, ASSOCIATES AND AFFILIANTES**

If you become a supplier, associate or an Affiliate/Referrer I keep a copy of the contract between us and your bank details so I can pay you. I also keep a record of invoices/payments for accounting purposes.

I keep a record of the work you undertook for me/my clients along with any comments, reviews or suggestions about that work including complaints (if any) and their resolution.

This information is all needed to manage my Client relationships and supply chain.

If I set up an Affiliate/Referrer scheme, Affiliate/Referrer data will be held in accordance with this policy. I will ask you for information when you apply, and that information will be maintained to help administer the scheme.

If you are a Referrer, I remind you that referrals you make to me may only be made with the knowledge and consent of the person being referred.

#### **4) Complaints**

If you have a complaint about the way I'm handling your information or how I have responded to a request for information or removal, you can take this up in the first instance by emailing me at the email address set out above.

If your request is not addressed to your satisfaction, the official authority contact details are set out in Section **1.j** above, and you can raise your concerns with them.