



Virtigon Privacy Policy
Version: 1.0



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Privacy Policy

This privacy notice tells you what to expect us to do with your personal information when you make contact with us or use one of our services. Virtigon takes the privacy of your information very seriously and are committed to processing and collecting your data with the utmost care and ensuring all data we collect is processed lawfully, fairly, and transparently. This privacy policy applies to our use of any and all Data collected by us or provided by us. Please read this privacy policy carefully.

1. Definitions and interpretation

In this privacy policy, the following definitions are used:

Data – collectively all information that you submit to Virtigon including but not limited to, information provided to the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Act 1998.

Cookies – a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies).

Virtigon, we or us – Virtigon Ltd, a company incorporated in England and Wales with registered number 10759175 whose registered office is at 3 Penns Wood, Farnborough, Hampshire, GU14 6RB.

UK Cookie Law – the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011.

User or you – any third party who is not either (i) employed by Virtigon and acting in the course of their employment or (ii) engaged as a consultant

Website – the website, www.virtigon.com, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

In this privacy policy, unless the context requires a different interpretation:

- The singular includes the plural and vice versa.
- References to sub-clauses, clauses, schedules, or appendices are to sub-clauses, clauses, schedules, or appendices of this privacy policy.
- A reference to a person includes firms, companies, government entities, trusts, and partnerships.
- "including" is understood to mean "including without limitation".
- Reference to any statutory provision includes any modification or amendment of it.
- The headings and sub-headings do not form part of this privacy policy.

2. Scope of this privacy policy

This privacy policy applies only to the actions of Virtigon and Users. It does not extend to any websites that can be accessed from our Website including, but not limited to, any links we may provide to social media websites.

3. Data collected

We may collect the following Data, which includes personal Data, from you, via email, telephone and web forms:

- Name
- Job Title.
- Contact Information such as email addresses, telephone numbers, addresses and social media.
- Information that you share with us relating to your interest in Virtigon and the services it provides, and other information that will help us provide relevant information to you and to improve our communications and services.
- The following is collected only when using the website:
 - IP address (automatically collected).
 - Web browser type and version (automatically collected).
 - Operating system (automatically collected).
 - A list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected).

In some instances, data may not be collected directly from you for example referral by other contacts.

4. Our use of Data

For purposes of the Data Protection Act 2018, Virtigon is the "data controller".

We will retain any Data collected via cookies for up to 12 months, after which it will be deleted.

Data collected by other means will be retained as per our retention policy which is available on request..

Unless we are obliged or permitted by law to do so, and subject to any third-party disclosures specifically set out in this policy, your Data will not be disclosed to third parties. This does not include our affiliates and / or other companies within our group.

All personal Data is stored securely in accordance with the principles of the Data Protection Act 2018. For more details on security see the clause below (Security).

Any, or all the above Data may be required by us from time to time to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:

- Internal record keeping.
- Improvement of our products / services.
- Transmission by email of promotional materials that may be of interest to you.
- Contact for market research purposes which may be done using email, telephone, fax or mail. Such information may be used to customise or update the Website.
- Fulfilment of services
- Processing of transactions, including financial.

The lawful basis we rely on to process personal data for the above purposes is outlined in Article 6 sections 1(a) & (b) of GDPR regulation (2016), where clear consent has been given to Virtigon, by the individual to process the personal data for an agreed specific purpose or processing is necessary for

the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering a contract.

5. Third party websites and services

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

In the case where we do need to share any data with any third party, we ensure they have appropriate security measures in place to protect your data. We also ensure the data is sent via an encrypted data transfer.

6. Links to other websites

The Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them. We cannot accept responsibility or liability for these policies or any personal data you submit to them.

7. Changes of business ownership and control

Virtigon may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Virtigon. Data provided by Users will, where it is relevant to any part of our business, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

We may also disclose Data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

We will, where possible, provide notice of any changes and give full details of who the data previously given to Virtigon will be passed to. At this point, you will still have the right to withdraw your consent. This privacy policy will also be accordingly updated to reflect the changes.

8. Controlling use of your Data

Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

- use of Data for direct marketing purposes; and
- sharing Data with third parties.

As we require your consent to process any of your data, you are also able to withdraw that consent at any time. If you wish to remove your consent, please contact Virtigon using the details in Section 15 of this Privacy Policy.

The following rights are also applicable in respect of the processing of your data. These rights are subject to the reasoning for processing your data.

- **Right of Access** - You have the right to request copies of your personal information at any time unless the circumstance is deemed 'manifestly unfounded or excessive'.
- **Right to rectification** - You have the right to rectify any personal data you feel is inaccurate or incomplete. This right is always applicable.
- **Right to erasure** - You have the right to request any data to be removed if:
 - We no longer need the data for its original purpose.
 - You previously gave consent but have now withdrawn it.
 - You object to our use of your data
- **Right to restriction of processing** - You have the right to request a restriction of the way we process your data if you object to a way we are using it.
- **Right to object to processing** - You have the right to object to how we process your data, at any time, to stop or prevent the processing. This must be backed by strong and legitimate reasoning from both Virtigon and the User.
- **Right to data Portability** - You have the right to have access to your personal data held by Virtigon, in an easily accessible manner.

9. Functionality of the Website

To use all features and functions available on the Website, you may be required to submit certain Data.

You may restrict your internet browser's use of Cookies. For more information see the clause below (Cookies).

10. Security

Data security is of great importance to Virtigon and to protect your Data we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure Data collected.

We keep personal data for the duration of your contract, if one is in place, and the relevant statutory length of time after this period or 12 months, whichever is the longer. We will then dispose of your information by destroying it securely.

Website only:

- If password access is required for certain parts of our website, you are responsible for keeping this password confidential.
- We endeavour to do our best to protect your personal Data. However, transmission of information over the internet is not entirely secure and is done at your own risk. We cannot ensure the security of your Data transmitted to or from our website.

11. Cookies

The Website may place and access certain Cookies on your computer. Virtigon uses Cookies to improve your experience of using the Website. Virtigon has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

All Cookies used by this Website are used in accordance with current UK Cookie Law.

Before the Website places Cookies on your computer, you will be presented with a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Virtigon to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

This Website may place the following Cookies:

- **Strictly necessary cookies** – These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies** – They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies** – These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies** – These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser.

You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

12. Transfers outside the UK

Data which we collect from you may be stored and processed in and transferred to countries outside of the UK. For example, this could occur if our servers are located in a country outside the UK or one of our service providers is situated in a country outside the UK. We also share information with our group companies, some of which are located outside the UK. These countries may not have data protection laws equivalent to those in force in the UK.

If we transfer Data outside the UK in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this privacy policy. You expressly agree to such transfers of Data.

13. General

You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

This privacy policy is governed by and interpreted according to English law. All disputes arising under this privacy policy are subject to the exclusive jurisdiction of the English courts.

14. Changes to this privacy policy

Virtigon reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

We regularly review and, where necessary, update our privacy information. Where any changes are made, there will be a log of what the changes are and when they were made.

We keep our privacy notice under regular review to ensure it up to date and accurate.

Last updated June 2021

15. Contact details

You may contact Virtigon by either

Email to:

dpo@virtigon.com

or

In writing to:

FAO DPO
Virtigon
3 Penns Wood
Farnborough
GU14 6RB
0207 866 2483

16. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at the above address.

Virtigon Privacy Policy

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>