



## How We Use Your Personal Data

This Privacy Notice explains how Vivio uses and manages the information we hold about our Customers. This includes:

- Why we collect and keep information about you.
- What information we collect.
- How long we may keep your information.
- Who may see your information.
- Who we may share your information with.
- Your rights in relation to your information.

### Confidentiality

Vivio collects, stores and uses large amounts of personal information every day. This information is used by lots of different people as part of their normal work. We take our duty to protect your personal information very seriously. We will take all reasonable means to keep your information confidential whether this is held on computer, on paper or on other media.

Every member of staff working for Vivio has a legal duty to keep information about you secure and confidential. This is also included in staff contracts of employment.

At Vivio, we aim to provide you with the highest quality of Customer Care. To do this we must keep records about you, and the services we have provided to you or plan to provide to you. The information we hold about you is protected by strict physical, electronic and other means.

Our Customer Services staff will ask you to provide information about yourself. This information is necessary in order for us to provide you with the best possible care and treatment.

### Information we hold about you

At Vivio, we aim to provide you with the highest quality of Client Service. To do this we must keep records about you, your company, your employees and the services we have provided to you or plan to provide to you. The information we hold about you is protected by strict physical, electronic and other means. Our Client Services staff may ask you or your employees to provide certain personal information. This information is necessary in order for us to provide you with the best possible service. Information about you may be written on paper or recorded electronically. The types of information we collect or process may include:



- (a) Director / employee name(s)
- (b) Mobile phone number(s)
- (c) Mobile /fixed line phone call records
- (d) Director / employee home address(es)
- (e) Office address(es)
- (f) Director date of birth
- (g) Director personal identification documents
- (h) Director / employee personal contact details such as email address / phone number
- (i) Mobile device location information
- (j) Mobile / fixed service call recordings

### **How your personal information is used**

We comply with the General Data Protection Regulations to process your personal data. This is in order to provide you with appropriate services or to meet contractual or legal obligations or because you have consented to provide us with the information. We do not send or process your data outside the European Economic Area. Your records are mostly used to direct, manage and deliver your services so that:

- (a) Our Client Services team have accurate and up-to-date information about the services you receive, and to provide you and your employees with the right advice and support about these services
- (b) Any concerns you may have about your Services can be properly investigated.

If we intend to use the information for any other purpose, then you will be asked first. We respect your wishes to not share certain items of confidential information about you and your employees unless we are required to share it by law. We will always explain what information we want to share, why we want to share it and who we want to share it with. This will then help you to decide if that's ok.

From time to time we will also contact you to make you aware of other products that we feel will be of benefit to you and your Company.

### **Who we may share your information with**

Information will be seen by staff looking after you and your employees and by others involved in delivering your services. There is sometimes a need to share information about you with other telecomms providers so that we can work together to provide you with the best service for your needs. But we will only ever share your information when there is legitimate need to do so. We will not share information with friends or relatives unless they are legally acting on your behalf or unless you say it's ok. We will only share your information with anyone else if we really need to, such as to keep you or other people safe or if a court asks for the information.

### **Keeping your information accurate and up-to-date**

We will make sure that the information we hold about you and your employees is accurate and up-to-date. We may check with you from time to time to make sure we have the right information. If the information is not correct, you can ask us to change it.



## Your Rights

- (a) You have the right to be informed about how your personal data is used at Vivio.
- (b) You and your employees have the right to have any inaccurate information corrected.
- (c) You and your employees have the right to have information deleted or to stop us from using it when we don't need to keep it any more.
- (d) You and your employees have the right to access the personal information we hold about you.
- (e) You have the right of portability – to ask for your information in such a way that it can be easily transferred to different service providers
- (f) You have the right to object if your personal data is being used – particularly for Marketing Purposes
- (g) You have the right to protect yourself against automated decision making and profiling

## Can I see my own records?

In most cases you or your employees can see or receive a copy of your records and to have any information you do not understand explained to you. If you have any questions about the personal data we hold please download and complete the Subject Access Request form available at [www.vivio.co.uk/sar](http://www.vivio.co.uk/sar) and then email it to us at [mydata@vivio.co.uk](mailto:mydata@vivio.co.uk). We will provide the information to you within a month of you asking for it. There is no charge for this service.

## How long do we keep your records?

We keep information about you in paper records and also in electronic records. We need to keep this information in order to provide you with the best possible Service. Certain types of information about you need to be kept for longer than other information. We will not keep information about you longer than is necessary or longer than required by law.

## Further Information

If you need further information about the information that we keep about you, speak to a member of staff. We will try to answer your questions. You have the right to complain to the Information Commissioner's Office if you don't think we are dealing with your records correctly. You can write to them at:

Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9

## International data transfers

Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.

Information that we collect may be transferred to the following countries which do not have data protection laws equivalent to those in force in the European Economic Area: [the United States of America, Russia, Japan, China and India].



Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.

You expressly agree to the transfers of personal information described in Section 5.

### **Security of personal information**

We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

We will store all the personal information you provide on our secure (password- and firewall-protected) servers.

All electronic financial transactions entered into through our website will be protected by encryption technology.

You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

### **Amendments**

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

### **Third party websites**

Our website includes hyperlinks to, and details of, third party websites.

We have no control over, and are not responsible for, the privacy policies and practices of third parties.

### **Updating information**

Please let us know if the personal information that we hold about you needs to be corrected or updated.

### **Cookies**

Our website uses cookies.

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry



date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

We use only session cookies on our website.

The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:

- (a) we use \*\_RequestVerificationToken on our website to prevent fraud and improve the security of the website;
- (b) we use \*\_yourAuthCookie on our website to remember your log-in to make it easier for you to log-in each time if you choose to;
- (c) we use \*\_ga (from Google Analytics) on our website analyse the use of the website;
- (d) we use \*\_gat (from Google Analytics) on our website to analyse the use of the website;
- (e) we use \*\_gid (from Google Analytics) on our website to analyse the use of the website;
- (f) we use \*\_CONSENT (from YouTube) on our website analyse the use of the website;
- (g) we use \*\_PREF (from YouTube) on our website analyse the use of the website;
- (h) we use \*\_VISITOR\_INFO1\_LIVE (from YouTube) on our website to analyse the use of the website;

Most browsers allow you to refuse to accept cookies; for example:

- (a) in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
- (b) in Firefox (version 36) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
- (c) in Chrome (version 41), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

You can delete cookies already stored on your computer; for example:

- (a) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>);
- (b) in Firefox (version 36), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and



(c) in Chrome (version 41), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

Deleting cookies will have a negative impact on the usability of many websites.

### **Data protection registration**

We are registered as a data controller with the UK Information Commissioner's Office.

Our data protection registration number is **Z8135166**

### **Further information**

If you need further information about the information that we keep about you, speak to a member of staff. We will try to answer your questions.

You have the right to complain to the Information Commissioner's Office if you don't think we are dealing with your records correctly.

You can write to them at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Or email them at: <mailto:accessicoinformation@ico.org.uk>

Or contact them via their website: <https://ico.org.uk/concerns>