



Virtual Satsuma

Virtual Satsuma Ltd Privacy Policy

December 2020

This privacy policy applies between you, the User of this Website and Virtual Satsuma Ltd, the owner and provider of this Website. Virtual Satsuma takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website.

Definitions and interpretation

1. In this privacy policy, the following definitions are used:

Data	collectively all information that you submit to Virtual Satsuma via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
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);
Data Protection Laws	any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK;
GDPR	the General Data Protection Regulation (EU) 2016/679;
Virtual Satsuma, we or us	Virtual Satsuma of 6 Valerian Drive, Stafford, ST16 1FJ
UK and EU 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 that accesses the Website and is not either (i) employed by Virtual Satsuma and acting in the course of their employment or (ii) engaged as a consultant or otherwise



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providing services to Virtual Satsuma and accessing the Website in connection with the provision of such services; and

the website that you are currently using, www.virtualsatsuma.com, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

Website

2. In this privacy policy, unless the context requires a different interpretation:
 1. the singular includes the plural and vice versa.
 2. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy.
 3. a reference to a person includes firms, companies, government entities, trusts and partnerships.
 4. "including" is understood to mean "including without limitation".
 5. reference to any statutory provision includes any modification or amendment of it.
 6. the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy

3. This privacy policy applies only to the actions of Virtual Satsuma and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
4. For purposes of the applicable Data Protection Laws, Virtual Satsuma is the "data controller". This means that Virtual Satsuma determines the purposes for which, and the manner in which, your Data is processed.

Data collected

5. We may collect the following Data, which includes personal Data, from you:
 1. name.
 2. job title.
 3. profession.
 4. contact Information such as email addresses and telephone numbers.
 5. demographic information such as postcode, preferences and interests.
 6. financial information such as credit / debit card numbers.
 7. IP address (automatically collected).
 8. web browser type and version (automatically collected).
 9. operating system (automatically collected).
 10. the metadata associated with the communication.
 11. and information contained in communications between the user and Virtual Satsuma.

in each case, in accordance with this privacy policy.



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How we collect Data

6. We collect Data in the following ways:
 1. data is given to us by you.
 2. data is received from other sources; and
 3. data is collected automatically.

Data that is given to us by you

7. Virtual Satsuma will collect your Data in a number of ways, for example:
 1. when you contact us through the Website, by telephone, post, e-mail or through any other means.
 2. when you complete surveys that we use for research purposes (although you are not obliged to respond to them).
 3. when you enter a competition or promotion through a social media channel.
 4. when you elect to receive marketing communications from us.
 5. when you use our services.

in each case, in accordance with this privacy policy.

Data that is received from publicly available third parties sources

8. We will receive Data about you from the following publicly available third-party sources:
 1. Instagram.
 2. Twitter.
 3. Facebook.
 4. LinkedIn.

Data that is collected automatically

9. To the extent that you access the Website, we will collect your Data automatically, for example:
 1. we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
 2. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".



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Our use of Data

10. Any or all of the above Data may be required by us from time to time in order 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:
1. internal record keeping.
 2. improvement of our products / services.
 3. transmission by email of marketing materials that may be of interest to you.
 4. 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.

in each case, in accordance with this privacy policy.

11. We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).
12. For the delivery of direct marketing to you via e-mail, we'll need your consent, whether via an opt-in or soft-opt-in:
1. soft opt-in consent is a specific type of consent which applies when you have previously engaged with us (for example, you contact us to ask us for more details about a particular product/service, and we are marketing similar products/services). Under "soft opt-in" consent, we will take your consent as given unless you opt-out.
 2. for other types of e-marketing, we are required to obtain your explicit consent; that is, you need to take positive and affirmative action when consenting by, for example, checking a tick box that we'll provide.
 3. if you are not satisfied about our approach to marketing, you have the right to withdraw consent at any time. To find out how to withdraw your consent, see the section headed "Your rights" below.
13. We may use your Data to show you Virtual Satsuma adverts and other content on other websites. If you do not want us to use your data to show you Virtual Satsuma adverts and other content on other websites, please turn off the relevant cookies (please refer to the section headed "Cookies" below).



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Who we share Data with?

14. We may share your Data with the following groups of people for the following reasons:
1. our employees, agents and/or professional advisors – to obtain advice from professional advisers.
 2. relevant authorities – to facilitate the detection of crime or the collection of taxes or duties.

in each case, in accordance with this privacy policy.

Keeping Data secure

15. We will use technical and organisational measures to safeguard your Data, for example:
1. access to your account is controlled by a password and a username that is unique to you.
 2. we store your Data on secure servers.
 3. payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).
16. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: info@virtualsatsuma.com
17. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

Data retention

18. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.
19. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.



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Your rights

20. You have the following rights in relation to your Data:
1. **Right to access**– the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information, we hold about you, we will not charge you for this, unless your request is “manifestly unfounded or excessive.” Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
 2. **Right to correct**– the right to have your Data rectified if it is inaccurate or incomplete.
 3. **Right to erase**– the right to request that we delete or remove your Data from our systems.
 4. **Right to restrict our use of your Data**– the right to “block” us from using your Data or limit the way in which we can use it.
 5. **Right to data portability**– the right to request that we move, copy or transfer your Data.
 6. **Right to object**– the right to object to our use of your Data including where we use it for our legitimate interests.
21. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: info@virtualsatsum.com
22. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner’s Office (ICO). The ICO’s contact details can be found on their website at <https://ico.org.uk/>.
23. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

Links to other websites

24. This 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.



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Changes of business ownership and control

25. Virtual Satsuma 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 Virtual satsuma. Data provided by Users will, where it is relevant to any part of our business so transferred, 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.
26. We may also disclose Data to a prospective purchaser of our business or any part of it.
27. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Data Controller

28. The data controller responsible for this website is Rebecca Bostock . Our Data Protection Registration number is A8768837