



PRIVACY POLICY

This policy was last updated on: 05 July 2019

INTRODUCTION

This privacy notice provides you with details of how we collect and process your personal data through your use of our site www.ggvirtual.com, including any information you may provide through using our site including submitting a contact form, signing up for newsletter correspondence, entering an online prize draw/competition or utilising our services. By providing us with your data, you warrant to us that you are over 13 years of age.

CONTACT INFORMATION

Georgia Tobin t/a GG Virtual is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

Business name: Georgia Tobin trading as GG Virtual
Email address: hello@ggvirtual.com

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

It is very important that the information we hold about you is accurate and up to date at all times. Please get in touch to update us of any changes to your personal information using by emailing us at hello@ggvirtual.com.

THIRD PARTY LINKS

This website may at any time include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices or practices. We therefore encourage you to read the privacy notice of every website you visit when leaving our site.

THE DATA WE COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows:



- **Identity Data** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.
- **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
- **Financial Data** may include your bank account and payment card details.
- **Transaction Data** may include details about payments between us and other details of purchases made by you.
- **Technical Data** may include your login data, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Profile Data** may include your username and password, purchases or orders, your interests, preferences, feedback and survey responses.
- **Usage Data** may include information about how you use our website, products and services.
- **Marketing and Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.
- **Aggregated Data** may also be collected and processed from your personal data (such as statistical or demographic data) but this data does not reveal your identity and as such in itself is not considered personal data by law. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we combine the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data and therefore used in accordance to this privacy notice.
- We do not collect any **Sensitive Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

HOW DO WE COLLECT YOUR PERSONAL DATA?



We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our site, enquire about GG Virtual's services, search for and/or subscribe to our service and when you report a problem with our site or service.

Automated technologies or interactions. With regard to each of your visits to our site we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. See our [Cookie Policy](#) for more information.

Third parties or publicly available sources. We will receive personal data about you from various third parties as set out below:

- Technical Data from the following parties:
 - Analytics providers
 - Advertising networks
 - Search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services
- Identity and Contact Data from data brokers or aggregators
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register

HOW DO WE USE YOUR PERSONAL DATA?

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. Privacy Policy You have the right to withdraw consent to marketing at any time by contacting us.

WHAT DO WE USE YOUR PERSONAL DATA FOR?

GG VIRTUAL

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data.

We have also explained what our legitimate interests are where relevant. We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new or prospective client	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business communications
To administer and protect our	(a) Identity	(a) Necessary for our

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business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(b) Contact (c) Technical	legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

MARKETING COMMUNICATIONS

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We operate an email mailing list which is used to inform you about products and services we supply and/ news that we publish. You will be invited to subscribe to receive marketing and advertising.

When signing up with your email address for a service or product information you agree that you allow us to contact you from time to time with information on that service or product. The ability to unsubscribe will be easily visible on any email and you will have the option to unsubscribe at any point. You may be given the option to opt in to receive additional communications from us which may contain third party content or information.



Email marketing messages may contain tracking beacons or tracked clickable links or similar technologies in order to track subscriber activity.

PROMOTIONAL OFFERS

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products and services from us and you have not opted out of receiving that marketing.

THIRD PARTY MARKETING

We use Google Analytics Advertising Features; tools used to collect and evaluate usage information (anonymously), enabling Cudo to better understand how our Sites are used, enabling us to constantly improve our services. To collect this information, our Sites use cookies which are detailed in our [Cookie Policy](#). You can opt-out of Google Analytics Advertising Features at any time through Google Ads Settings, Ad Settings for mobile apps, or any other available means. You can also use [Google's browser add-on](#), making it easier for you to opt-out.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will



notify you and we will explain the legal ground of processing. We may process your personal data without your knowledge or consent where this is required or permitted by law.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [Cookie Policy](#).

DISCLOSING YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in the table above:

- Service providers who provide IT and system administration services
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances
- Social media outlets whom we use to deliver relevant content and advertisements to you
- Cloud providers and email marketing platforms, such as DropBox, Google Drive and Mailchimp, in order to manage our relationship with you
- Third parties to whom we sell, transfer, or merge parts of our business or our assets

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (EEA).

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place



procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. In some circumstances you can ask us to delete your data: see below for further information. In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

If you wish to exercise any of the rights set out above, please contact us. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.



We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

INFORMATION WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.