

## Privacy Policy

### Venture Simulations Ltd / VSL – ‘The Company’ Privacy Statement – Clients, Prospective Clients & Users

At Venture Simulations Ltd we take **client privacy** very seriously and will only use your personal information to provide products and services you have requested. However, from time to time we may wish to contact your organisation with details of other products we offer as a company that we feel are appropriate to you.

Venture Simulations Ltd is the Data Controller of the personal information you as an individual provide to us. This means Venture Simulations Ltd determines the purposes for which, and the manner in which, any personal data relating to individuals is to be processed.

Data we handle in the running of our day-to-day business may be outsourced to a third-party processor. Where the company outsources data to a third-party processor, the same data protection standards that the company upholds are imposed on the processor.

For clients of our products (such as people who work within an education institution) we collect and store information (including contact details and client history) on our Customer Relationship Management system (Zoho.com) which is a US-based third party supplier.

At Venture Simulations Ltd we take product **user privacy** very seriously. Please be aware, there is a clear and distinct difference between the data we collect from end users who use our products, such as ‘SimVenture Evolution’, and data we collect from prospective clients and clients for sales and marketing purposes.

The only personal data items stored for end-users of our products such as ‘SimVenture Evolution’ are the ‘User Name’, ‘Full Name’, ‘Password’ (encrypted) and ‘Contact Email Address’ (encrypted). This personal data is stored in a UK data centre and is backed-up to a UK-based Amazon Web Services Server. Personal data items stored for end-users of our products are only used as part of the normal operation of the product and are never used for marketing or for any other purpose.

#### What is this privacy statement for?

The aim of this notice is to give all individuals an insight into how information is used by the company.

#### Why do we collect and use individual’s information?

We collect and use individuals’ information for a number of different reasons:

Most commonly, we process data where:

- We need to comply with a legal obligation
- The company needs that data to perform our legitimate business interests.

Less commonly, we may also process personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use individuals' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Within the company, we use data:

- to support learning, particularly training courses that we run
- to assess the quality of our services using feedback surveys and questionnaires
- to comply with the law
- to respond to product and service inquiries and to help process product evaluations, product demonstrations and product purchases

The categories of individual information that we collect for marketing purposes, hold and share includes:

- Personal information such as name, address, email address and role
- Emergency contact information (staff only)
- Photographs and films of people who have consented for their information to be used by the company for training and marketing purposes

## **Collecting information**

In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us in order to fulfil a specific request, such as supplying evaluation software. Where consent is required, the company will provide specific and explicit information with regards to the reasons the data is being collected and how the data will be used.

## **Storing data**

In accordance with GDPR, the company does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected. All data stored about individuals on VSL electronic records are done so in a highly secure manner and using reputable suppliers of data storage systems.

User data in SimVenture Evolution is backed up regularly and stored for up to 1 year, after which it is deleted. The only personal data stored is the name of the user, the system username, the password (encrypted) and a contact email address (encrypted). None of this data will be used for any purposes, marketing or otherwise, other than to enable the normal working of the SimVenture Evolution system in the case of failure requiring the restoration of the backup.

Coordinators in SimVenture Evolution are able to delete the account data for individual users. Account holders should contact their coordinator if they wish to request that their account be deleted.

## **Who do we share individual information with?**

We share individual information with:

- Company staff and Partner Agents
- Specific company contractors handling client work
- Our CRM database supplier 'Zoho.com Corporation'

## Why we share information

We only share individual information with staff and contractors to allow them to undertake and complete their job to the best of their ability.

## Data sharing security

To be granted access to our information, organisations must comply with GDPR strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention as well as use of the data. Our on-line Customer Relationship Management supplier 'Zoho.com Corporation' is committed to subjecting all personal data received from European Union (EU) member countries, in reliance on the Privacy Shield Framework, and to the Framework's applicable Principles.

We will never without your express consent provide your personal information to any third parties for the purpose of direct marketing or selling.

Other than our UK hosting company (UKHost4U) and Amazon Web Services (based in the UK) we do not share, store or outsource any data arising from the use of SimVenture products, to a third party processor.

Links to respective Privacy Statements for these organisations are available in the links provided below.

## What are your rights?

Under data protection legislation, all clients and prospective clients that have contacted VSL have the right to request access to information about them that we hold. To make a request for your personal information, contact the CEO in the first instance.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer: Peter Harrington in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## Resources & Further Information

- [General Data Protection Regulation](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [Privacy and Electronic Communications Regulations 2003 – The Guide](#)
- [Twitter Privacy Policy](#)
- [Facebook Privacy Policy](#)

- [Google Privacy Policy](#)
- [UKHost4U Privacy Policy](#)
- [LinkedIn Privacy Policy](#)
- <https://www.zoho.com/privacy.html>
- <https://www.ukhost4u.com/privacy-policy/>
- <https://aws.amazon.com/compliance/data-privacy-faq/>

## **Privacy Policy Changes and other notes**

Although most changes are likely to be minor, VSL may change its Privacy Policy from time to time, and in the company's sole discretion.

VSL employs fewer than 250 people.

The definition of 'legitimate business interests' is based on all information provided by the ICO (Information Commissioner's Office) <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/legitimate-interests/when-can-we-rely-on-legitimate-interests>