

VSL Privacy Statement

Venture Simulations Ltd / VSL – 'The Company' Privacy Policy

Venture Simulations Ltd is the Data Controller of the personal information you provide to us. This means Venture Simulations Ltd determines the purposes and the way, any personal data is to be processed.

There is a clear and distinct difference between the data we collect and hold from:

- **prospective clients** and **clients** (purchasers/learning providers eg University Staff)
- **end users** of our products (eg. Student Users within a University)

Note: If clients choose to use SSO to enrol Users onto our platforms then the only data held on our systems will be the first and last name of the user.

The Company is committed to protecting the privacy of our prospective clients, clients and end users. This statement explains how we collect, use and safeguard your personal information when you use our products, services, or interact with us.

Prospective Client and Client Privacy

Information we collect

We may collect the following types of information:

- Personal information such as name, contact details and role.
- Emergency contact information (client staff only).
- Photographs and video for training and marketing purposes (by consent only).

How we use your information

We use your information for the following purposes:

- To provide, maintain, and improve our services.
- To communicate with you regarding updates, support, and marketing.
- To respond to product and service inquiries and to help process product evaluations, product demonstrations and product purchases
- To comply with legal and regulatory obligations.
- To protect against fraud, security threats, and abuse.

We share individual information with:

- Company staff, contractors and Partner Agents
- Specific company contractors handling client work

All staff, contractors and Partner Agents are made aware of and contracted to adhere to this policy.

Information Sharing and Disclosure

We do not sell or distribute your personal information, however we may share your data with:

- Service Providers: Third-party organisations who assist with our operations (see below).
- Legal Compliance: When required by law or to protect our rights.

Storage and Security

Client information is processed using the following third-party services

- Zoho Customer Relationship Management (Zoho.com) - a US-based third-party supplier.

End User Privacy

Information we collect

We may collect the following types of information:

Validate:

- Full Name
- Username (Email Address)
- Password (encrypted)

Evolution

- Full Name
- Username
- Password (encrypted)
- Contact Email Address (optional (used for password and username reminders))

How we use your information

We use your information for the following purposes:

- To provide and maintain our services.
- To communicate with you regarding support.

We share individual information with:

- Company staff, contractors and Partner Agents
- Specific company contractors handling client work

All staff, contractors and Partner Agents are made aware of and contracted to adhere to this policy.



Information Sharing and Disclosure

We do not sell or distribute your personal information, however we may share your data with:

- **Service Providers:** Third-party organisations who assist with our operations (see below).
- **Legal Compliance:** When required by law or to protect our rights.

Personal data items stored for end users are only processed as part of the normal operation, maintenance and support of our products and are never used for marketing or any other purpose.

Storage and Security

End user information is processed using the following third-party services

- Amazon Web Services (aws.amazon.com)
- Digital Ocean (www.digitalocean.com)
- Ukservers (www.digitalocean.com)
- Sendgridwww.digitalocean.com

Data Retention

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.

Coordinators using Evolution can delete the account data for individual users within their administrative permissions. End users should contact their coordinator if they wish to request that their account data be deleted.

Collecting information

We will inform you if you are required to provide certain information not specified above to fulfil a specific request.

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.

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.

Data Storage Partners

Where the company outsources data processing to a third-party processor, the same data security standards that the company upholds are imposed on the processor.

Client data storage partners:

- Zoho Customer Relationship Management (Zoho.com) - a US-based third-party supplier.
- Amazon Web Services (aws.amazon.com) - a global provider of web services (UK-based sever storage).



Your rights

Under data protection legislation, all prospective clients, clients and end users 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 any processing of personal data likely to cause 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
- 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

National bodies and agencies

- [UK Data Protection Act 2018](#)
- [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2019](#)
- [Privacy and Electronic Communications Regulations 2003](#)
- [Privacy and Electronic Communications Regulations 2003 – The Guide](#)

- <https://www.zoho.com/privacy.html>
- <https://aws.amazon.com/compliance/data-privacy-faq/>
- <https://www.ukservers.com/>
- <https://www.ukservers.com/news/uncategorized/weve-updated-privacy-policy/>

- [X Privacy Policy](#)
- [Meta Privacy Policy](#)
- [Google Privacy Policy](#)
- [LinkedIn Privacy Policy](#)

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 at the company's sole discretion. VSL employs fewer than 250 people.

The definition of 'legitimate business interests' is based on 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>

