

Virtual Access Privacy Policy

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Privacy Policy

We take the protection of your data seriously. We want you to feel confident that we are keeping your data secure, and that we handle and process it in accordance with the European General Data Protection Regulation.

We want to give our customers the best possible experience. To do so, we need to collect personal data from you for certain processes such as providing a service and when you enquire about our services.

Our Privacy Policy applies to the personal data that Virtual Access collects and uses.

References in this Privacy Policy to "Virtual Access", "we", "us" or "our" mean Virtual Access Limited, a company registered in Ireland with registration no 253172 and registered office at:

Unit 15,

Trinity Enterprise Centre

Pearse Street

Dublin

D02 AD79

Ireland

We control the ways your personal data are collected and the purposes for which your personal data are used by Virtual Access for the purposes of and in accordance with the European General Data Protection Regulation.

When using the term 'personal data' in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data may include for example your name, your contact details, information relating to any products you have purchased or information on how you use our website and app or you interact with us.

We collect some personal data from you, for example when you buy a product from us, use our website, use our services or contact us. We may also receive your personal data from our suppliers who provide services to you on our behalf (for example when you provide feedback on our services).

For more information on the parties who may share your personal data with us, contact data.protection@virtualaccess.com

Safety and security is our priority

If you contact us, we have to collect and keep a little data about you, like your name, email address, and any payment details. We promise to collect, process, store and share your data safely and securely. We'll also make sure that the other businesses we work with are just as careful with your data. Plus by listening to what our customers tell us, we can make changes, to make things easier where we can.

If the information we hold on you is wrong, you can email us at data.protection@virtualaccess.com, let us know what needs updating and we will correct it.

Categories of data we collect

We may collect and process the following categories of information about you:

- Your name and surname and your contact details (email address, telephone number and postal address)
- When you purchase Virtual Access products or services
- When you contact Virtual Access using our website contact form
- The communications you exchange with us (for example, your emails, letters, calls, or your messages)
- Your posts and messages on social media directed to Virtual Access
- When you interact with us on social media
- When you reply to our requests for feedback or participate in our customer surveys
- Information about how you use our website, such as your searches for products
- When you navigate on our website

How and why we use your personal data

We use your personal data for the following purposes:

- To provide our business services to you and to personalise and improve your customer experience
- To improve our services, fulfil our administrative purposes and protect our business interests
- Marketing - to inform you about our news and offers that you may like

We use your information to:

- Perform our services in relation to your purchase or SLA
- To communicate with you and manage our relationship with you.
- Occasionally we may need to contact you by email for administrative or operational reasons, for example in order to send you confirmation of your SLA, purchases and your payments.
- To comply with our legal obligations, for example, our obligation to provide your information to customs agencies.
- We will also use your personal data if we contact you after you have sent us a request, filled in a web-form through our website or contacted us on social media.

- Your opinion is very important to us, so we may send you an email or survey form to seek your feedback.
- We will use the communications you exchange with us and the feedback you may provide in order to manage our relationship with you as our customer and to improve our services and experiences for customers.
- We may use your personal data in order to tailor our services to your needs and preferences and to provide you with a personalised customer experience.

The business purposes for which we will use your information include accounting, billing and audit, credit or other payment card verification, fraud screening, safety, security and legal purposes, statistical and marketing analysis, systems testing, maintenance and development. Please be aware that these communications are not made for marketing purposes and as such, you will continue to receive them even if you opt-out from receiving marketing communications. We may also collect information on how you use our website, which pages of our website you visit most, which products you search for and what products you buy, in order to understand what you like. We may use this information to tailor the content you see on our website and, if you have agreed to receiving marketing communications, to send you relevant messages that we think you like.

If you choose to receive email marketing from Virtual Access, we can let you know of new products, events and news involving Virtual Access. Remember you are in control and you can manage your preferences at any time.

If you are happy to receive marketing communications, we will provide you with news from us such as new products that you may be interested. Please note that we do not share your contact details and other personal data with other companies for marketing purposes, unless we have obtained your consent to do so.

Here are some other ways in which we use this data:

- To help us refine our products and services.
- To make sure we are only sending you communications about products and services that you've shown an interest in.
- To ensure you enjoy a good end-to-end customer experience with us, from managing orders to sending invoices and answering your queries.
- To meet our legal and regulatory obligations.

If you do not want to receive marketing communications from us, you can simply tell us so by clicking the relevant box on our contact form page. You can choose to opt out from receiving marketing communications at any time by clicking on the relevant unsubscribe link at the bottom of any marketing related email you may receive from us. You can also call our Customer Service team on +353 1 604 1800 and express your preference to not receive marketing communications or send an email to data.protection@Virtual Access.com with the header "Unsubscribe".

How long do we keep personal data?

This depends on the type of data and how we use it. When we make a decision on what data to keep we consider the information we need to best provide you with our products and services, to help us manage your relationship with us, and to make sure we can meet certain statutory obligations.

Requesting access to your personal data

You have a right to request access to the personal data that we hold about you.

If you would like to request a copy of your personal data, please contact us at: data.protection@virtualaccess.com.

If you have questions in relation to your personal data, please contact us at: data.protection@virtualaccess.com.

Security of your personal data

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data. When you provide your personal data through our website, this information is transmitted across the internet securely using high-grade encryption.

As described in this privacy policy, we may in some instances disclose your personal data to third parties. Where Virtual Access discloses your personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data; however in some instances we may be compelled by law to disclose your personal data to a third party, such as customs agencies, and have limited control over how it is protected by that party.

The information that you provide to us will be held in our systems, which are located on our premises or those of an appointed third party. We may also allow access to your information by other third parties who act for us for the purposes described in this privacy policy or for other purposes approved by you. Your personal data may be accessed by and processed outside the European Economic Area (the European Economic Area being the European Union and Iceland, Liechtenstein and Norway, also referred to as the "EEA") - including by staff operating outside the EEA who work for us or for one of our suppliers or agents. (This includes staff engaged in, among other things, the provision of support services,). Where your personal data are transferred outside of the EEA, we require that appropriate safeguards are in place.

We will retain your personal data for as long as we need it in order to fulfil our purposes set out in this privacy policy or in order to comply with the law.

Our use of cookies

A cookie is a small piece of text that is placed within the memory of a computer and can be later retrieved by web page servers. We use cookies to enhance your interaction and convenience with our website and do not use cookies to record any personal information.

Cookies may record information about your visit, including the type of browser and operating system you use the previous site you visited, your server's IP address, the pages you access and the information downloaded by you. While this anonymous statistical data may be aggregated and used in broader statistical analysis by us and our web monitoring service provider to improve our services, at no time can we personally identify you as the source of that data.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue you with a cookie when you log on to our website and you are deemed to have consented to the use of the cookie. The purpose for which the cookie is used is for identification of a specific user during a session on our website e.g. when a user is logged on to the website to identify what permissions they have. The cookie will be deleted at the end of the website session.

Use and disclosure of personal information

You acknowledge and consent that by providing your personal information to us that we may use and disclose your personal information for the purposes for which it was collected or for a related or ancillary purpose such as:

- (a) To facilitate and process your order.
- (b) To carry out or respond to your requests for information.
- (c) To our third party service providers to assist us in providing and improving our services to you, and to analyse trends in sales and better understand our customers' needs or to develop, improve and market our goods and services to you.
- (d) For regulatory reporting and compliance with our legal obligations.
- (e) To various regulatory bodies and law enforcement officials and agencies to protect against fraud and for related security purposes.
- (f) Where you have provided your consent, to include in a database compiled by us or our third party service provider for use by us or our third party service provider in direct marketing of promotions, product and services we think may interest you.
- (g) To seek your feedback in relation to customer satisfaction and our relationship with you.
- (h) To our related entities for internal accounting and administration.
- (i) To monitor or improve the quality and standard of service provided to you by us.
- (j) To our successors and/or assigns, including any party that may purchase all or part of our business.
- (k) To better understand your preferences.

Our third party service providers are organisations that include those that may assist us with research, mail and delivery, security, professional advisory, banking, payment processing or technology services. Where we engage third party service providers to perform services for us those third parties may be required to handle your personal information. Under these circumstances those third parties must safeguard this information and must only use it for the purposes for which it was supplied, although we are not responsible for ensuring this.

Other than the above, we will not disclose your personal information without your consent unless disclosure is either necessary to prevent a threat to life or health, authorised or required by law, reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity or any breach of any of the Website Terms of Use of our website.

Any permitted handling of personal information under any exemptions under the Acts will take priority over this Cookies and Privacy Policy to the extent of any inconsistency.

Sharing your personal data

Your personal data may be shared with other partners, resellers or suppliers. It may also be disclosed to a third party who acquires us, or substantially all of our assets. We may also share some of your personal data with, or obtain your personal data from, the following categories of third parties:

- Government authorities, law enforcement bodies and regulators when this is required by law.
- Suppliers providing services to us in order to help us run our business and improve our services and your customer experience.
- At Virtual Access, we select very carefully our suppliers who process your personal data on our behalf and require that they comply with high security standards for the protection of your personal data.

Suppliers list

Our partners have their own privacy policies and terms of use over which Virtual Access does not have control. Whilst Virtual Access carefully selects these partners, it has no responsibility or liability for their privacy policies, terms of use or the way they process your personal data. Please ensure that you review the relevant privacy policies and terms of use of these partners prior to purchasing their goods or services, using their websites, apps or services or providing any personal data to them.

Through our website we provide links to third party websites which are subject to separate Privacy Policies. Please be aware that this Privacy Policy does not apply to such websites and Virtual Access is not responsible for your information that third parties may collect through these websites.

Updates to our privacy policy

We may make changes to this privacy policy from time to time, including as part of the new European data protection legislation which will start to apply on 25 May 2018 (the “General Data Protection Regulation”) - we will update the privacy policy and we will publish on our website any new version of this policy.

Contact information

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to data.protection@virtualaccess.com.

Our privacy complaint process

If you are concerned with the way your personal information has been handled, please contact or write to us, or alternatively, contact our Customer Services Manager, as set out below. If your personal information has not been handled in an appropriate way, we will take steps to remedy your concerns in a reasonable time.

The Customer Services Manager

Virtual Access (Ireland) Limited

Telephone: + 353 1 604 1800 Fax: + 353 1 670 5380

Email: data.protection@virtualaccess.com