

<b>RESTRICTED</b>	
Vision Support Trading Ltd	POLICY
Title: Privacy Policy	Ref: POL.23

## IDENTITY & CONTACT DETAILS OF THE DATA CONTROLLER / PROCESSOR

Vision Support Trading Limited (VST) provides documents in accessible formats to enable those with a vision impairment to be able to easily access information. VST are committed to protecting and respecting your privacy whilst remaining compliant with The GDPR (2016) / The Data Protection Act 2018. In order for us to drive compliance, we have an Information Security Management System which is certificated to ISO 27001:2022 and have implemented the core requirements of BS 10012:2017 Data Protection.

Vision Support Trading Ltd (VST) are the Data Processor of third-party data and the Data Controller of employee data. Should you wish to get in touch with VST regarding how your data has been processed please email; [dscott@vstrading.co.uk](mailto:dscott@vstrading.co.uk)  
You can also contact VST via post at; Vision Support Trading Limited, Unit 8, Capenhurst Technology Park, Capenhurst, Chester, CH1 6EH.

## PURPOSE OF THE PROCESSING AND THE LEGAL BASIS FOR THE PROCESSING

In order for Vision Support Trading (VST) to fulfil its contractual and customer obligations, there is a requirement to process specific personally identifiable information relating to our end users. The legal basis for the processing of such personally identifiable information is that *the processing is necessary for the performance of a contract to which you (the data subject) are party.*

## INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in the form on our website ([www.vstrading.co.uk](http://www.vstrading.co.uk)) such as.
  - **Name** – If you are getting in touch, we need to know who it is that is contacting us.
  - **Email address** – We require your email address in order for us to respond to your message.
  - **Telephone number** – If there are any problems with your email address this gives us an alternative method of communication.
- If you contact us, we may keep a record of that correspondence.
- Details of your visits to our site and the resources that you access.

## RECIPIENTS OF THE PERSONAL DATA

Vision Support Trading (VST) are required to transfer the personal information provided by its clients to third parties in order to fulfil contractual obligations. The following are categories of recipients that end user information could be transferred to:

- Data Centres
- External IT Providers

All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

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We will not disclose your information to any of the relevant third parties listed above for marketing purposes.

We can provide you with contact details of our third parties upon request if required. You are able to do this by emailing us at [marketing@vstrading.co.uk](mailto:marketing@vstrading.co.uk).

## **DETAILS OF TRANSFERS TO THIRD COUNTRIES & SAFEGUARDS**

VST ensures that all data including personally identifiable information held on our end users, clients and employees remains within the U.K. appropriate safeguards have been put in place and audited to verify that the information is kept secure.

## **RETENTION PERIOD**

VST retain all end user information for 30 days from the point of receipt. All employee information is retained for 7 years from the point of termination of employment.

## **RIGHTS OF DATA SUBJECTS**

As a Data Subject (individual) which VST process information on behalf of, you have the right to withdraw consent from our processing at any given time. You can do this by contacting the Data Controller (our client) and request termination of processing.

You also have a right to lodge a complaint with the Supervisory Authority (Information Commissioners Office in the UK), should you feel that we have not handled your information in line with legislative and regulatory requirements.

You have the right to make a Subject Access Request to VST in the event that you wish to determine what information we hold on you at a given time. We welcome these requests and aim to respond within 72 working hours of receipt. You can do this by emailing us at; [marketing@vstrading.co.uk](mailto:marketing@vstrading.co.uk)

## **IP ADDRESSES**

We may collect information about your computer, including where available your IP address, geographic location (if you allow when prompted by your browser), operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns.

## **COOKIES**

We may use cookies to help personalise your online experience. A cookie is a text file that is placed on your hard drive by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, if you personalise the pages on our site, or register on our site for any services we provide, a cookie helps us to recall your specific information on subsequent visits. When you return to our site the information you previously provided can be retrieved, so you can easily use the features that you previously customised.

We may also use cookies to deliver relevant adverts on other reputable websites you visit that show advertising. They will appear in banner format and will be based on your activity whilst browsing our site.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you

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choose to decline cookies, you may not be able to fully experience the interactive features of our site.

If you don't make any changes to your current cookie settings via your browser, the following are the cookies that may be used when you visit this website:

	Purpose	Expires
sess	The cookie is used to collect information about how you use and personalise our site.	When you close your web browser
usr	The cookie is used to work out if you are a returning user and associates you with your past activity on our site	2 years after creation
<b>Google Analytics:</b> __utma __utmb __utmc __utmz __utmx	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve our site. The cookies collect information in an anonymous form, including the number of visitors to our site, where visitors have come to our site from and the pages they visited.	To find out more, please view <a href="#">Google Privacy Policy</a> and <a href="#">Cookies &amp; Google Analytics</a>

## CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time.

If we make significant changes in the way we treat your personal information, or to the Privacy Policy, we will make that clear on our websites or by email, so that you are able to review the changes.

In the event that you wish to you alter your Privacy settings or opt-out, you are able to do this by emailing us at; [dscott@vstrading.co.uk](mailto:dscott@vstrading.co.uk)

## CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should either be emailed to [dscott@vstrading.co.uk](mailto:dscott@vstrading.co.uk) or addressed to Vision Support Trading Limited, Unit 8, Capenhurst Technology Park, Capenhurst, Chester, CH1 6EH.

## Document History

Date	Document Changes	Version
15-12-2017	Initial Version	1
19-12-2018	Reviewed. No updates required	-
18-12-2019	Reviewed. No updates required	-
23-07-2020	Address updated.	2
22-07-2021	Reviewed. No updates required – refreshed with new version number.	3
28-07-2022	Reviewed. No updates required – refreshed with new version number.	4
19-07-2023	Reviewed. Updated GDPR/DPA title and for ISO 27001:2022	5

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