In the background VA customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- <u>Lawful bases and data protection rights</u>
- Where we get personal information from
- How long we keep information
- How to complain

Contact details

Email

inthebackgroundva@gmail.com

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Gender
- Pronoun preferences
- Occupation
- Financial data (including income and expenditure)

- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Audio recordings (eg calls)
- Records of meetings and decisions
- Account access information

We collect or use the following personal information for the **operation of client or customer accounts**:

- Names and contact details
- Addresses
- Purchase or service history
- Account information, including registration details
- Information used for security purposes

We collect or use the following personal information for **research or archiving purposes**:

- Names and contact details
- Addresses
- Purchase or client account history

We collect or use the following personal information to **comply with legal requirements**:

- Name
- Contact information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses

- Payment details
- Account information
- Purchase or service history

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible <u>lawful bases</u> in the UK GDPR. You can find out more about lawful bases on the ICO's website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- Your right to rectification You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- Your right to erasure You have the right to ask us to delete your personal information. Read more about the right to erasure.
- Your right to restriction of processing You have the right to ask us to limit how we can use your personal information.
 Read more about the right to restriction of processing.
- Your right to object to processing You have the right to object to the processing of your personal data. Read more about the right to object to processing.
- Your right to data portability You have the right to ask that
 we transfer the personal information you gave us to another
 organisation, or to you. Read more about the right to data
 portability.

• Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide** and improve products and services for clients are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

 Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **research or archiving purposes**:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information to **comply** with legal requirements:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing** with queries, complaints or claims are:

- Consent we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Where we get personal information from

Directly from you

How long we keep information

I only keep your personal data for as long as it's genuinely needed — whether that's to deliver my services, stay in touch, or meet any legal or tax obligations.

Here's how that typically breaks down:

Client contact details (like your name, email and business info) are kept for up to 2 years after our contract ends. This is so I can get back in touch if we decide to work together again or you reach out down the line.

Emails and messages are usually held for up to 12 months after our last contact, just to make sure I have context if we reconnect or need to refer back to something.

Contracts and service agreements are kept for 6 years after our work together wraps up. This is a standard requirement to comply with legal and financial regulations.

Invoices and payment records are also held for 6 years, as required by HMRC for tax and accounting purposes.

Calendar bookings, task notes or project details are kept for around 6 to 12 months after your retainer or project ends. This helps if you ever ask me to pick something back up or need a refresher on what we did.

Discovery call notes and initial enquiry details (including messages via my website or contact forms) are kept for about 6 months, in case you'd like to revisit our conversation or move forward later.

If at any point you'd like your data removed sooner, just get in touch. As long as I'm not legally required to keep it, I'll delete it promptly.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

Last updated