Privacy Policy

Voca Software Solutions Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all our Customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law. This is how we will handle information we learn about you from your visit to our Website and generally in our business.

What Information do we collect?

When using the website we may ask you for personal information, for example, your name, address or telephone number, e-mail address in order to provide you with the services you wish to make use of. Unless otherwise agreed with you we will not collect any sensitive personal data. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions.

Where data is not obtained directly from you but from a third party the categories of such data may include individuals' contact details, educational background, financial and pay details, details of certificates and diplomas, education and skills, marital status, nationality, job title, and CV. Sources for such data may include the third party's databases and public sources.

Legal basis for the processing of Data

Our processing of personal data will satisfy at least one of the following processing conditions:

- Consent you have given consent to the processing for one or more specific purposes. You have the right to withdraw consent at any time but this will not affect the lawfulness of processing based on consent before its withdrawal;
- 2. Necessary for performance of a contract The processing is necessary for the performance of a contract with you or

in order to take steps at your request prior to entering into a contract. Where this ground applies the provision of the information is a contractual requirement and if you fail to provide it, we will be unable to provide the services that you have requested;

- 3. Legal obligation The processing is necessary for compliance with a legal obligation to which we are subject;
- 4. Vital interests The processing is necessary in order to protect your or another person's vital interests, e.g. in medical emergencies;
- 5. Public functions The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- 6. Legitimate interests The processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data. Legitimate interests include transfer of data for internal administrative purposes, market research activities, direct marketing purposes, preventing fraud, ensuring network and information security and reporting criminal acts or threats to public security.

How we use your information

We use this information to provide you with services we make available on this site or otherwise or to facilitate your use of the site and our services. We also use information to help us analyse how people are using our site so that we can continue to improve the user experience.

We collect information about you to provide your services, manage your account and, if you agree, to email you about other products and services we think may be of interest to you. We use your information collected from the website to personalise your repeat visits to our website. If you explicitly consent, we shall pass on your personal information to our Group of companies so that they may offer you their products and services or to third parties. In providing our services, we may send your details to, and also use information from credit reference agencies and fraud prevention agencies.

We will only collect and use personal information in line with our responsibilities under applicable data protection laws. We may share your information with Group companies, advisers, suppliers, customers and partners as is necessary to ensure that you are provided with the services you have requested.

How long do we keep your information?

We will generally keep your personal data for a minimum of 6 years after which time it will be destroyed, if it is no longer required for the lawful purpose(s) for which it was obtained. If you consent to marketing any information we use for this purpose will be kept by us until you notify us that you no longer wish to receive this information.

What are your rights?

You have the right to request a copy of the information that we hold about you via a subject access request. If you would like a copy of some or all of your personal information, please email us at <u>support@myvoca.co.uk</u> supplying an email address to which the information should be sent. Or in writing to Voca Software Solutions Limited, Level One, Basecamp Liverpool, 49 Jamaica Street, Liverpool, L1 OAH. We may use reasonable means to verify the identity of the person making the request. If we hold a large quantity of data, we may ask you to specify the information or processing activities to which the request relates. We will provide an electronic copy of the information free of charge but we may charge a reasonable, administrativecost fee if further copies are requested.

We will respond to subject access requests within a month. We can extend this by a further two months if the request is complex or if we have received a large number of requests. We can refuse to respond to the request if it is manifestly unfounded or excessive (or charge an administrative fee). We may refuse a request where it is not made for the purpose of allowing you to be aware of and verify the lawfulness of the processing we are carrying out. We can withhold personal data if disclosure would adversely affect the rights and freedoms of others, e.g. involving the conduct of a business in, for example, intellectual property rights, trade secrets and confidential information.

We want to make sure that your personal information is accurate and up to date. If at any point you believe the information we process on you is incorrect you have the right to have it erased in the following circumstances ("right to be forgotten"): (a) You must have objected to the processing and (other than in relation to objections to direct marketing) there are no overriding legitimate grounds to justify the processing; (b) the personal data is no longer needed for the purpose for which it was collected or processed; (c) you withdraw your consent and there are no other grounds for the processing; (d) the personal data is unlawfully processed; or (e) there is a legal obligation to erase the personal data. We do not need to comply if the processing is necessary for rights of freedom of expression or information or for compliance with a legal obligation under law or in certain other limited circumstances permitted by applicable law.

In certain circumstances you have the right to object to the processing of your personal data. We will comply with the request where our processing is for direct marketing purposes or based on the processing conditions of public interest or legitimate interests. We will not comply if the processing is for legal claims or based on a compelling legitimate interest which overrides your interests.

Data transfers

We may transfer data outside of the European Union. Where rules or prohibitions apply to any such transfer, we will comply with any conditions necessary, including by use of consent, model contracts, binding corporate rules, codes of conduct or certification and minor transfers, or other means available from time to time.

Website

When you visit our Website, our Web server automatically recognizes and stores the name of the domain from which you access the Internet (for example, aol.com, if you are connecting from an America Online account), the date and time you access our site, and the Internet Protocol (IP) address of the Web site from where you came. This information enables us to run site usage tools and create statistics about our site. These statistics help us to better understand how our site is being used and what we can do to make it more useful to visitors. This information is not stored in a personally-identifiable format.

Links

This site may contain links to other sites not owned or managed by Voca Software Solutions Limited. Voca Software Solutions Limited is not responsible for the privacy practices of such websites.

Cookies

Cookies (see below) may also collect information about your use of this site or other sites accessible from our website.

Use of "Cookies"

"Cookies" are small files that are placed on your hard drive that assist us in providing customised services. We may use cookies to allow you to enter information less frequently during a session. No other personal information is stored in this cookie. From time to time, Voca Software Solutions Limited may send a "cookie" to your computer. A cookie is a small piece of data that is sent to your browser from a web server and stored on your computer's hard drive. A cookie can't read data off your hard disk or read cookie files created by other sites. Cookies do not damage your system. We use cookies to identify which areas of the Voca Software Solutions Limited websites you have visited or customised, so the next time you visit, those pages may be readily accessible. This information may be used to personalise our services to you. You can choose whether to accept cookies by changing the settings of your browser. You can reset your browser to refuse all cookies, or allow your browser to show you when a cookie is being sent. If you choose not to accept these cookies, your experience at our site and other Web sites may be diminished and some features may not work as intended.

Security of the information

All the information you provide us through forms is stored securely offline. If you send us an email, you should know that email is not necessarily secure against interception unless you are using a security-enabled web browser.

Implementation and Changes to this Privacy Policy

The above policies are effective as of 2 August 2023. Voca Software Solutions Limited reserves the right to change this policy at any time. The use of information that we gather now is subject to the Privacy Policy in effect at this time. Users wishing to see the changes may do so by visiting our privacy policy statement frequently which can be found on our website <u>www.myvoca.co.uk</u>