



Vigo IT Solutions

Privacy Policy v.1.4

The Lauries, 142 Claughton Road, Birkenhead, Wirral, CH41 6EY
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1. Introduction

This privacy notice tells you about us, Vigo IT Solutions (we call ourselves just 'Vigo') and what you can expect when we process your personal data.

- 1.1 Vigo is a private limited company and is registered in England and Wales under number 6524110 and a Data Protection Fee payer registered with the Information Commissioner's Office under number ZA067753.
- 1.2 We provide IT support and related services, have been trading since 2008 and our registered office is at The Lauries, 142 Claughton Road, Birkenhead, Wirral CH41 6EY. Our phone number is 0151 909 7160 and data protection email is compliance@vigoitsolutions.com
- 1.3 Vigo is a genuine, honest and open company who you can rely on to always be vigilant of and maintain your privacy and trust and we pride ourselves on going far beyond the usual promises and platitudes.
- 1.4 Our Data Protection Lead is Melanie O'Connor (Head of Corporate).
- 1.5 Any questions relating to this Policy, complaints or requests can be referred to Melanie O'Connor on compliance@vigoitsolutions.com.

2. Definitions

Consent	Your consent, which must be freely given and clearly made (e.g. ticking a box to agree to receive newsletters). You can withdraw your consent at any time by contacting us as above
Data Controller	The person or organisation that determines how and why data is processed. Vigo is the controller of all personal data relating to its staff, job applicants, customers, suppliers and business contacts
Data Processor	A person or organisation that processes personal data on behalf of a data controller. We don't use any data processors for customer data, but do have a limited number for staff data
Data Protection Laws	The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulations (GDPR)
Data Subject	An identified (or identifiable) living person. This is included here for your reference, though it is not a term we use in this document, as we prefer to just say 'you'!
Personal Data	Any information relating to you and that can identify you either directly or indirectly. If you stop and think about it, there's an amazing amount of data about each of us out there including in our use of the internet, our online services and social media as well as the day to day things like our tax, health and employment related information
Personal Data Breach	A security breach that leads to the accidental (or unlawful) destruction, loss, alteration, disclosure of, or access to the personal data we're responsible for
Processing	Pretty much everything that you can possibly do with data is processing – including keeping it in a box or an online system. If it can be filed, it's processing!
Special Category Personal Data	You may know this as 'sensitive data' and it refers to information that if used would cause you additional harm or detriment including ethnicity, political opinions, religious beliefs, trade union membership, health, sexual orientation, and biometric (such as fingerprint scanning) or genetic data. We might process some health data if reasonable adjustments need to be made for our or our clients' staff, but we don't process anything else
Subject Access Request (SAR)	Your Right to make a request at any time to find out more about the personal data that Vigo holds about you, what we're doing with it, and why. You can do this on any of the contact methods above

3. Vigo's Approach

The Data Protection Act 2018 is by its nature, written in legal jargon – this flies against our preference for communicating in plain English, so some of the terms and principles we describe have been simplified for ease of reading. If you're a bit of a nerd (like us), and would like to read the full provisions, you can find them [here](#).

3.1 The **data protection principles** state that:

- a) we must have a specific reason for processing your information and there are a limited number of those reasons. We can only use your data if we have your consent, or if we need to use it to abide by the law (e.g. health and safety), or to fulfil a contract (e.g. for services or in employment), or where there is a public interest (not likely to apply to us!) or to protect life, or if we've identified that we need it for our business (e.g. keeping quotation details for 1 year in case the requester comes back to follow up on a quote).
- b) We can only collect your data for one of the above reasons and not 'add' another reason without your permission.
- c) We should only use the data we absolutely need and nothing else.
- d) The information should be as accurate and up to date as possible. You can really help us with this by telling us as soon as you can if something changes.
- e) We should only keep it for as long as we need it – we do this by applying expiry/deletion dates to the data we process.
- f) Your data must be kept safe. As an IT company populated by geeks and tech whisperers, you can be confident that we're using the latest security and protection systems to defend your data. Not only that, but we have staff qualified in data protection and our MD is probably the world's no. 1 data protection fan, having mastered the Privacy Professional qualification for both European and US laws, and has achieved Fellow of Information Privacy status. Yep, we take guarding your data that seriously.

4. Your Rights

Even though we've got all the above bases covered, you do have a number of **data protection rights**. These are:

- 4.1 The right to be informed about the data we collect and what we do with it (this notice).
- 4.2 The right to find out more about the data we have about you, what we do with it and why (Subject Access Request). You can do this by emailing compliance@vigoitsolutions.com or through any of the contacts in the first section. We'll let you know within 2 working days that we've got your request and these are usually completed free of charge within 1 calendar month.
- 4.3 The right to ask us to correct any information that is wrong or incomplete. We will do this as soon as we are able to and certainly within 1 month of your request, and we'll let you know when we've done it.
- 4.4 The right to ask us to delete your data if we don't really need it anymore, or if you withdraw your consent, or if you're not happy with us using it and we have no legitimate reason to carry on doing so, or if (and we hope this never happens) it has been processed unlawfully.
- 4.5 The right to ask us to stop processing your data. We will abide by your request but we will let you know if this then means we can't meet our contract with you. Once your request has been agreed, we will likely keep your name and contact email so that we do not inadvertently contact you in the future.
- 4.6 The right to object to us processing your personal data if we're using it for the benefit of our business (legitimate interests) (see Section 5). In the majority of cases, we will stop processing it straight away. This right also applies in the use of data for direct marketing, but as you've probably already realised, we're the nice guys and don't do any of that, so we've included it here for your information only.

We're pretty certain it would never happen, but you also have the right to complain if you think we've not upheld the law regarding your information. We'd love to know if we got something wrong so that we can investigate and make it right but you can also make a complaint to the ICO [Make a complaint | ICO](#)

5. Data we process, why and for how long

In this section, we've separated out the different types of information we process for different groups of people – it may look long, but you can just select the category you'd fall into (customer, enquirer, staff etc.) and check that data table out. Any problems or further questions, please feel free to contact Melanie using the details in Section 1.

5.1 CUSTOMERS/CLIENTS

Data	Why We Use It	Lawful Basis	Kept For
Company name, address and contact/job title	Account admin	Contract (for services)	6 years after service end
Service level agreements	To set out agreement for service/support	Contract (for services)	6 years after service end
Staff names, job titles	Service delivery	Contract (for services)	1 year after service end
Staff email addresses, phone numbers	Service delivery	Contract (for services)	1 year after service end
Staff system log ins, IP addresses	Service delivery	Contract (for services)	1 year after service end
Company history and data (Companies House)	Due diligence	Legitimate interests	Immediate after agreement signed

5.2 SUPPLIERS/CONSULTANTS

Data	Why We Use It	Lawful Basis	Kept For
Company name, address and contact, job title/s	Purchase goods/services	Contract (for services)	2 years after service end
Staff names, contact, job title/s	Purchase goods/services	Contract (for services)	1 year after service end
Contract/service agreement	Purchase goods/services	Contract (for services)	6 years after service end
Company history and data (Companies House)	Due diligence	Legitimate interests	Immediate after service agreement signed
Indemnity insurance	Due diligence	Legitimate interests	3 years after service end

5.3 PARTNERS/ASSOCIATES/BUSINESS CONTACTS

Data	Why We Use It	Lawful Basis	Kept For
Company name, address, contact, job role	To maintain company knowledge, promotional, training and connection opportunities	Legitimate interests	3 years after last contact
Staff names, contact, job role/s	To maintain company knowledge, promotional, training and connection opportunities	Legitimate interests	3 years after last contact

5.4 ENQUIRERS


Data	Why We Use It	Lawful Basis	Kept For
Company/enquirer name, address, contact, job role	To be able to respond to enquiry	Legitimate interests	1 year after enquiry
Nature of enquiry	To ascertain work needed to fulfil request To meet our legal obligations (Subject Access Request)	Legitimate interests Legal	1 year after response sent 6 months after SAR record closed

5.5 JOB APPLICANTS

Data	Why We Use It	Lawful Basis	Kept For
Name, address, contact number/email	To contact you to process your application	Consent	10 days after shortlisting if unsuccessful
Qualifications, experience	Shortlisting for interview	Consent	10 days after shortlisting if unsuccessful
Employment history	Shortlisting for interview	Consent	10 days after shortlisting if unsuccessful
Date of birth or age	May be included on CV	Consent	10 days after shortlisting if unsuccessful

5.6 STAFF

Data	Why We Use It	Lawful Basis	Kept For
Name, address, contact	Staff file administration	Contract (of employment)	6 years after employment end
Emergency contact details	To know who to contact in an emergency	Legitimate interests	Immediate after employment end
Date of birth	Verify tax Staff administration	Legal Legitimate interests	2 years after employment end
Passport/birth cert/ID card	Proof of Right to work	Legal	2 years after employment end
Driving licence (fleet car users/mileage claimants)	Insurance cover	Legal	Immediate after employment end
National Insurance No	To ensure your pay is correct	Contract (of employment)	3 years after employment end
Tax code	To ensure your pay is correct	Contract (of employment)	3 years after tax year following employment end
Financial/bank details	To ensure your pay goes to you	Contract (of employment)	3 years after tax year following employment end
Statutory repayments (e.g. student loan)	To ensure your pay is correct and loan payments made	Legal	3 years after tax year following employment end
Baseline Personnel Security checks (staff working on MoD contracts)	To meet our contractual requirements	Contract	Immediate on sending to client company
Contracts, variations, offer letters	To enter into an employment contract with you	Contract (of employment)	6 years after employment end
Health records	Manage absences and sickness. Support you in work	Legitimate interests	6 months after employment end
Grievance records	To allow you to let us know when something has become an issue For us to deal with allegations	Legitimate interests	6 months after employment end
Capability and disciplinary records	To support and improve your performance	Legitimate interests	2 years after date of action or warning issued
Timesheets, overtime and other working time related records	To ensure your pay is correct	Contract Legal	3 years after end of tax year created 2 years after creation



	To ensure we meet our legal obligations		
Records relating to children and young people	To arrange and manage work experience placements	Legitimate interests	Until the young person reaches age 21

We don't send client, supplier, enquirer or job applicant data to anyone else, ever -unless you ask us to refer you to another business contact or client.

For staff, we use data processors for payroll (Haines Watts Wirral), HR consultancy (Concentric HR and Bramhalls), Pensions (NOW Pensions), Medical cover/cashback (Westfield Health), Car Insurance and Fleet providers (Hiscox Insurance and Lease Plan UK).

For full details, including retention periods for specific personal data types held by Vigo, please feel free to request a copy of our Data Retention Policy and Schedule from Melanie at compliance@vigoitsolutions.com.

6. A bit more on keeping data safe

We told you earlier about the security of our system and staff qualifications, but we also make sure that:

- a) Electronic copies of personal data are protected by passwords and data encryption and backed up onsite or in the cloud. Backups are also encrypted;
- b) All hardcopies of personal data are kept in a locked filing cabinet that only the Senior Management team have access to;
- c) We securely delete or dispose of personal data when its no longer needed or has reached its expiry date;
- d) All data processing companies that we use are checked for compliance with the data protection laws
- e) Staff are trained in data protection
- f) Staff lock their computers when they leave their desks
- g) Passwords are changed regularly and are required to be sufficiently complex. This is tested occasionally.

7. If it goes wrong

We hate to admit it, but we aren't perfect (boo!), and sometimes despite our best efforts, things do go wrong. If the security of your data is breached, it will be reported immediately to Melanie who will do the following:

- 7.1 If the breach is likely to result in a financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage, Melanie will ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- 7.2 If the breach is likely to result in an even higher risk, she'll make sure that you are directly informed of the breach as soon as humanly possible.
- 7.3 Offer you a grovelling apology or something nicer and ask for your forgiveness.

8. Implementation of Policy

Congratulations! you've made it all the way to the end of this Privacy Notice, and as a reward, we'd like to offer you a place on our next 'Leading on Data Protection' training course for the amazing price of £10 instead of the usual £250. This course is designed and delivered by our very own dab hand data protection guru Kurt. As an extra special recognition for getting this far, you have the option to swap this out for a free packet of Jammie Dodgers so just let us know your choice by getting in touch on 0151 909 7160 or compliance@vigoitsolutions.com quoting the special code 'Brains or Biccies'.

This Policy shall be deemed effective as of 21/05/18. No part of this Policy shall have retroactive



effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

Name: Kurt Beaumont Jones

Position: Director

Signature:



Rev.	Date	Nature of Changes	Approved/Reviewed By
0.1	10/05/18	First draft	SR
1.0	21/05/18	First version	MO
1.1	02/02/19	Updated to reflect staff change	MO
	21/05/19	Reviewed for continued accuracy – no changes	MO
1.2	03/06/21	Reviewed and updated to reflect new UK GDPR	MO
1.3	28/04/22	Reviewed, consolidated - and sweetened	MO
	05/04/23	Reviewed for continued accuracy – no changes	MO
1.4	05/04/2024	Amended responsibilities	MO