

# Privacy Policy and Cookie Notice

May 2018

Voucher Systems Limited and Brands.

This document sets out details of how we protect your privacy, and in particular how we gather, use, disclose and manage your data.

The security of your personal information is important to us. This Privacy Policy is designed to help you feel more confident about the privacy and security of your information when using our website or accessing any of services ("**Services**"). We also aim to satisfy the obligation of transparency under the EU General Data Protection Regulation 2016/679 ("**GDPR**") and national laws implementing GDPR.

By using our Service, you agree to the collection and use of your personal information by us in accordance with this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not provide us with any information and do not use our Services.

This Privacy Policy sets out the basis on which we process any personal information we collect from you, our retail partners, or that you provide to us through the Services.

If you have any questions or suggestions regarding our Privacy Policy, please contact us by phone on 0333 9390171 or [info@vouchersystems.co.uk](mailto:info@vouchersystems.co.uk) or by post to VSL, 215, Grangewood House, Oakwood Hill, Oakwood Industrial Estate IG10 3TZ.

For the purpose of this Privacy Policy, Voucher Systems Limited is the controller of personal data provided to us directly by you, and our contact details are set out in the contact section at the end of this Privacy Policy. When you select to use Voucher Systems Ltd for any of its services we are the data processor as well as the controller.

When used in this Privacy Policy, the terms "**Company**", "**we**", "**our**" and "**us**" mean Voucher Systems Limited and the terms "**you**" and "**your**" mean you as a user of our Services.

**Right to Object:** You have a legal right to object at any time to:

- (i) use of your personal information for direct marketing purposes; and
- (ii) processing of your personal information which is based on our legitimate interests, unless there are compelling legitimate grounds for our continued processing

*NOTE: If you do object, we may not be able to provide the Services to you.*

- **1. Age requirements**

We do not knowingly collect personal information from children under 16 years of age. If you are under 16 years old, please do not provide any personal information to us.

- **2. Information we may collect about you**
  - 2.1. We may collect and process the following information about you:
    - Name
    - Address
    - Telephone Number
    - Date of Birth
    - E-mail Address
    - Details of transactions you have made.
- **3. How we use your information**
  - 3.1. We use information held about you in the following ways:
    - 3.1.1 to provide the Services;
    - 3.1.2 to ensure that the Services are presented in the most effective manner for you and for your computer or device;
    - 3.1.3 to identify you when you use the Services, and where possible to customise your experience when using the Services;
    - 3.1.4 to answer your questions and improve the Services;
    - 3.1.5 to notify you about changes to our Services;
- **4. The legal basis for processing your information**
  - 4.1 Under GDPR, the main grounds that we rely upon in order to process personal information of users of our website/app and customers are the following:
    - 4.1.1 necessary for entering into, or performing, a contract – in order to perform obligations that we undertake in providing the Service to you, or in order to take steps at your request to enter into a contract with us, it will be necessary for us to process your personal data;
    - 4.1.2 necessary for compliance with a legal obligation – we are subject to certain legal requirements which may require us to process your personal data. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency;
    - 4.1.3 Consent – in some circumstances, we may ask for your consent to process your personal data in a particular way.
- **5. Where we store your information**
  - 5.1 We take appropriate organisational and technical measures to protect your personal information that we hold. We limit access to your personal information to those who we believe reasonably need to come into contact with that information in order to carry out their jobs.
  - 5.2 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). It may also be processed by persons operating outside the EEA who work for us, one of our associated companies or a third party engaged by us. To the extent that any personal information is provided to third parties outside the EEA, or who will access the information from outside the EEA, we will ensure that approved safeguards are in place, such as the standard contractual clauses approved by the European Commission or the EU/US Privacy Shield.
  - 5.3 Given that the internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Unfortunately, the transmission of information via the internet (including via mobile applications which utilise the internet) is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our Service and any transmission is at your own risk.

- 5.4 We will retain your information for as long as is necessary to fulfill any of the Services we provide or to comply with applicable legislation, regulatory requests and relevant orders from competent courts. Our data retention policy is periodically reviewed.
- **6. Your rights on information we hold about you**
  - 6.1 You have certain rights in relation to personal information we hold about you, which can be exercised in accordance with applicable data protection laws including the GDPR. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.
  - 6.2 Right of Access:
    - 6.2.1 You have the right to access information held about you and you can ask us for a copy of the information at any time. Where we have good reason, and if the GDPR permits, we can refuse your request for a copy of your personal information, or certain elements of the request. If we refuse your request or any element of it, we will provide you with our reasons for doing so.
  - 6.3 Right of Correction or Completion:
    - 6.3.1 If personal information we hold about you is not accurate, out of date or incomplete, you have a right to have the data rectified, updated or completed. You can let us know by contacting us.
  - 6.4 Right of Erasure:
    - 6.4.1 In certain circumstances, you have the right to request that personal information we hold about you is erased e.g. if the information is no longer necessary for the purposes for which it was collected or processed or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.
  - 6.5 Right to object to or restrict processing:
    - 6.5.1 In certain circumstances, you have the right to object to our processing of your personal information by contacting us. For example, if we are processing your information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. You also have the right to object to use of your personal information for direct marketing purposes.
    - 6.5.2 You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy
  - 6.6 Right of Data Portability:
    - 6.6.1 In certain instances, you have a right to receive any personal information that we hold about you in a structured, commonly used and machine-readable format. You can ask us to transmit that information to you or directly to a third party organization.
    - 6.6.2 This right exists only in respect of personal information that:
      - (a) You have provided to us previously; and
      - (b) Is processed by us using automated means

- 6.6.3 While we are happy for such requests to be made, we are not able to guarantee technical compatibility with a third party organization's systems. We are also unable to comply with requests that relate to personal information of others without their consent.
  - 6.7 You can exercise any of the above rights by contacting us.
  - 6.8 Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request for the exercise of your rights.
  - 6.9 To the extent that we are processing your personal information based on your consent, you have the right to withdraw your consent at any time. You can do this by contacting us.
- **7. Cookies**
  - 7.1 We use cookies and similar technologies such as local storage within our apps to provide and optimise our Service. You can control which cookies you get and which you keep on your device through your browser settings. Unless you have adjusted your browser's settings so that it will refuse our cookies, our system will issue cookies when you visit our website. However, if you do not accept cookies you may not be able to take advantage of many of the special features of the Service.
  - 7.2 We use cookies to keep track of the pages you and other visitors have been to on our Service, including serving promotions which we believe are most likely to be of interest to you.
  - 7.3 All of the major browsers offer tips and guidance for managing the cookies available on your browser. There are also lots of different third party browser plug-ins and extensions available which you can download to make it easier to see and control your cookies.
  - 7.4 You can find out more about internet advertising by visiting the following websites: [www.allaboutcookies.org](http://www.allaboutcookies.org), [www.yourchoicesonline.eu](http://www.yourchoicesonline.eu), and [www.networkadvertising.org](http://www.networkadvertising.org). Some of these sites enable you to opt out of online behavioural advertising and other tracking cookies (in addition to the control settings on your browser).
- **8. Keeping your account secure**
  - 8.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Service, you are responsible for keeping this password confidential and you are responsible for any misuse of such information. You must change your password on a regular basis and must not share your password with anyone.
  - 8.2 You are solely responsible for the security and confidentiality of your account. Please ensure that you do not allow anyone else to access the Service in your name and sign off after you have finished accessing your account.
  - 8.3 You are responsible for all orders, and for the accuracy of all information, sent via the internet using your user ID, password or any other personal identification used to identify you on the Service.
  - 8.4 You will be liable to us for all orders or transactions placed by use of your user ID and password, even if such use might be wrongful. We will not be liable to you for any loss that you may incur as a result of misuse of your user ID and password, and we accept no liability resulting from its unauthorised use, whether fraudulent or otherwise.

- **9. Changes to our privacy policy**

We occasionally modify our Privacy Policy and any changes we may make to it in the future will be posted on this page and, where appropriate, notified to you by e-mail or other message. Your continued use of our services shall constitute your acceptance of any revised privacy policy.

- **10. Complaints**

- 10.1 If you are unhappy about our use of your personal information, you can contact us. You are also entitled to lodge a complaint with the UK Information Commissioner's Office using any of the below contact methods:
- 10.2 Telephone: 0303 123 11113
- 10.3 Website: <https://ico.org.uk/concerns/>
- 10.4 Post: Information Commissioner's Office
- Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

- **11. Contact**

- 11.1 If you have any enquiries or if you would like to contact us about our processing of your personal information, including to exercise your rights as outlined above, please contact us by any of the methods below. When you contact us, we will ask you to verify your identity.
- Voucher Systems Limited T/A Childcare Voucher Solutions
- [www.vouchersystems.co.uk](http://www.vouchersystems.co.uk)
- Tel: 0333 939 0171
- 215 Grangewood House,
- Oakwood Industrial Estate,
- Oakwood Hill,
- Loughton IG10 3TZ