



Privacy Policy

Introduction

Welcome to KV Communications Limited's privacy policy.

Privacy and protection of your personal data is important to us and we are committed to ensure you are fully informed about your rights and how we use your data. Our Privacy Notice will tell you how we collect and use your data to improve your experience with us. We'll make sure we collect and store your data securely and only retain it for as long as we need to. You will always be in control of the way we use your data and communicate with you, and should you wish to make a change you will easily be able to do so by emailing us at hello@kvcomms.com. We collect, use and are responsible for certain personal information about you. When we do so we are subject to data protection laws which apply across the European Union and the United Kingdom and we are responsible as 'controller' of that personal information for the purposes of those laws.

By providing us with your data, you warrant to us that you are over 13 years of age. If you are under the age of 13 please do not give us any information.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you fill in our contact form, sign up to receive information from us, purchase a product or service or take part in a competition.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other policies and notices and is not intended to override them.

Controller

KV Communications Limited is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us. Our full details are:

KV Communications Limited, a limited company with company registration number 07521718 and with its registered office at: 32 Byron Hill Road, Harrow on the Hill, Middlesex HA2 0HY.

Name or title of person to contact: Kristel Valaydon

Email address: hello@kvcomms.com

Postal address: KV Comms, c/o Contingent Works, 3 Broadway Buildings, Elmfield Road, Bromley, BR1 1LW

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). However, we care deeply about your data protection rights and we would appreciate the chance to deal with your concerns before you approach the ICO so please contact us using the details above in the first instance.

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by contacting us at hello@kvcomms.com

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy or notice of every website you visit.

Downloads and Media Files

Any downloadable documents, files or media made available on this website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available users are advised to verify their authenticity using third party anti-virus software or similar applications. We accept no responsibility for third party downloads and downloads provided by external third-party websites and advise users to verify their authenticity using third party anti-virus software or similar applications.

Social Media Policy and Usage

We adopt a social media Policy to ensure our business and our staff conduct themselves accordingly online. While we may have official profiles on social media platforms, users are advised to verify authenticity of such profiles before engaging with or sharing information with such profiles. We will never ask for user passwords or personal details on social media platforms. Users are advised to conduct themselves appropriately when engaging with us on social media.

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page.

2. The data we collect about you, and the benefit to you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, delivery or postal address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your log-in data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

We collect information from and about you at various times and in different ways to help us provide you with the best possible service based on our overall understanding of you, as well as to meet our obligations under the law. We use your data to:

- manage your account with us and provide you with products and services you want.
- communicate with you and manage our relationship with you
- personalise and improve your experience
- inform you of latest trends, products, services and promotions that you may like
- improve our services, fulfil our administrative purposes, comply with our legal obligations and protect our business

Sensitive Data

Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data, and criminal convictions and offences.

We do not collect any sensitive data about you.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you (where applicable):
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy here [Cookie Policy](#) for more details.
- **Analytics** We may receive technical personal data about you from analytics providers such as Google and Facebook.
- We may receive Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as PayPal.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- To keep you updated about our products and services where you have consented to this. We shall send this information to you by email] You have the right to withdraw consent to marketing at any time by [contacting us](#) at hello@kvcomms.com and by clicking on the 'unsubscribe' button in our emails.

Purposes for which we will use your personal data

We use a number of partners to help us provide the best possible service, understand what's important to our customers, and improve what we sell. We sometimes need to share your data in order to achieve this, but we choose our partners carefully, and seek the maximum protection possible to keep your data as safe as possible. We also insist that their data is not shared with anyone else. If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the partners we may share your data with are:

IT companies who support our website and other business systems and processes.

Operational companies who help us fulfil our obligations to you. For example, delivery companies, debt recovery agencies, training providers, document storage companies, fraud prevention agencies, credit reference agencies.

Direct marketing companies who help us manage our communications with you.

Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites.

Analytics/Data insight companies to help us better understand what you like or are interested in so we can send you personalised advertisements; to understand how you use our websites; to obtain feedback on your experience; to understand if you liked our promotions.

Legal and enforcement bodies where we have a legal obligation or when it is necessary to protect us both.

Our external professional advisers and insurers. In the event that KV Communications is involved in the transfer of any division or the whole business as a going concern to new owners, your personal data will, where relevant, be transferred to the new owner or controlling party, under the terms of this Privacy Notice.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Our lawful ground for processing your personal data to send you marketing communications is either your consent or our legitimate interests (namely to grow our business).

Under the Privacy and Electronic Communications Regulations, we may send you marketing communications from us if (i) you made a purchase or asked for information from us about our goods or services or (ii) you agreed to receive marketing communications and in each case, you have not opted out of receiving such communications since. Under these regulations, if you are a limited company, we may send you marketing emails without your consent. However, you can still opt out of receiving marketing emails from us at any time.

When you sign up to our email marketing list, or comment on our blogs or products or services, we collect your name and email address. We use **Mailchimp** to manage and send our email newsletters and marketing messages. These may contain tracking beacons/tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of subscriber data relating to engagement, geographic, demographics and already stored subscriber data.

We do this to send you information about us and our products and services and offers that may be of interest or which you have requested and improve what we send out.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us hello@kvcomms.com at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

Cookies are tiny text files stored on your computer when you visit certain some pages or perform certain online actions. Our websites use cookies to distinguish you from other users of our websites and maintain settings and actions that might be important to you – for instance we use a cookie to remember a product you've put in your basket to keep it there for the next time you visit. Cookies help us to provide you with a good experience when you browse our sites.

We may use cookies to perform banner advertising on other websites, with ads that present you with products we think may be of interest.

For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#)

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

On occasion, we may have to share your personal data with the parties set out below:

- External Third Parties such as service providers, professional advisers, HMRC and regulators; and
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. **International transfers**

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA) and/or the UK, eg:

- with our offices outside the EEA and/or the UK;
- with our service providers located outside the EEA and/or the UK;
- if you are based outside the EEA and/or the UK;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and UK data protection law.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission, recognised by the UK government.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe, as recognised by the UK government.

If you would like further information, please contact us using the contact details in clause 1 above.

6. **Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. **Data retention**

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see 'Request erasure' below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us hello@kvcomms.com

If we choose not to action your request, we will explain to you the reasons for our refusal. To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice, and, where applicable, further information to help us search for your personal information, where a specific request is received. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to make the request. We will respond to your request within 1 month of us verifying your identity. You can exercise the above rights and/or manage your information as detailed in the 'Your duty to inform us of changes' section. Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

You can learn more about your rights specific to KV Communications by reading this Privacy Notice or for more general advice, you can refer to here:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Changes to this privacy policy

We may change this privacy policy from time to time – when we do we shall inform you via our website or email.