

## Privacy Notice for Website

### 1 INTRODUCTION

11 This privacy notice and any amended version of it (the “**Notice**”) sets out how V.Group uses the information provided when you use this site. *If you are accessing this website from the Philippines, please see the Privacy Policy (Philippines) at <https://vgrouplimited.com/legal/data-protection-overview-philippines/>*

12 This Notice:

- (a) forms part of V.Group’s Data Protection Policy (<https://vgrouplimited.com/data-protection-overview/>);
- (b) applies to all users of this site; and
- (c) may be amended by V.Group at any time, consistent with the requirements of applicable laws and regulations. Any revisions will take effect from the date on which the amended Notice is published, as indicated by the version number.

### 2 DEFINITIONS

21 “**Personal Data**” is as defined in the Global Data Protection Policy;

“**Sensitive Personal Data**” is as defined in the Global Data Protection Policy; and  
“**V.Group**” means Vouvray Acquisition Ltd and its subsidiaries and/or affiliates.

22 Words denoting the singular shall include the plural and vice versa.

23 Unless otherwise stated, all defined terms have the same meaning as defined in the Global Data Protection Policy.

### 3 INFORMATION COLLECTED

31 When using this site, we may ask you for Personal Data, for example, your name, address or telephone number, email address and/or enquiry details to provide you with the services you wish to make use of. We also collect Personal Data when you voluntarily complete customer surveys, provide feedback and participate in competitions. Unless otherwise agreed with you, we will not collect any Sensitive Personal Data.

32 Where Personal Data is not obtained directly from you but from a third party, the categories of such Personal 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 Personal Data may include the third party’s databases and public sources.

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

#### **4 BASIS FOR PROCESSING**

- 41** We process your Personal Data to provide goods and services to you, for the purposes of our legitimate interests in improving our services, responding to queries, analysing prospective clients, business administration and to comply with legal obligations.

#### **5 USE OF YOUR PERSONAL DATA**

- 51** We use your Personal Data for purposes, including without limitation, the following:

- (a)** to facilitate your use of the site and our services, e.g. personalising repeat visits;
- (b)** to help us analyse people's use of our site to improve the user experience;
- (c)** if you agree, to contact you about other products and services we think may be of interest to you;
- (d)** if you explicitly consent, we shall pass on your Personal Data within V. Group so we may offer you our products and services or to third parties; and
- (e)** in providing our services, we may send your details to, and also use information from, credit reference agencies and fraud prevention agencies.

- 52** We will only collect and use Personal Data in accordance with applicable data protection laws.

#### **6 DATA RETENTION**

- 61** We retain your personal data for as long as necessary to provide our services to you, and no more than 7 years, unless there is a separate legal or regulatory reason for us to retain it for longer. Please refer to our Data Retention and Destruction Policy on our website for more information on this.

#### **7 YOUR RIGHTS**

V.Group will respond to requests made by you to exercise your legal rights in relation to Personal Data that V.Group holds about you. Subject to applicable exemptions, you have the following rights:

- (a)** Right to be informed

Right to be informed about any Personal Data held about you by V.Group.

- (b)** Right of access

Right to request access to Personal Data and be provided information in relation to that data (including the purposes for which the data is processed, how long it will be stored for, the right to lodge a complaint with a supervisory authority).

- (c) Right to rectification  
Right to have any inaccurate Personal Data amended.
- (d) Right to erasure  
Right to have Personal Data erased.
- (e) Right to restrict processing  
Right to restrict processing of Personal Data.
- (f) Right to data portability  
Right to receive a copy of your Personal Data in a machine-readable format or to have your Personal Data sent to another entity.
- (g) Right to object  
Right to object to the processing of your Personal Data, including for marketing.
- (h) Right in relation to automated decision making and profiling  
Right not to be subject to a decision which is based on automated processing or profiling that could result in a significant legal or similar effect on you, such as discriminatory effect.

## **8 RIGHTS REQUESTS**

**81** If making a request to access your Personal Data please follow the instructions at <https://vgrouplimited.com/data-protection-overview/> and send the necessary information to: [dpo@vgrouplimited.com](mailto:dpo@vgrouplimited.com)

## **9 DATA TRANSFERS**

**91** We may transfer data outside of the United Kingdom and European Economic Area as part of our global operations. For further information on the adequate safeguards adopted by us for the international transfer of Personal Data, please see the Data Transfers Policy on our website.

## **10 COOKIES**

**101** Cookies are small text files placed on your computer by websites you visit to help personalise the site for your use and to improve site functionality. Most browsers allow you to turn off cookies. Switching off cookies may restrict your use of a website. By using our website, you agree that we can place the types of cookies referred to above on your device.

**102** Please see our Cookies Statement on our website for further information about the cookies we use on our website.

## 11 OTHER WEBSITES

- 11.1** Our website may contain links to other websites which are outside our control and are not covered by this Policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

## 12 COMPLAINTS AND CONTACT

- 12.1** If you have any concerns, comments or queries regarding our use of your data, please contact [dpo@vgrouplimited.com](mailto:dpo@vgrouplimited.com).

- 12.2** You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address:  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>

- 12.3** For a list of European Data Supervisory Authorities, please see: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)

## 13 DOCUMENT CONTROL

- 13.1** The General Counsel & Company Secretary is the owner of this Notice and is responsible for ensuring, alongside the Global DPO, that this document is reviewed in line with the relevant review requirements.
- 13.2** A current version of the Global Data Protection Policy is available at <https://vgrouplimited.com/data-protection-overview/>
- 13.3** This Notice was approved as stated in this Paragraph and is issued on a version-controlled basis.

Version	Date of Issue	Approved by	Position
1	05.04.2018	Rod Day	Chief Financial Officer
2	28.06.2019	Deborah Grimason	General Counsel & Company Secretary
3	06.12.2021	Deborah Grimason	General Counsel & Company Secretary