



Privacy Policy

Welcome to ZenVa – Virtual Assistance’s Privacy Policy.

Introduction

This Privacy Policy explains how ZenVA – Virtual Assistance (“ZenVA”, “we”, “our” or “us”), a registered sole trader, collects, uses, and shares your Personal Information. There is also an explanation of the data rights you may have with regards to your Personal Information. This Privacy Policy applies to all visitors of ZenVA’s website (www.zen-va.com), to all of the services offered by ZenVA and to all our customers or visitors that otherwise interact with us (“users”, “you” or “your”).

We are committed to respecting your privacy rights and recognise your need for appropriate protection and management of all the Personal Information you share with us. We strive to comply with all applicable laws around the world that are designed to protect your privacy. This policy provides the standard which ZenVA maintains with regard to privacy, even if we are working with legal persons and /or natural persons located outside of the UK, EU or the EEA, in countries which may not require such a high level of protection of Personal Information.

This Privacy Policy is not intended to override the terms of any contract you may have with ZenVA, nor any rights you may have under other applicable data privacy laws.

If you have questions or concerns specifically about this Privacy Policy, please contact us by email at: hello@zen-va.com, with the subject line ‘Privacy Policy Query’.

1. Terminology:

We collect and process Personal Information in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018 (UK GDPR). For the purposes of the UK GDPR, we are the data “**Controller**” of your Personal Information as it is ZenVA that

determines how, when and by which means, a user’s information is processed. The data “**Processor**” is wordpress.com (hosted by hostinger.com) as it processes Personal Information on behalf of the data controller.

“**Personal Information**” is any information relating to an identified or identifiable natural person (“**Data Subject**”). An identifiable natural person can be identified directly or indirectly, particularly by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.



If we handle your Personal Information, then you are the “**Data Subject**”. Data Subjects have certain rights regarding the processing of Personal Information under the UK GDPR as set out in this Privacy Policy.

Our “**Services**” relate to the provision of Virtual Assistant support in areas including but not limited to administration, event planning and project management.

2. The Personal Information We Collect:

To provide you with our Services, we must collect certain Personal Information relating to an identified or identifiable natural person. We collect the Personal Information you provided us with, from your use of our Services, and from other sources, such as partner or client companies we work with. The Personal Information we collect about you includes but it is not limited to:

1. Your name;
2. Your email address;
3. Your address;
4. Your phone number;
5. Financial data you share with us;
6. Details of your current and previous projects with us;
7. Details of your business;
8. Any comments/feedback/reviews/recommendations you leave us;
9. Any other information you include in communications with us.

3. How We Collect Your Personal Information:

We may collect your Personal Information from you based on your use of our website (<https://zen-va.com>), including forms submitted through the website.

If you contact us by (including but not limited to) telephone, email, or the chat box function on our website we will collect the Personal Information you include and process it in accordance with the processes outlined in this policy, including our basis for processing your Personal Information. This may include discussing matters with you relating to an enquiry about our Services or a contract we may have entered into with you. We may also collect Personal Information you have provided to companies that we partner with or are our clients in accordance with their privacy policy.

4. How we Use your Personal Information:

We use your Personal Information for the following purposes:

- To provide and operate our Services, including providing you with Virtual Assistance Services at your request;



- To further develop, customise, expand or improve our Services, based on users' common or personal preferences, experiences and difficulties;
 - To provide our users with ongoing customer assistance and support;
 - To be able to contact our visitors and users with general or personalised service-related notices and promotional messages;
 - To enable users to participate in a prize draw, competition or complete a survey;
 - To help us update, expand and analyse our records to identify new customers;
 - To analyse our performance and marketing activities;
 - To create aggregated statistical data and other aggregated and/or inferred non-Personal Information which we may use to provide and improve our services;
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- To maintain our website. A third party – hostinger.com – provides and maintains our website and we may provide them with Personal Information that has been collected on our website to help us deliver information, and Services;
 - To provide third party suppliers with necessary information, including but not limited to, auditors and accountants. If your Personal Information is to be shared with any other third parties, we will ensure your Personal Information is protected;
 - To comply with any applicable laws and regulations.

ZenVA does **NOT** sell your Personal Information to third parties and ZenVA has not sold Personal Information in the twelve (12) months prior to the effective date of this policy.

ZenVA does not transfer, store and process Personal Data outside of the UK or EU.

We will process your Personal Information if we have a legal basis, as established in this Privacy Policy, or as notified to you at the time we collect your Personal Information, and for the purposes it was collected for, unless we reasonably consider that we need to use your Personal Information for another reason and that reason is compatible with the original purpose. We may process your Personal Information without knowledge or consent where it is required by law.

5. How We Store Personal Information:

Our website is hosted on the hostinger.com platform. hostinger.com provides us with the online platform that allows us to inform you about our Services to you. Your data may be stored through hostinger.com's data storage, databases and the general hostinger.com applications. They store your data on secure servers behind a firewall.

Personal Information derived from non-website generated business is stored on secure servers operated by ZenVA.

6. How we Communicate with Our Site Visitors

We may contact you to notify you regarding your account/ongoing projects, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed, to poll your opinions via surveys or questionnaires, to send updates about our company, or as otherwise necessary to enforce our Terms of Use, applicable national laws, and any agreement we may have with you. For these purposes we may contact you via email, telephone, or webchat.

7. The Basis on Which We Process Your Personal Information:

We rely on the following legal bases to process your Personal Information:

1. **“Legitimate interest”**. Under this legal basis we process your Personal Information if, for example, you have made an enquiry and we need to contact you to respond and resolve this query. We may also have a legitimate interest to contact you about our Services that may be relevant and/or of interest to you as part of our marketing campaigns.
2. **“Necessary for performing a contract”**. Under this legal basis if we enter into a contract with you or are in the process of forming a contract with you and you request certain pre-contractual details, we may need to use your Personal Information to complete such contracts, for example we may need to email you certain documents or call you etc.
3. **“Consent”**. Under this legal basis we may set out specific circumstances where we want to process your Personal Information and request your explicit consent for this. Your explicit consent will usually be in the form of actively checking a tick box or something similar to confirm your consent. For example, unless we have a legitimate interest to contact you about our Services that we would like to market to you, then we would require your consent. Consent can be withdrawn at any point by contacting us at: hello@zen-va.com.
4. **“Compliance with a legal obligation”**. Under this legal basis we may need to process your Personal Information to comply with a common law or statutory obligation, such as disclosures for compliance with HMRC and other such disclosures.

Marketing: the legal basis for marketing promotional materials to you is **“Legitimate Interest”** if we have identified your organisation as an appropriate business to market to. However, all Data Subjects have the right to unsubscribe from such marketing communications. Where we do not have a legitimate interest in marketing to you, we shall seek your consent to do so, and this will form the legal basis for our marketing actions.

8. Your Rights as a Data Subject:

All users have the following rights in relation to their Personal Information:

- **The right to be informed** – you have the right to request information about what the purpose of our processing is and what Personal Information we are processing;



- **The right of access** – you have the right to request and be provided with copies of the Personal Information we are processing as well as a confirmation of the processing we do. You can do this by emailing: hello@zen-va.com, with the subject “Personal Information access request”;
- **The right to rectification** – if you think we have inaccurate or incomplete Personal Information about you then you may inform us, and we shall rectify it;
- **The right to erasure/the right to be forgotten** – we will permanently delete all your Personal Information at your request;
- **The right to restrict processing** – if you are unhappy with how we are using your Personal Information then you can inform us, and we shall cease processing it in that manner;
- **The right to data portability** – if you want us to pass on your Personal Information to someone else then let us know. This transfer should not affect the integrity or otherwise damage your Personal Information;
- **The right to withdraw your consent** – you can withdraw your consent for us to process your Personal Information, if consent is the legal basis for the processing of your Personal Information, at any time by contacting us at: hello@zen-va.com;

If you are unhappy with how we have used your Personal Information, you can register a complaint with the UK Information Commissioner’s Office. If you are based outside the UK, you may also have the right to complain to a privacy and data regulator in the country, state, or province where you are located.

You do not have to pay a fee to exercise any of the above rights, including requesting access to your Personal Information. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive or we may refuse to comply with your request in these circumstances. We aim to respond to all legitimate access requests within one month. It may take us longer than one month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

These rights apply to all users of ZenVa, including residents of California who have certain data protection rights under the California Consumer Privacy Act (“CCPA”). Under this act residents of California may request access to and deletion of Personal Information alongside the other rights detailed above. ZenVa does not discriminate against any user for exercising their rights under the CCPA or any other data protection rights mandated by law or included in this Privacy Policy.

9. Data Retention:

We will retain your information for as long as it is necessary to provide both our Services to you and for our business development purposes.



10. Changes to this Policy:

Changes to this Privacy Policy will be posted on our website from time to time in response to changing legal, regulatory, or operational requirements. Where changes are significant, in our sole good faith discretion, we may also notify you via email prior to these changes becoming effective. Where required by law, we will obtain your consent to such changes. We encourage you to periodically review this page for the latest information on our privacy practices.

Last update: 25/07/22