

The Virtu Group

Privacy Policy

Who we are

We at The Virtu Group Ltd ('we' or 'us' or 'our') are committed to protecting your privacy. We gather and process your personal information in accordance with this privacy policy and in compliance with the relevant data protection regulation and laws. It applies to both our websites <https://scopebetter.com> and <https://thevirtugroup.com> ('websites') as well as our subscription service SCOPE ('subscription service'). It provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

If you do not agree with the data practices described in this policy, you should not use our websites or the subscription service.

Information that we collect

We process your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect is:

- Information about your computer and your visits to our websites and/or subscription service, through cookies and otherwise such as traffic data, location information, logs, IP address, operating system, mobile carrier, or device identifying information. If you wish to change the way cookies work or remove them, you can do so by changing your browser's preferences or settings. Doing so may impact the way our websites/ subscription service appears or functions for you.
- Information that you voluntarily submit to us and that identifies you personally, including contact information, such as your name, email address, agency/company name, company address, phone numbers, and other information about yourself or your company. Data can also include information about any transactions, both free and paid, that your agency/company enter into with us; and information about you that is available on the internet, such as from Facebook, Instagram, LinkedIn, Twitter and Google; it also includes data that you enter into our subscription service including your client contact details.
- Records of correspondence between us and you, for example, records of your and our communication for purposes of support services.
- Comments, posts, or other data you upload to our site, for example, in the comments section of our blog posts.
- Information you provide when subscribing to our events and communications or contacting us.

How we use your personal data

We take your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

The purposes and reasons for processing your personal data are detailed below:

- We use the data we collect from you to provide information, services, or products you have requested or purchased, and to allow you to interact with us, our subscription service and our websites. When applicable we analyse this information to improve the service we provide, and to protect us and you from malicious web activity. This information may be used alone or in combination with your personal data to enhance your experience.
- For the purposes of the GDPR, data entered into our subscription service, such as an agency's client details, rate cards and their scopes of work, the agency is the data controller and we act as a processor. This information is stored and processed on your behalf and is not used for any other purpose. If you require support, our personnel may view your data in order to answer your questions.
- We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests.
- From time to time, we may contact you on behalf of external business partners where we have assessed that it is beneficial to you as a customer and in our interests. In those cases, we do not transfer your data to the third party. In addition, we may share data with trusted partners to contact you based on your request to receive such communications, help us perform statistical analysis, or provide customer support. Such third parties are prohibited from using your information except for these purposes, and they are required to maintain the confidentiality of your information.
- If you give us billing information, we will use it solely to collect payment from your agency/company.
- We may post customer testimonials and comments on our websites and/or social pages, which may contain personal information. Prior consent will always be sought before posting.
- We offer publicly accessible blogs, and community forums. Please keep in mind that if you directly disclose any information through these means, this information may be collected and used by others. We will correct or delete any information you have posted on our websites if you so request.
- We collect and store your personal data as part of our legal obligations and in order to administer, maintain, manage, and improve our business operations.

Your rights

You have the right to access any personal information that we process about you and to request information about:

- What personal data we hold about you.
- The purposes of the processing.
- The categories of personal data concerned.
- The recipients to whom the personal data has/will be disclosed.

- How long we intend to store your personal data for.
- If we did not collect the data directly from you, information about the source.

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Sharing and disclosing your personal information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. The Virtu Group uses third-parties to provide the below services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures. Examples may include:

- Analysing website data - [Google Analytics](#)
- Customer support - [Zendesk](#), [JIRA \(Atlassian\)](#)
- Email communications - [Microsoft](#)
- Marketing assistance – [Hubspot](#), [Mailchimp](#)
- SCOPE subscription service (infrastructure hosting) – [Amazon Web Services](#)
- Survey – [SurveyMonkey](#)

Safeguarding measures

The Virtu Group takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including:

- Encryption using SSL, firewalls and anti-virus/malware.
- Regular review our data collection, storage, and processing practices, including physical and electronic security measures.
- Restricted access to your personal data. Only those employees, agents, and business partners who need access to it in order to deliver requested products and services.
- Employees, agents, and business partners are subject to confidentiality obligations, where violation of which may result in termination and/or liability.
- Employees and agents receive regular appropriate training, including training in information privacy suitable to their respective fields and disciplines.

Transfers outside the EU

We collect information globally and may transfer, process and store your information outside of your country of residence, to wherever we, or our third-party service providers operate for the purpose of providing our services to you. Whenever we transfer your information, we take steps to protect it. These include physical and electronic protections as well as compliance with Standard Contractual Clauses (SCC) the EU-U.S. Privacy Shield Framework and the Swiss-U.S Privacy Shield Framework.

When we and third-party providers transfer information about you, we make use of Standard Contractual Clauses (SCC), which have been approved by the European Commission to safeguard the transfer of information we collect from the European Economic Area, the United Kingdom (the "UK"), and Switzerland.

Consequences of not providing your data

You are not obligated to provide your personal information to The Virtu Group, however, as this information is required for us to provide you with our services and/or serve your legitimate interests, we will not be able to fully offer our services without it.

Legitimate interests

As noted in the 'How we use your personal data' section of this policy, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

We will normally collect personal information from you only where we need the data to perform a contract with you, for example to provide you with our subscription service, where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms, or where we have your consent. In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not and what the possible consequences are if you do not provide your personal information.

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time why we need to use your personal information. If we process personal information in reliance on your consent, you may withdraw your consent at any time.

How long we keep your data

We only ever retain personal information for as long as is necessary and have review and retention policies in place to meet these obligations.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

Sensitive data

We do not intentionally collect sensitive personal data or data from anyone under the age of eighteen (18). By using our websites and/or subscription service, or by submitting any data to us, you warrant that you are eighteen (18) years of age or older.

Marketing

Occasionally The Virtu Group would like to contact you with the product information, events and promotional offers. If you consent to us using your contact details for this purpose, you have the right to modify or withdraw your consent by changing your preferences any time in the profile section of your Scope account or by using the opt-out/unsubscribe options provided.

Additionally, The Virtu Group will occasionally send you product information via email or post that have been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and non-intrusive. You will always have the option to opt out/unsubscribe at any time but please bear in mind that in doing so it may affect the function/experience of the services we are able to provide.

Customers cannot opt out of receiving transactional emails related to their subscription service account.

Corporate events

If we (or our assets) are acquired by another company, whether by merger, acquisition, bankruptcy or otherwise, that company would receive all information gathered by us on our websites and via our subscription service.

Lodging a complaint

The Virtu Group only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

The Virtu Group

Privacy Officer
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+44 203 390 4040

Information Commissioner's Office (ICO)

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SK9 5AF
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+44303 123 1113

Cookie Notice

A 'cookie' is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. When you visit a site that uses cookies for the first time, a cookie is downloaded onto your computer/mobile device so that the next time you visit that site, your device will remember useful information such as items added in the shopping cart, visited pages or logging in options.

Cookies are widely used in order to make websites work, or to work more efficiently, and our websites relies on cookies to optimise user experience and for features and services to function properly.

Most web browsers allow some control to restrict or block cookies through the browser settings, however if you disable cookies you may find this affects your ability to use certain parts of our website or services. For more information about cookies visit <https://www.aboutcookies.org>.