Lionheart Virtual Assistance Ltd's Privacy & Cookie Policy

Our commitment

This privacy and cookie policy will inform you as to how we collect and look after your personal data when you visit our website (regardless of where you visit it from), or when you become a client of ours and when you receive virtual assistant service from us and how the law protects you.

PLEASE READ THIS POLICY CAREFULLY to understand our policies and practices regarding your information and how we will treat it. If you do not agree with the provisions of this Policy, please do not use our website and our services. By accessing or using our website or services, you agree to the terms of this Policy.

Who we are/controller and processor activities

Lionheart Virtual Assistance Ltd (collectively referred to as "we", "us" or "our" in this policy), will be either the data controller or the data processor, depending on what activities we are carrying out.

We will be regarded as the **data controller** when we are directly collecting personal data from you, which is about you. When we are dealing with any personal data about your clients, which you have shared with us, we will be considered as a **data processor**. In those instances, the data processing terms set out in our Virtual Assistant Business terms will apply.

This privacy policy covers our use of data when collected by us in our data controller capacity. So, the data about you as an individual and our client.

If you have any questions about this policy including any requests to exercise your legal rights, or our privacy practices, please contact us in the following ways:

Full entity name: Lionheart Virtual Assistance Ltd
Email address: jennifer@lionheartva.co.uk
Address: Bayside Business Centre, Unit 1 Sovereign Business Park, 48 Willis Way, Poole BH15 3TB

Changes to the Privacy & Cookie Policy and your duty to inform us of changes

We keep our policy under regular review. This version was last updated in August 2025.

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.

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 of every website you visit.

Use of website by children

Our website is not intended for children under 18 years of age. We do not sell products or provide services for purchase by children, nor do we market to children. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Site unless you have consent from a parent or guardian.

If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information.

What information is being collected

We will collect the personal data that you provide to us. 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** including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** including billing address, delivery address, email address and telephone numbers.
- **Financial Data** including bank account and payment card details.
- **Transaction Data** including details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** including internet protocol (IP) address, your login 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** including your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** including information about how you use our website, products and services.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.

We do not monitor your use of the internet, but we do use cookie technology to monitor your use of our website. This information is not stored alongside your personal data and will only be used on an anonymous, aggregated basis. We may process your personal data in combination with the documents and forms that you have completed in order for you to enjoy the materials that we offer for downloading on our website; in order to maintain and improve the facilities we offer; and to send you other potentially interesting materials, tips, blog articles or marketing messages.

How we obtain data
We use different methods to collect data from and about you. Whenever you interact with us, we collect data. Sometimes you provide us with data, sometimes data about you is collected automatically. Here is how and when we do this:

- You contact us via email, telephone or postal mail.
- You enquire about services from us.
- You instruct us to provide virtual assistant and/or bookkeeping services.
- You interact with us on social media sites.
- You opt-in to our marketing communications.
- You sign up to our newsletters on our website, landing pages, emails or social media profiles.

We may also receive your personal data from the following third parties:

- Online virtual assistant or bookkeeping directories where you have posted your interest in virtual assistant or bookkeeping services.
- Social media sites where you have publicised your information.
- Third parties who refer you to us, such as fellow virtual assistants, accountants, business coaches or previous clients.

We may receive technical data from the following parties:

- analytics providers such as Google based outside the UK;
- advertising networks; and
- search information providers.

How we use your personal data
We will only use your personal data when the law allows us to. Usually, 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 obligation**.
- Where you have given us **consent.**

Purpose for which we will use your personal data
We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To respond to your enquiry about our services.	Identity, Contact, Usage, Profile	Performance of a contract with you. Necessary for our legitimate interest (to develop our products/services and grow our business).
To share free resources with you or to make suggestions and recommendations to you about goods or services that may be of interest to you.	Identity, Contact, Technical, Usage, Profile, Marketing and Communications	To pursue our legitimate interest (to develop our products/services and to grow our business).
To register you as a new client and/or provide services to you.	Identity and Contact	Performance of a contract with you. Consent.
To process and deliver a contract including (a) manage payments, fees and charges and (b) collect and recover money owed to us.	Identity, Contact, Financial, Transaction, Marketing and Communications	Performance of a contract with you. Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services and to recover debts due to us).
To manage our relationship with you which will include (a) Notifying you about changes to our terms or privacy policy and (b) Asking you to leave a review or take a survey.	Identity, Contact, Profile, Marketing and Communications	Necessary to comply with a legal obligation.
To enable you to partake in a prize draw, competition or complete a survey.	Identity, Contact, Profile, Usage and Marketing and Communications	Performance of a contract with you. Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business).
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	Identity, Contact and Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise). Necessary to comply with a legal obligation.
To deliver relevant website content and advertisements to you and measure or understand	Identity, Contact, Profile, Usage, Marketing and Communications and Technical	Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to

the effectiveness of the advertising we serve to you.		grow our business and to inform our marketing strategy).
To use data analytics to improve our website, products/services, marketing, client relationships and experiences.	Technical and Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).
Building up a profile of your interests and preferences based on your download history.	Identity, Contact, Profile, Usage, Marketing and Communications and Technical	Necessary for our legitimate interest (improving the content on our website and to support your request for information that you would like to download or have sent to you from our website.

Promotional offers from us and marketing
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 services and offers may be relevant for you (we call this marketing).

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You will receive marketing communications from us if you have requested information from us or purchased similar services from us and you have not opted out of receiving that marketing.

We will never share your personal data with any third party for their own marketing purposes unless we have your express opt-in consent.

You can ask us to stop sending you newsletters and marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time via jennifer@lionheartva.co.uk

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. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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.

Cookies
Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, or make use of e-billing services.
- **Analytical or performance cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Title **Cookie Name**	**Purpose**	**Duration**
cookieyes-consent	CookieYes sets this cookie to remember users' consent preferences so that their preferences are respected on subsequent visits to this site. It does not collect or store any personal information about the site visitors.	1 year
_ga_*	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days
_ga	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.	1 year 1 month 4 days

Please note that third parties may also use cookies, over which we have no control. These third parties may include, for example, advertising networks and providers of external services like web traffic analysis services. These third-party cookies are likely to be analytical cookies or performance cookies or targeting cookies.

We do not share the information collected by the cookies with any third parties.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Except for essential cookies, all cookies will expire after 1 year 1 month 4 days.

Where your data will be located
We will not transfer your data outside the UK. However, some of our external third parties may use servers outside the European Economic Area (**EEA**) so their processing of your personal data may involve a transfer of data outside the EEA. This applies to standard services with reputable suppliers such as Microsoft, Google and Dropbox. Whenever your personal data is transferred out of the EEA, these third parties will ensure a similar degree of protection is afforded to it in compliance with EU data protection laws.

How we keep your data safe
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.

How long we will use your data for
We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, 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, regulatory, tax, accounting or other requirements. In some circumstances you can ask us to delete your data: see 'Your legal rights' below for further information.

Who we may share your personal data with

We may share your personal data with selected third parties exclusively to provide services to you. We may share your personal data with the following parties:

- **Service providers:** these are companies or persons who provide IT and system administration services to us, such as website maintenance, social media management, time tracking management or database management.
- **Professional advisers:** including lawyers, bankers, tax advisors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services to us.
- **Card merchants** who may host your card details for the purpose of any transaction that you may make to us (such as GoCardless, Paypal and Stripe).
- 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.

Third parties will **not** have access to any of your client's confidential information. Any such information will be kept 100% confidential and not be shared with any third party.

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.

Your legal rights

You have the right to:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data** that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data**. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground, as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing of your personal data**. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful, but you do not want us to erase it.
  - Where you need us to hold data that we no longer require as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data** to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use, or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us via email at jennifer@lionheartva.co.uk.

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 could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints

You have the right to complain about how we treat your personal data to the Information Commissioner's Office (the "ICO"). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance at jennifer@lionheartva.co.uk. The ICO can be contacted at:

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113 (UK local rate) or 01625 545 745

Email: icocasework@ico.org.uk or https://ico.org.uk/global/contact-us/email