

## Introduction

This Privacy Policy, in addition to our other Terms of Service and legal documentation, outlines the basis of Virgo Network's data collection and processing activities.

We have made every effort to write this policy (and all our legal documentation) using formats and language that will be easy to understand. We strongly advise you to seek independent advice or counsel if you are unclear on any of the terms or phrases contained in this document, or if you have any uncertainty or doubt regarding the way in which this document will bind you or govern your use of our services.

## Scope and Governance

This documentation is applicable to the provision of all Virgo Networks services, use of our website, and communication with us via e-mail, post, phone or other means.

This documentation forms a binding agreement between Virgo Networks (we, the company) and you (the user, the subscriber, the customer).

Unless otherwise expressly agreed to by Virgo Networks, this agreement and all associated agreements will be enforced and arbitrated under English law. Each Party irrevocably agrees that the courts of England shall have exclusive jurisdiction to settle any dispute or claim (including non-contractual disputes or claims) arising out of or in connection with this Agreement or its subject matter or formation.

**This document was last updated in May 2024.**

<b>Contact Information:</b>	<b>Company Registration Information:</b>
Virgo Networks 9 Bamburgh Road Palmersville Newcastle upon Tyne NE12 9EX United Kingdom  support@virgo-networks.co.uk	Virgo Networks Ltd Registered in England & Wales #07742245 UK Information Commissioners Office registration #ZA902821

## 1. The Information We Collect

Virgo Networks routinely collects the following types of information and data:

- Name
- Company/Organisation Name
- Postal Address
- E-Mail Address
- Phone Number
- IP Address
- Payment method and associated details (.e.g credit card number)

## 2. How and Why Do We Collect Data

Virgo Networks usually collects this data via forms on our website, where the data is entered by you, the user. We collect a limited amount of data automatically when you browse our website, for example, your IP Address. Data may also be collected via e-mail or other contact methods when you contact us.

Virgo Networks collects this data to provide the services that we offer, and to comply with our legal and contractual obligations.

We process your personal data based on the following legal grounds:

- **Contractual Necessity:** To perform the contract with you or to take steps at your request before entering into a contract.
- **Legitimate Interests:** To fulfill our legitimate business interests, provided that your interests and fundamental rights do not override those interests.
- **Consent:** Where you have given consent to the processing of your personal data for specific purposes.
- **Legal Obligation:** To comply with a legal obligation.

## 3. Data Sharing

Virgo Networks DO NOT under any circumstances sell, broker or transact customer/user data with any 3<sup>rd</sup> party, except in the performance of our duties to you or our compliance with law enforcement.

Parties with which we have data sharing agreements are outlined below:

Entity Name	Purpose of Data Exchange	Scope of Exchange
PayPal (Europe) S.à r.l. et Cie, S.C.A. (and group companies)	Payment facilitation	Payment and transactional data
Stripe Inc.	Payment facilitation	Payment and transactional data
GoCardless Ltd.	Payment facilitation	Payment and transactional data
Stargate Holdings Corp (and group companies)	Domain registration services	Domain registrant contact information

## 4. Cookies

Virgo Networks makes use of cookies on our website to maintain login sessions and improve the user experience.

We do not use cookies for the purpose of cross-site tracking, advertising or marketing.

Information about the cookies our systems use is detailed below:

Cookie Name	Location	Purpose
InterWorx-cp	Web control panel	This cookie is used to store your session ID and keep you logged in
WHMCSInstanceID	Client area and order forms	This cookie stores the unique session ID for each visitor and enables variables to pass between page loads. The cookie only contains a reference to a session on the web server. The user's browser won't store any personal information. This is a session-only cookie, so it expires as soon as you close the browser.
WHMCSUser	Client area and order forms	This cookie is used for the remember me functionality of the client area. The system only sets it if a client chose to have the system remember their details, ensuring that they don't need to log in multiple times. It is persistent and lasts for 365 days, or until logout.
GA	All areas of the website, client area and order forms	This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer to help the website analyse how visitors use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States . Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

## 5. Do Not Track

Some web browsers permit the setting of a “Do Not Track” flag, which is intended to notify websites that you do not wish to be tracked.

There is no established standard to determine what this means, and what action should be taken.

Virgo Networks does not perform cross-site tracking, and therefore our website and services do not currently alter their functionality upon receiving this flag from a user’s browser.

## 6. User Age

English law requires a person to be of 18 years or more in age to enter into a binding contract or agreement. The UK-GDPR also requires special measures be implemented for storing data of minors.

Virgo Networks services are therefore only available to and to be used by persons aged 18 or over.

If we discover a user is below the age of 18, we reserve the right to terminate all services and erase data without consideration, compensation or reimbursement of any kind.

## 7. Storage, Security and Data Residency

We commit to following generally accepted standards supplied by the industry in the safeguarding of your data. Where appropriate, data is encrypted.

We retain your data only as long as necessary to provide services you have requested, and for an extended period to facilitate legitimate compliance with our legislative and business obligations. Such extended periods of retention may include:

- Those required by English law, or requested by law enforcement agencies,
- Those mandated by contract, business practice or audit requirements,
- Those required in the performance of our financial reporting responsibilities and
- Those required to protect Virgo Networks from any ongoing litigation or legal action.

Virgo Networks stores all user data within the UK or European Union. Our partners described in section 3. may store your data in other jurisdictions.

## 8. Accessing, Updating or Erasing Data

You can access all your account data from within your account at <https://my.virgo-networks.net>. If you wish to update your data, this can also be done within your account.

Under UK-GDRP and other legislation, you have the right to request that we provide you with, update or erase your data. Please raise a support ticket via your account to begin this process.

For data access requests we may charge a fee to cover the cost of extracting and presenting the data to you. For data erasure requests, we reserve the right to retain data that is required for the reasons set out in our **Storage and security** clauses, where a lawful basis to do so exists.

## 9. Compliance with Legal and Law Enforcement Requests

Virgo Networks has a legal and moral obligation to facilitate legitimate requests by law enforcement agencies, including where such requests mandate the transfer of customer data.

We will review all requests to the best of our ability to ensure their legality and validity. Where permitted, we will notify customers that such a request has been made. In some cases, this may not be possible due to the terms of the request and governing laws.

To date, Virgo Networks the total number of requests that Virgo Networks has received for such data is: 0.