

# **Privacy Policy**

## **Company Details**

Walkthruvisa Ltd is an immigration consultancy, regulated by the Office of the Immigration Services Commissioner under reference number 201500995, having its Registered Office as a limited company, registered in Scotland under SC448707 at Summit House, 4-5 Mitchell Street, EDINBURGH, EH6 7BD.

Our contact details are:

Tel: 0800-086-2468 | Email: info@walkthruvisa.com | Skype: walkthruvisa

#### **Our Undertaking to You**

In this Privacy Statement, we inform you how we collect and use data. Where engaged to act on your behalf, we will use it to look after your interests in the best way we can and to ensure the we can properly act on your behalf. We will make sure we collect and store data which is only relevant to your case and that we hold and retain such data securely and only for as long as we legally require to do so.

# If you're a client of Walkthruvisa Ltd

Due to the nature of our work, we will collect your data from you, which you provide to us. This is either face to face, over the phone (both call and messenger), email, letter or through documents provided through online sharing with Dropbox.

# If you're an employee of a sponsoring employer or a student at a sponsoring institution of education

We may receive your personal data from your employer, your place of studies or your appointed education agent or official financial sponsor.

#### If you are a spouse or family member of someone settled in the UK

We will receive your personal data from either you and/or your UK-based sponsor.

# If you make an enquiry using the form on our website

We will receive your personal data from you when you complete an online signup form. We do not retain your data nor will we contact you for marketing purposes.

#### The types of personal data we collect

We collect name and contact details including your postal address, telephone numbers and email addresses. We collect identification information from you – such as passport, birth, marriage and other formal certifications.

If you become our client, we collect additional personal data such as is necessary to properly represent you and carry out your lawful instructions to us as detailed in our client care agreement. This can include personal, business, financial and employment information, health and medical information, information on your family members and their circumstances, and criminal convictions. We may also collect data about your religious beliefs or sexual orientation, where this is required and relevant to your case.

# What we will do with your personal data?

Where you are our client, we will use your personal data to act on your behalf in the matter or matters in which you have instructed us. These are set out in our client care agreement that you must sign before we commence any work for you.

Where you are not directly a client - such as a member of our client's immediate family as relevant to an application - we will process your data for the purpose of carrying out our client's instructions in a transaction or case in which we're acting.

If you are not a client and completed the contact form on our website, we will use your personal data to respond to your question.



#### You have the following rights in relation to your personal data:

- Access to the personal data we hold about you, free of charge in most cases;
- The correction of your personal data when incorrect, out of date or incomplete;
- Object to the processing of your personal data where we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end;
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- To ask us to delete or erase your personal data (subject to our client care terms within our contract, in the case of clients

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

#### What is our Complaints Procedure?

Our complaints procedure in respect of any legal work we carry out on your behalf is stated in our Terms and Conditions within our client care agreement which is issued to you before any work is started. If you are not a client of the firm, you should write to us at the contact address shown at the beginning of this Privacy Statement

If you are unsatisfied with the manner in which we have dealt with any complaint relating to your personal data, you are entitled to ask the Information Commissioner (ICO) to investigate. We are registered with the ICO with reference number **ZA495185.** 

You will find information on how to raise a concern with the information Commissioner on their website by clicking this link: <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a> If you do not have Internet Access, you can call the Information Commissioner by telephoning 0303 123 1113.

#### On what basis are we processing your personal data?

In order to provide an immigration service - whether consultation, application review or service or any other service or work - we require your personal data to do so. That means we do not seek out specific, unbundled consent because client personal data is necessary for our services to be provided. The legal basis for this is Article 7(4) and Recital 43 of the EU GDPR as adopted into UK law. Therefore, on signing your client care agreement you are also agreeing to our privacy policy.

#### Where you are our client

The lawful basis for processing your personal data is based on the terms we agree with you as set out in our client care agreement and the fulfillment of our contract with you.

### Where you are not a client of the firm and have completed the contact form on our website

The lawful basis for processing your personal data is by your consent which can be withdrawn at any time after which you will receive no further communication from us.

# If another organisation has provided your personal data or if we require to include your personal data to properly transact our client's business

The lawful basis for processing your personal data is the legitimate interests of this company and its clients to properly and lawfully represent our clients' interests.

This lawful basis for processing also applies to personal data of individuals who have no connection with our firm where our clients instruct us to carry out such processing. Examples of such individuals are parents, children and other minor relations.

We may process the data of our client's employer, education provider, financial sponsor and/or landlord. This list is not exhaustive and there are many other instances where we will be required to process personal data as instructed by our clients in order to fully represent their interests.



#### Measures in place to ensure the protection of any Children's or Special Category of data held

We ensure any children's or special category of data we hold are properly stored in our access controlled data store which can only be accessed through a secure username and password. Walkthruvisa Ltd does not maintain paper files on clients. Any brief notes written in the course of a telephone conversation, meeting or during the transaction of a case (such as printing out of a document to check it) are securely shredded and disposed immediately after they are used. All data is only accessed by Euan Fergusson.

Data is stored in our access controlled data store which can only be accessed through a secure username and password.

#### Personal data processed by third parties on our behalf

Your personal data will be processed by third parties with whom we are required to deal with when acting properly and lawfully for you as per your instructions. These may include and are not limited to UK Visas and Immigration both as the Home Office of the United Kingdom or as the Foreign Office of the United Kingdom, their facilitation and third party agents in the relevant country or territory to your case, Secure English language test providers, and appointed Tuberculosis Certification clinics.

We also use the services of third parties to transact our services to you. Examples of such parties include Dropbox which we will use to exchange personal data with you, our website host and developer and Worldpay who process card payment transactions and Santander Bank Plc with whom the company's business account is maintained. This list is not exhaustive and will change from time to time.

Your data may also be accessible by the Office of the Immigration Services Commissioner, through their legitimate interest in monitoring and ensuring the quality of advice provided, limited personal details such as surname and annual case identification may also be accessed by Companies House, our appointed accountants and HM Revenue and Customs in their transacting of Walkthruvisa Ltd's financial and taxation affairs as a limited company.

If you require specific details, please contact us.

## **Our Data Retention Policy**

# Where you are our client:

We will retain your data in accordance with our current data retention policy. This is set out in client care terms – please note that where we have transacted instructions on your behalf, we are legally required through our obligations to the Office of the Immigration Services Commissioner to retain your data securely for a period of 6 (six) years.

#### Where you are not our client:

If you are not a client and completed only an online enquiry form, you can ask us to delete any data we hold at any time.

#### If you are a third party:

We will retain your data in accordance with our client's instructions and any data retained within our digital or paper filing system or storage will be subject to our data retention policy.

Updated: June 2019