

## **UKmarriageVisa.com Privacy Policy**

This Privacy Policy was last updated: 24<sup>th</sup> May 2018

You may have heard about the new General Data Protection Regulation ("GDPR") that comes into effect on the 25<sup>th</sup> May 2018. UKmarriageVisa.com is committed to protecting and safeguarding your personal data. As part of this commitment, we are updating our Privacy Policy to meet the high standards of the new European data protection Law, known as the GDPR. This policy applies to information and services provided by UKmarriageVisa.com to clients in the European Union.

This policy explains what you can expect from us and what we need from you in relation to your personal data. We gather and process your personal information in accordance with this Privacy Policy and in compliance with the new General Data Protection Regulation ("GDPR").

This Privacy Policy provides you with the necessary information regarding your rights and our obligations and explains how, why and when we process your personal data. It is our intention to give you as much control over your personal data as possible to preserve your privacy, while still allowing us to use your personal information to provide a valuable service you have come to expect.

We strongly encourage you to read this Privacy Policy before you provide or share personal information with us or use our website and to read them again when necessary.

### **Why we collect your personal data**

There are a number of different reasons for collecting your personal data.

First and foremost, we collect your personal data, such as your name, email address, contact telephone number, nationality of applicant etc., for legitimate commercial purposes. If we did not collect this data from you, we would not be able to provide free visa eligibility assessments and paid services. We need to better understand how we can help you as a potential client and familiarise ourselves with your personal circumstances so we can realistically assess your chances of obtaining a visa of your choice.

We also collect your personal data from our website in order to provide you with information on our products and services you have expressed an interest in. We will never collect any unnecessary personal data from you and do not process your information in any way other than as specified in our Privacy Policy. We collect and use your personal data only as it might be needed for us to deliver to you our world-class immigration consultancy services, including initial free eligibility assessments.

You are not obligated to provide your personal information to us. However, as this information is required for us to provide you with our services, we will not be able to provide our services without it.

## **What personal data we may collect**

We only collect and use the personal data you give us.

We do not normally obtain any additional information about you from other sources apart from publicly available sources of information, such as Companies House Beta or Land Registry for example.

You may give us information about you when you complete a free eligibility assessment form on our website, retain our services, including any personal information you provide through your continued use of our services. The personal data that we collect from you may include, but not limited to:

- Your name
- Your partner's name
- Your email address
- Your partner's email address
- Your telephone number
- Your partner's telephone number
- Your partner's nationality

### ***Why we need this:***

Immigration requirements vary from country to country. Your partner may be required to pass a mandatory English test and/or undergo medical examination. We need to know your partner's nationality so we can make you aware of any additional "local" requirements.

- Your financial information, such as your occupation, income, savings etc.

### ***Why we need this:***

UK sponsors are required to meet the minimum income threshold as defined by UK Visas and Immigration (UKVI) in order to bring their partner to the UK on a settlement fiancée, de facto or spouse visa. As part of our free initial consultation, we need to discuss your financial situation with you to make sure you satisfy the Home Office income criteria for approval.

- Your accommodation, such as a number of rooms and occupants

### ***Why we need this:***

UK sponsors are required to have suitable accommodation as defined by UK Visas and Immigration (UKVI) in order to bring their partner to the UK on a settlement fiancée, de facto or spouse visa. As part of our free initial consultation, we need to discuss your living arrangements with you to make sure your property meets the Home Office criteria.

- Relationship details, such as your marital status and intended wedding date, if applicable

***Why we need this:***

As part of our free initial consultation, we need to evaluate your relationship with your partner to make sure you have sufficient evidence to demonstrate that your relationship is genuine and subsisting, which is one of the main eligibility requirements under the partner route.

- Your partner's dependent children information

***Why we need this:***

If your partner has dependent children, you may be subject to higher income threshold to qualify as a sponsor as defined by UK Visas and Immigration (UKVI).

- Your previous marriages

***Why we need this:***

We need to discuss this with you to make sure you can provide sufficient proof that your previous marriages and relationships ended (required by UK Visas and Immigration (UKVI)).

- Your partner's travel history

***Why we need this:***

If your partner has any adverse immigration history, e.g. overstay, deportation, administrative removal, it may affect their eligibility and subsequent visa applications in a negative way.

- Your partner's health issues, if applicable

***Why we need this:***

If your partner has health issues, such as tuberculosis (TB), it may affect their eligibility.

- Your partner's criminal history, if applicable

***Why we need this:***

If your partner has convictions on their record, it may affect their eligibility.

In providing the personal data to us during your use of our services, you promise that you have obtained consent from your partner to disclose his/her personal data to us, as well his/her consent to our collection, use and disclosure of such personal data, for the purposes set out in this Privacy Policy.

### **How we collect your personal data**

We collect your personal information in the following ways:

- Information you give us directly - when you sign up for our free consultation and/or purchase a service from us, we will ask you for personal information necessary to provide you with the service you are purchasing, or when we receive information from you verbally by phone or in writing by email or letter, including when you complete our new client questionnaire.
- Information you give us indirectly - when you complete our new client questionnaire, biographical forms, we receive the information you and/or your partner have provided.
- Information we receive from third party companies that you and/or your partner may utilise to obtain the necessary supporting documents, such as divorce decrees, Land Registry records, Companies House records, property inspection reports and accommodation assessments etc.
- When you and/or your partner purchase services on our website - we collect your name, contact information, your credit or debit card number and the card's expiry date.
- When you respond to a survey we may conduct, or fill out a client reference form or similar.
- When you visit our website, Facebook page or any other webpages that we own or manage.
- When you leave feedback/testimonial on our website, Facebook page or any other webpages.
- When you subscribe to our newsletter or mailing list.

### **Cookies**

Cookies and similar online technologies on our website allow us to track your browsing behaviour, links clicked, your device type, and to collect various data, including analytics, about how you use our website and interact with our services. This allows us to provide you with more client-oriented personalised services, a better experience on our sites and mobile applications, and to collect, analyse and improve the performance of our services. We may also collect your location (IP address) so that we can personalise our services according to your geographic location.

For more information about cookies, please visit [www.aboutcookies.org](http://www.aboutcookies.org)

### **How we use your personal data**

UKmarriageVisa.com takes 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 purposes specified below. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

We use your information in the following ways:

- to respond to your specific questions or enquiries;
- to provide accurate and informative visa eligibility assessments;
- to provide you with the information about our professional services;
- to understand and analyse what visa types and services are most relevant to you;
- to carry out our professional obligations relating to your contract with us;
- to deliver, improve, update and enhance any services we provide to you;
- to comply with any applicable legal and/or regulatory requirements;
- to notify you about changes to our professional services;
- to provide regular updates on immigration law, instructions and policies;
- to improve our services and to ensure that they are provided in the most effective manner;
- to understand the effectiveness of our advertising and to deliver relevant advertising to you;
- to administer our professional services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- as part of our efforts to keep our services safe and secure;

### **Disclosure of your information**

We do not sell your personal data or share information about you and/or your partner with any third parties for marketing purposes. As a general rule, UKmarriageVisa.com will not disclose any personal data to any third parties except when we have your permission or under special circumstances, such as when we believe, in good faith, that there is a legal requirement for us to disclose your information.

UKmarriageVisa.com uses third parties to provide the below services. All processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this Privacy Policy, the data protection laws and any other appropriate confidentiality and security measures. We may disclose your personal information for business operations to third party service providers who help us provide our services, including but not limited to: a third party web hosting company that owns its own large data centers (they act in the capacity as a processor on our behalf with respect to the storage of your personal data on their servers); a third party telephone answering service company that handles calls and records customer information on our behalf; and PayPal, the trusted leader in online payments. We utilise third party PayPal services to process client payments.

In providing their services, service providers and processors may access, receive, maintain or otherwise process your personal data on our behalf. Our contracts with these service providers do not permit use of your information for their own purposes, including their marketing purposes. Consistent with applicable legal requirements, we take commercially reasonable steps to require third parties to adequately safeguard your personal data and only process it in accordance with our instructions. We contractually ensure that any third party processing your personal data equally provide for confidentiality and integrity of your data in the most secure way possible.

We reserve the right to transfer any information we have about you in the event that we merge with or are acquired by a third party, or should any such transaction be proposed in the future.

### **Securing your personal data**

UKmarriageVisa.com takes reasonable technical and organisational measures in accordance with the new General Data Protection Regulation ("GDPR") to safeguard its clients' personal information.

We take steps to limit access to your personal data to employees who we believe reasonably need to receive such information to provide our services or in order to do perform their duties. We also work very hard to ensure that our employees are aware of the sensitivity of your personal data submitted to us and that they handle it with care, being careful not to allow any improper access by third parties.

Your personal data may only be accessed by persons within our organisation, or our third party service providers as stated above who require such access to carry out the purposes indicated in this Privacy Policy, or otherwise disclosed to you. However, as in many computer systems, internet applications and software programs, unauthorised use, failure of hardware or software, etc. may be injurious to the confidentiality of users' personal data. We strive to protect your personal data and 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 the use of SSL (secure sockets layer) protocol on our website to maintain a high level of security; password protected access to all systems where your personal data is stored providing the level of access required to fulfil a function; constant software upgrades (including anti-virus software) to eliminate threats; encryption of highly confidential data depending on the sensitivity of the information provided by you.

### **How long we retain your personal data**

We will only retain your personal data for as long as it is necessary to satisfy the purpose for which it was provided by you or collected by us. As a professional immigration consultancy firm, UKmarriageVisa.com is required by law to store some of your personal and transactional data beyond the closure of your case with us. Your data is only accessed internally on a need to know basis, and it will only be accessed or processed if absolutely necessary. We may therefore retain your personal data for a reasonable period (usually not exceeding 7 years) after your last interaction with us.

When the personal data that we collect is no longer required in this way, we destroy or delete it in a secure manner. We may, instead of destroying or erasing your personal data, make it anonymous so that it cannot be associated with or tracked back to you. In certain cases, we may have legal or regulatory obligations that require us to retain specific records for a set period of time. We will always delete data that is not longer required by a relevant law or jurisdiction in which we operate.

UKmarriageVisa.com has established internal policies for the retention of customer personal data for as long as reasonably necessary to fulfill the purposes for which it is collected or to meet legal requirements. We are also required by law in some jurisdictions to retain information about you for a

specified period of time. When we dispose of your data, we will do so in a most secure way possible that prevents it from being disclosed to unauthorised parties.

### **Follow up contact and marketing**

UKmarriageVisa.com may contact you directly or through a third party service provider regarding professional services you have signed up or purchased from us, such as necessary to deliver transactional or service related communications. We may also contact you with offers for additional services we think you may find valuable if you give us consent, or where allowed based upon legitimate interests. We may occasionally contact you to provide updated information on our services and/or immigration policies, including follow up emails and reminders when your and/or your partner's visa is due to expire. Such information will be relevant and beneficial to you as a client and you will always have the option to opt-out/unsubscribe at any time by contacting us.

### **Data storage**

Since we are headquartered and operate outside of the European Union (EU), in order to provide our professional services to you, it is necessary for us to transfer your personal data to our offices that are based outside of the EU. In these cases, we ensure that both ourselves and our employees take adequate and appropriate technical, physical and organisational security measures to protect your data. We also ensure we have appropriate contractual protections in place with any third parties, including web hosting companies whose data centres and servers are based outside of the EU.

If you use our services from a country other than the country where our servers are located, your communications with us may result in transferring your personal data across international borders. Furthermore, when you complete a free assessment form on our website, send us an email, call us to request a consultation or initiate a chat, we may provide you with support from one of our global locations outside your country of origin. Your personal data will be transferred and processed outside of the EU. In these cases, your personal data is handled according to this Privacy Policy.

By purchasing our professional services, or providing your information to us, you consent to the transfer of your personal information outside of the European Union, and our handling of your information in accordance with applicable local requirements and regulations, which may differ from those in the EU jurisdiction in which you currently reside. As a result, this information may be subject to access requests from local governments, courts, or law enforcement outside of the EU.

### **Your rights**

You have the following rights:

- You have the right to ask us to delete your personal data when it is no longer necessary, or no longer subject to a legal obligation to which UKmarriageVisa.com is subject to.

- You have the right to correct any personal information we hold on you and/or your partner that you believe is inaccurate, incorrect, or simply out of date.
- You have the right to opt-out and ask us not to contact you for marketing or routine follow up purposes by contacting us at [info@ukmarriagevisa.com](mailto:info@ukmarriagevisa.com) or calling one of our offices.

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

### **Changes to this Privacy Policy**

UKmarriageVisa.com reserves the right to change or modify this Privacy Policy at any time and in our sole discretion, and we will provide the new Privacy Policy on our website. You agree to the new Privacy Policy by your continued access to and/or use of our website and/or your continued use of our professional services after any such changes. Please periodically review this Privacy Policy so that you know what personal information we collect, how we use it, and with whom we may share it.

### **Contacting us**

If you have any questions, comments, or concerns about our Privacy Policy, please email us at [info@ukmarriagevisa.com](mailto:info@ukmarriagevisa.com) or write to the address provided on our website.

You may contact the national data processing authority in the EU jurisdiction in which you normally reside and access this site from should you have any concerns regarding the processing of your personal data. You can find your local principal GDPR regulator on <https://ec.europa.eu>

### **Accepting our Privacy Policy**

By using this website or providing your personal information to us, you acknowledge your awareness of the terms of this Privacy Policy. If you are not happy with its terms, you are not authorised by UKmarriageVisa.com to use this website and/or purchase our professional immigration services.

24<sup>th</sup> May 2018