

Customer Privacy Statement

Internet Anywhere

V1.0



Whether you are already a customer or have just shown an interest in becoming one will determine the information we collect.

Some of this information includes:

- Your contact details (name, address, email, phone number)
- Date of birth
- Credit card, debit card, bank account and/or other payment information
- Your IP address
- If you've purchased products or services, then their details and how you use them

We can collect information when you:

- Register for information
- Buy a service from us
- Contact us by phone, email, live chat tools or mail.
- Set up your online account
- Visit or browse our website
- Connect with us on social media
- Enter a competition or complete a survey
- Are referred to us by someone else for our products or services

Information we collect from you when you use our products and services:

- Cookies are used on our website to collect information about your use of our website and your online account. Cookies are small text files that are stored on your device(s) – your laptop, mobile phone, tablet etc. and provide a way for the website to recognise you and keep track of your preferences. See our Cookies Policy, which can be found on our website.
- When you use our services, we collect information about your use of those services including the following:
- Call data (i.e. your telephone number, inbound / outbound caller number, time and duration of the call, your device details)
- Usage data (i.e. frequency, time, location and duration of service usage, data traffic (internet / minutes) used per month)
- Billing data (your financial details, bills and its components)
- Payment and transaction data
- Any other data necessary to perform line-of-business duties in relation to any services we provide

Information we can collect from others:

Occasionally we may receive information from third parties to supplement the information we already hold.

This may include:

- Information from other members of your household
- Data received when you are referred to us for our products and services by someone else
- Data from other companies or organisations who you have your consent to share information about you with us
- Information we get from reporting agencies such as credit reference agencies. This is financial information that allows us to assess whether you are creditworthy, confirm your identity, trace and recover debts and prevent criminal activity. Information about you will be exchanged on a continuing basis, including your settled accounts or outstanding debts. Credit reference agencies will share your information with other organisations. Your data will also be linked to the data of your spouse, any joint applicants or other financial associates. The identities of the Credit Reference Agencies and the way they operate are explained in more detail via <https://www.equifax.co.uk/crain>.

Third party data can come from a variety of places including:

- Companies or individuals that introduce you to us
- Credit Reference Agencies
- Fraud Prevention Agencies
- Market Researchers
- Public Information sources such as the electoral roll

Where it's necessary to perform our contract with you:

- To determine if you are eligible for our products and services and whether they're available in your area
- To process your orders for our products and services and to bill you for the same

- To provide you with the products and services you have ordered from us
- To provide access to your online account
- To respond to any questions or complaints you may have regarding our products and services

Where you've given us your consent:

- To send you details of products, services, special offers and rewards that we think will be of interest to you. You can opt out of receiving this information.
- To occasionally carry out market research

Where you have given us your information based on consent, you've the right to withdraw this consent at any time. You can do this by contacting us or calling 01603 755 416 and letting us know your preferences. Prior to the removal of your consent, the legality of anything we've done with your data up until that point will not be affected.

Processing activities based on a legitimate interest are:

- To provide you with information and updates in relation to the products and services you've purchased from us
- To enable us to gain customer feedback
- Defining types of customers for new products or services and personalise service offers to you
- To check your credit information with credit rating agencies to guarantee payment of our services
- Complying with any laws and regulations that apply to us
- To provide you with access to additional services
- To analyse your telephony and mobile internet data to prevent fraud and warn you about nuisance calls
- Insuring against or obtaining professional advice that is required to manage risk

Where we've got a legal obligation to process personal information:

We are required to capture, retain and share some personal data for legal reasons such as:

- When unauthorised or illegitimate content needs to be blocked
- Responding to courts and enforcement authorities
- To help authorities with any security, crime or anti-terrorism enquiries
- To prove compliance with anti-money laundering rules
- To ensure any other regulatory requirements linked with treating customers fairly and processing records properly are completed

HOW WE STORE YOUR INFORMATION

It's hugely important to us that your personal information is secure and protected and we have strict controls in place to make sure it is. For instance, if we share any information with third parties (such as those that provide services to us or act on our behalf), we only do so when we know they value your privacy to our standards. Where we share your personal data with another company, we make sure that they respect your data protection rights too.

Sometimes, we provide information about you to others when required. Such as:

- To our employees and engineers so they can perform installs, provide support and deal with any questions or complaints you've got about your account with us and/or the products and services provided to you by us, now or in the future
- To search the files of a credit reference agency, which will keep a record of that search, when you apply for service. This is so that we can confirm you are eligible for our products and services and guarantee you will make a regular payment for those
- Details of how you conduct your account with us may also be disclosed to the credit reference agency. This information may be used by other organisations in assessing applications from you and members of your household
- For the purposes of fraud prevention and screening preventing nuisance calls
- We may use aggregate information and statistics which can help us develop our services. These statistics do not include information that can be used to identify any individual, and maybe shared with third parties, including content partners and advertisers
- When we create marketing campaigns, special offers and promotions targeted for you with the help of an agency, or our partner companies who provide you with customer service on our behalf or help deliver/provide the product or service you have chosen
- Our service providers for us to provide our services to you, for example upstream network suppliers
- We may share your information to comply with legal and regulatory obligations to protect or enforce our rights or that of a third party such as analysing activity on our network to help block unauthorised or illegal content access or publication; for the purpose of protecting vital interests, national security, statutory obligations or responding to requests from courts and enforcement authorities
- Companies that you ask us to share your data with
- If you use Direct Debit, we'll share your data with the Direct Debit scheme

We won't pass on your personal information to third parties except in accordance with this policy and our Terms and Conditions or where we are required to disclose that information in order to comply with any legal or regulatory requirements.

We'll only keep your information for as long as necessary for cases such as you need to access your records, or there's a dispute that needs resolving.

HOW DO YOU PROTECT MY INFORMATION?

We take the security of your information very seriously. Any information sent to us is protected using robust security methods. The methods we use are industry-standard ensuring data is safeguarded whilst being sent over unprotected communications paths such as the internet. Once we have your data, we store it securely and only provide access to it by authorised personnel. Although we safeguard your personal information once received, We cannot guarantee the safety of any personal information you transmit to us using online methods.

Our security measures include:

- Encryption of data where appropriate
- Regular penetration testing of systems
- Security controls which protect the infrastructure from external attack and unauthorised access
- Training for employees on security and privacy

We'll never ask you for your identification once you are a customer or on-line passwords directly associated with your account in any unsolicited phone calls or unsolicited emails. In accordance with our Terms and Conditions, you are responsible for keeping your password secure and we very strongly recommend you do not disclose it to anyone as this will give them access to your account and personal information, allowing them to potentially incur charges.

HOW DO YOU KEEP MY INFORMATION?

Your data will be collected and stored safely, for the time necessary to operate services provided to you by us and/or based on the reasons that we process your personal data. We will not keep it longer than required, and afterwards it'll either be destroyed or anonymised.

When determining the relevant time we store information periods, we take into account factors such as:

- Legal obligation(s) requiring data to be kept for certain periods of time
- (Potential) disputes
- Guidelines issued by the UK's data protection authority.

A couple of examples of how your data is kept:

- Unless you ask us not to, we store your personal details (i.e. name, surname, contact details) for up to two years after you stop being our customer. This is to allow us to contact you in case you change your mind
- We keep your billing data for 5 years, for tax purposes.

YOUR DATA PROTECTION RIGHTS

It's your right to have access to clear, easy-to-understand information about your details. If any details are inaccurate you have got the right to have them corrected. You also have additional rights such as the right to erasure and the right to restrict processing, which give you more control over your information.

The rights you have regarding your data:

1. **The right to be informed**

You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This Privacy Policy provides all this information.

2. **The right of access**

You can request to know what information we have about you, at any time. So you're aware and can check that we're using your information in accordance with data protection law, you have the right to gain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy).

3. **The right to rectification**

If your information is inaccurate or incorrect you are entitled to have it amended. Just let us know what need to be changed.

4. **The right to erasure**

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.

5. **The right to restrict processing**

You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We will keep a list of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected.

6. **The right to object**

You have the right to object to certain types of processing, including processing for direct marketing. We would only direct market to you with your consent. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

HOW TO COMPLAIN

To exercise any of these rights at any time, contact us on calling 01603 755 416.

If you need any more information about GDPR, or to make a complaint please contact us and ask for a copy of our Customer Complaints Code.