

## PRIVACY POLICY

### AIM

The aim of this policy is to provide you with information about the following:

- What information we collect about you and why;
- How we use this information and for how long; and
- Your rights regarding this information.

We are committed to protecting and preserving your information, being transparent about what data we hold and how we use it. It is important that the personal data we hold about you is accurate and current. It's your responsibility to keep us up to date if you make any changes to your personal data by contacting us.

This Privacy Policy replaces all previous versions and applies from 25<sup>th</sup> May 2018.

### WHO DOES THIS POLICY APPLY TO?

This policy applies to:

- Customers
- Prospective customers
- Individuals that use our websites
- Former customers
- Suppliers

### WHAT INFORMATION WE COLLECT

Personal data is any information that can identify a person. We may collect, use, store and transfer different types of personal data to enable us to deliver our services, as follows:

- a. Data about your Identity including first name, middle names, last name, title, date of birth and gender;
- b. Data about your contact details including service address, correspondence & billing address, email address, landline telephone number and mobile phone number;
- c. Financial data including your bank account details for a direct debit and payment card details including your credit rating;
- d. Data relating to a transaction including details about payments to and from you and details about the products and services that you have purchased from us;
- e. Technical data including IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, webmail emails, and other information on the devices you use to access our services;
- f. Data about your profile including your Account username and password, preferences, feedback and survey responses;
- g. Data about your usage of our products and services including the amount of data used, or when you make a call, the number, destination and length of your call;
- h. Data relating to your marketing and communications choices including what method you would like to receive marketing and how frequently;
- i. Special categories of personal data including information about your health that we may need to know to provide you with the best service for you; and
- j. We may also collect and use non-personal data such as statistical or demographic data. This data may be derived from your personal data but is not considered personal data as this data cannot identify you.

## HOW WE COLLECT INFORMATION

### 1. Information provided by you

When you place an order with us for any of our services (this could be over the phone, online via email, in person or through a third party), we will need certain information to process your order. We may ask for any information that relates to the service you are using or ordering.

When you contact us to discuss your services, we may ask for certain information to be able to confirm your identity, check our records and answer your questions quickly and accurately.

If you complete any survey or enter any competitions we may ask for information about you, which we will make clear to you at the time and for the purpose we will be using this information.

### 2. Information we automatically collect

We will automatically collect information:

- a. when you use our services;
- b. when you visit our websites we may collect and process information about your usage of these by using "cookies" and other similar technologies (see Cookies section below) to help us make improvements to the websites and to the services we make available.

### 3. Information we receive from other sources

We may receive personal information about you from third parties or publicly available sources such as:

- a. companies contracted by us to provide services to you;
- b. other telecommunications operators when transferring services;
- c. marketing organisations; and
- d. credit reference agencies (CRAs) or fraud prevention agencies (FPAs).

## HOW WE USE INFORMATION

The information we collect helps us to improve understanding of what you need from us and helps us to improve the provision of our services to you.

We use the information collected for example to:

- a. verify your identity when you use our services or contact us;
- b. process your enquiries and orders;
- c. carry out credit checks and to manage your accounts (see Credit Checks section below);
- d. monitor, record, store and use any telephone, e-mail or other electronic communications with you for training purposes, so that we can check any instructions given to us and to improve the quality of our customer service, and in order to meet our legal and regulatory obligations;
- e. where you have agreed, provide you with information about other Combitel services, offers or products which may be of interest;
- f. tell you about changes to our websites, services or terms and conditions;
- g. carry out any marketing analysis, profiling or create statistical or testing information to help us personalise the services we offer you and to understand what our customers want;
- h. recover any monies you may owe to us for using our services;
- i. analyse our services with the aim of improving them; and
- j. detect or prevent a crime, fraud or misuse of, or damage to our network, and to investigate where we believe any of these have occurred.

Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law. We may supplement the information directly collected by us with data from third parties (for example socio-demographic data) to further improve the services or products we offer customers.

## CREDIT CHECKS

When you apply to buy products and services from us we may carry out a credit check. This means we may need to check certain records about you, these may include:

- a. our own records;
- b. records at CRAs. When CRAs receive a search from us they may place a search footprint on your credit file that may be seen by other organisations. They supply to us both public (including the electoral register) and shared credit and fraud prevention information. If you tell us about a spouse or financial associate, we will link your records together. CRAs also link your records together, and these searches will be recorded by CRAs. We may disclose information about how you run your accounts to the CRAs;
- c. records at FPAs. We and other organisations may access and use from other countries the information recorded by FPAs; or
- d. if you are a director of an organisation, we will seek confirmation from CRAs that the residential address that you provide is the same as that shown on the restricted register of directors' usual addresses at Companies House.

It is important that you give us accurate information. If you give us false or inaccurate data and we suspect fraud we will record this with the FPAs.

## WHEN WE SHARE YOUR DATA WITH OTHERS

We may need to share your information with other organisations to help us provide our services to you.

Organisations we may share your data with are:

- a. Third party suppliers who help us provide our services;
- b. Professional advisors;
- c. Law enforcement agencies;
- d. Regulators such as Ofcom;
- e. Other companies as part of the process of selling our business or part of our business.

Where we share your information with third parties they are required to follow our express instructions in respect of the use of your personal information and they must comply with all applicable UK data protection laws to protect your information and keep it secure.

## PROTECTING YOUR INFORMATION

We take protecting your data seriously, and will do our utmost to employ appropriate organisational and technical security measures to protect you against unauthorised disclosure or processing.

Unfortunately we cannot guarantee the security of transmitting information via the internet. We have tried to create a secure and reliable website for our users in line with industry standards. However, we have no responsibility or liability for the security of personal information transmitted via the internet.

## WHY WE PROCESS YOUR DATA

We process each type of personal data for one the following reasons:

- a. We need to process the data under our contract with you for our services;
- b. We have a legitimate interest as a business in in processing your data;
- c. We have a legal obligation to process the data; or
- d. We have your consent (which you can withdraw at any time).

If you don't provide us with the data we need then we may not be able to perform our contract with you and may need to terminate the contract. If this happens we will notify you as set out in our Terms and Conditions.

## HOW LONG DO WE HOLD YOUR INFORMATION

The time period for which we keep information varies according to what the information is used for. Unless there is a specific legal requirement for us to keep information, we will keep your information for as long as it is necessary for the purpose for which it was collected.

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 requirements.

We will continue to hold information about you if you do not become our customer, your application is declined or after you have closed your account or terminated your services with us. We will only hold such information for such periods as is necessary for the purpose of dealing with enquiries, offering Combitel products and services you may be interested in, complying with any legal obligation and for crime and fraud prevention and detection.

The law requires us to keep certain information about how you use our services for a specified period. This information may be used by certain law enforcement agencies to prevent and detect crime and to protect national security. We will only disclose this information to them when we are legally required to.

## YOUR RIGHTS

As a data subject you have a number of personal rights under data protection laws in relation to your personal data. These are:

- a. Subject access requests - You have a right to access personal data that we hold.
- b. Right to be forgotten - In certain circumstances you have a right to request that your personal data be erased from the systems within our control.
- c. Rectification - You have a right to correct your personal data that we hold.
- d. Withdraw consent - Where we have offered you the right to consent to giving us your data, for instance with your marketing preferences, you have the right to withdraw your consent at any time.
- e. Objection and restriction of processing - In certain circumstances, you have a right to object to or request we restrict our processing of your personal data.
- f. Right to port – You have a right to receive certain information about you in a machine readable format.

If you would like more information about these rights or how to apply them, please contact us.

## COOKIES

Our websites use cookies. Cookies collect information about your use of our website. The information collected by cookies enables us to understand the use of our site, including the number of visitors we have, the pages viewed per session, time exposed to particular pages etc. This in turn helps us to provide you with a better experience, since we can evaluate the level of interest in the content of our website and tailor it accordingly. We will not attempt to personally identify you from your IP address unless required to as a matter of law or regulation or in order to protect our, or our other customers', rights.

Most browsers automatically accept cookies. You can set your browser options so that you will not receive cookies and you can also delete existing cookies from your browser. However, you may find that some parts of the site will not function properly if you disable cookies.

## CHANGES TO PRIVACY POLICY

Please note that this policy will be reviewed and may change from time to time. The revised policy will be posted on our website so that you are always aware of the information we collect, how we use it and under what circumstances we disclose it.

## **CONTACT US**

If you feel we have breached your privacy, want us to update your marketing preferences, amend your information, or have any questions please contact us either:

### **In writing at:**

Combitel Ltd  
37 Rhos Road  
Rhos-on-Sea  
Colwyn Bay  
Conwy  
LL28 4RS

### **By email at:**

[talk@combitel.co.uk](mailto:talk@combitel.co.uk)

### **By phone at:**

03333 234567