



PRIVACY POLICY

Here at supanet we treat your privacy and the security of your data very seriously. We are open and transparent as to the circumstances in which we collect data from you and more importantly what we do with your data once collected.

What is the aim of this policy?

The aim of this policy is to explain clearly and simply:

- When, how and what information we collect from or about you and why
- How we use the information we collect and what we won't do with it
- The ways in which you can access and manage your information, including how you can request copies of your data
- How we keep your data secure

From time to time we may make changes to this policy (for example to keep pace with best practices or changes in legislation) so we suggest that you check back every now and again so that you make sure you are happy with any changes. For our customers, we will notify as and when changes are made.

Should you have any questions or queries about this policy we would be happy to assist. Please direct your queries to dataprotection@supanet.net

What is the scope of this policy?

This policy applies to anyone who visits our website and/or to anyone who uses any of the services we provide. By subscribing to or using our services, or by visiting our website, you're agreeing to this policy and, importantly, to us using your information in the ways described in this policy.

You should read this policy in conjunction with our terms and conditions (both for the use of our website and the services we provide) as well as, in the case of our customers, any other terms we may provide you with that relate to our services

What information do we collect?

General

We collect information about you when you contact us to enquire about our services and when you subscribe to and use our services. As well as collecting information from you we will also collect information from other organisations, such as credit agencies, as well as from organisations we need to involve or use to provide services to you, for example BT Openreach or wholesale telecommunication providers. In addition to receiving information from other organisations we may also share your information with other organisations so that we can provide the services you order from us and so that we can manage and maintain those services, as well as administer your account with us.

What information do we collect, when and how do we collect it, from where do we collect it and why?

We collect information *directly* from you when:

- you enquire about or place an order for our products and services. We ask you to provide certain information need from you so that we can determine the availability and suitability of our services, explain and discuss services that are available and answer any questions you may have. Calls to our sales lines and enquiries made via 'live chat' or other electronic means may be recorded for quality and training purposes. This information may include your name, address, the proposed service address (if it is different from your current address) your telephone and email contact details as well as information about your current telecommunications services (if any) and your future telecommunications requirements. If you place an order with us we will also need to collect additional information from you to enable us to identify you, process your order, enter into a contract with you and provide you with services. This information may include your date of birth, any previous residential address if you have lived at your current address for less than 3 years and your bank and/or credit card details. We may also need to ask you for other information depending on the nature of your order (for example if you are moving to the service address, your move date).
- contact us to discuss your active services or administer your account

(i.e customer and/or technical support). We may ask you for certain information to confirm your identity, check our records and to enable us to deal with your enquiry quickly and efficiently. Calls to our support lines may be recorded for quality and training purposes.

- sign up for any of our newsletters or mailing lists or to receive service notifications from us so that we can send you what you wish to receive. The information we collect may include your name, address, telephone number and contact email address.

We *automatically* collect information from you when:

- you use the services we provide to you. This includes the IP address of the router and the MAC address of the device you use to connect to your router to access your broadband services, the amount of time you spend online, the websites you visit, the amount of bandwidth you use and, in the case of our telephone services, the number you call, the time of your call, its duration, its destination and how the call is routed. We collect this data, either ourselves or via our wholesale providers, for billing purposes, to manage our network and to comply with our legal obligations.
- visit our website we may collect and process information about how and when you visit and use our site. We do this using 'cookies' and other similar technologies. We explain this in more detail below and in our Cookie Policy, which is available on our website. We do this to help us improve our website and the user experience.

We also collect information about you *from other sources* (i.e third parties) when:

- you place an order for our services we will, with your permission, undertake a credit check with a credit reference agency. In doing so we will receive personal information about you, in particular in relation to your credit history. We use this information to determine whether and on what terms to enter into a contract with you and to prevent fraud. There is a specific section below providing more information about credit checks.
- provisioning our services we may also receive information from other telecommunications providers which is required to enable us to provide services to you .

How we use your information?

We collect information to better understand our customers and those interested in our services and to deliver the best possible service. We respect your data as being yours and will only process it when there is a lawful purpose or need for doing so.

Examples of how we may use your data (the information we collect from and about you) are:

- dealing with enquiries about our services and processing orders you place with us for services. We may use systems that make automated decisions about the products and services we are able to offer you, the terms upon which we are able to contract with you and which wholesale providers we use to provide you with services
- verifying your identity when you contact us or when you use our services
- providing personalised, efficient and co-ordinated customer service, technical support and complaints handling. We may monitor, record, make notes of and store telephone, email, electronic and other communications we may have with you concerning both your services and your account with us. We do this for quality assurance and training purposes, to make sure that we have an accurate record of your instructions and to comply with our legal and regulatory obligations.
- notifying you of changes to our services, prices or the terms upon which the services are made available to you;
- investigating, reporting, logging and resolving any faults or issues in relation to the services
- notifying you of any matters affecting our network and/or your use of the services including any restrictions that may have been placed on your account/service;
- calculating and invoicing you for charges incurred using our services,



processing and collecting payment or charges, communicating with you in relation to billing, payment and credit control matters, including taking steps to recover any monies you may owe us

- investigating and resolving any complaints you may make about our services;
- sending you communications which you have requested and that may be of interest to you
- investigating, preventing or detecting criminal activity, fraud or misuse of, or damage to our network and enforcing our acceptable use policy
- monitoring traffic over our network and other systems for planning, problem solving and security reasons

We may also use your information for other lawful purposes. In some instances we may seek your express and informed consent, where this is required. In other, very limited circumstances, we may use your information where we have a legitimate reason for doing so or in where we are required to use your data to comply with legal and/or regulatory obligations that are imposed upon us.

When do we share your information with others?

We will NOT:

- sell or rent your personal information to third parties
- share your information with third parties for marketing purposes
- share your information other than in accordance with this privacy policy without first obtaining your consent

We may:

- pass your information to third parties including group companies we engage for the purpose of carrying out certain tasks or functions relating to the provision of services to you and administering your account with us (for example undertaking credit checks or setting up and processing direct debit or card payments or outsourcing customer support). The payments you make to us may be processed by third party payment processors, who specialise in the secure capture and processing of credit/debit card transactions and direct debit collections. If you wish to find out more, please contact us. When undertaking credit checks and/or processing payments we may receive information about you from those third party providers. We will hold this information in accordance with this Privacy Policy.
- disclose or transfer your information to a third party in anticipation of or as part of a sale of some or all of our business to any third party or as part of any business restructuring or reorganisation
- disclose your personal information if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, if we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime or to enforce or apply our terms of use or to protect the rights, property or safety of our users and customers.
- share your information for the purposes of any current or future legal proceedings or any alternative dispute resolution process. For example, should you refer any complaint to our alternative dispute resolution provider for determination, we may share with that provider information we have which is relevant to the complaint.
- share your information with debt recovery organisations or legal advisors for the purposes of recovering monies that you may owe us
- provide your information to law enforcement agencies in response to properly made requests relating to the prevention and detection of a crime, for the purpose of safeguarding national security or when the law requires us to
- providing information in circumstances where we are required to respond to properly made requests from regulatory bodies, including the Information Commissioners Office and Ofcom.
- providing information to banks, building societies or credit card companies regarding transactions relating to your account, including but not limited to responding to charge back claims or claims made under the Direct Debit guarantee

Whenever we share your information we will only disclose information to the extent it is necessary and, as far as is reasonably possible, that arrangements are in place to ensure that your information is kept secure, in accordance with applicable data protection legislation and is only used for the purpose for which it is disclosed to them.

There may be occasions when third parties to whom we disclose information are outside the European Economic Area in countries whose laws may not afford the same level of protection of data as those in the European Economic Area or the United Kingdom. Should these occasions arise, we will ensure that your information is not shared until a contract is in place to make sure your information is adequately protected and that appropriate measures are in place with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy.

Credit Checks

When processing your order for products and services we may carry out a credit check. We will ask you before doing so. A credit check involves us checking:

- Our own records
- The records maintained by a credit reference agency. We will share certain information you have provided us with (normally your name, date of birth and address) when submitting our search request together with details of the nature of the services you are ordering. Our search will place a search 'footprint' on your credit file that may be seen by other organisations. We receive information that is both public (including information on the electoral register) and shared credit and fraud prevention information. If you tell us about a spouse or financial associate, we may link your records together. Credit reference agencies may also link your records together, and these searches will be recorded on linked credit files.
- records maintained by fraud prevention agencies

How long to we keep your information?

The amount of time we retain your personal information is subject to regular review and will vary according to the reason for which the information is used. We are legally required to hold some types of information to fulfil our statutory or regulatory obligations (for example we are required by OFCOM to retain recordings of sales calls for not less than 6 months and we are legally required to retain certain information about how you use of our services for a period of 12 months so that it may be made available, subject to a lawful request being made, to law enforcement agencies for the purposes of preventing and detecting crime and protecting national security).

Your personal information will be retained on our systems for as long as is reasonably necessary for the relevant activity, or for as long as you are our customer (or until our performance of the contract is complete) and for a reasonable period of time thereafter.

We will hold information about you if you enquire about services but do not become a customer. We may also continue to hold information 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 you our products and services you may be interested in, complying with any legal obligation and for crime and fraud prevention and detection.

What choices do you have in relation to marketing communications?

When you have given your consent for us to do so, we may contact you with details of products, services and special offers that we believe you may be interested in. Should you decide that you no longer wish to receive marketing communications from us, just contact us you can contact us, either by:

- sending an email to marketing@supanet.net
- calling us on 01282 214 555



and we will update your preferences and stop sending you marketing communications. However, we will continue to send you communications about any services you have with us, for example notifications about any changes to your services or our terms and conditions.

Can you access and update your information?

Yes. The accuracy of your information is really important to us. If your contact or payment details change or any of the other information we hold becomes inaccurate or out of date, please email us at: cs@supanet.net or call us on 01282 214 555 and we will happily update your information.

You have a legal right to request us to provide you with a copy of the information we hold about you without charge. Before complying with your request we may have to ask you to provide or confirm information for the purposes of verifying your identity and for you to provide us with information so that we can comply with your request (for example, your account number, telephone number, address, post code and, if you are requesting a call recording, the date and time of the call and the telephone number from or to the call was made).

If you wish to request copies of your personal information please:

- Write to us at: Data Request, TCS Contact Centre, Time Technology Park, Blackburn Road, Simonstone, Lancashire BB12 7TW; or
- Email us at: datarequest@supanet.net
- Call us on 01282 214 555

Security precautions in place to protect the loss, misuse or alteration of your information

We take steps to ensure that your information is treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Use of 'cookies'

Like many other websites, our website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer, visit our full cookies policy. Turning cookies off may result in a loss of functionality when using our website.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

CONTACT US

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

By letter:

Data Protection – TCS Contact Centre, Time Technology Park, Blackburn Road, Simonstone, Lancashire BB12 7TW

By email:

dataprotection@supanet.net

OUR COMPANY INFORMATION

supanet is a trading name of Supatel Limited, a company incorporated in Cyprus with company registration number 267725 whose registered office address is at:

STADYL Building,
Corner Them.
Dervis-Florinis Street,
CY-1065 Nicosia,
Cyprus

REPRESENTATIVE

Supatel Limited has appointed GR8 Wholesale Communications Limited as its UK representative. You can contact the representative at;

Ribble House, Ribble Business Park, Blackburn, Lancashire, England, BB1 5RB.