

## Privacy Policy and Data Protection

We are aware of our obligations under the General Data Protection Regulation (GDPR) and are committed to processing personal data securely and transparently.

This privacy notice sets out, in line with GDPR, the types of data that we collect and hold. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This notice applies to our current customers and suppliers, our former customers and suppliers and our prospective customers and suppliers.

We have separate privacy notices for:

- Job applicants, which will be issued to anyone applying for a job with us
- Employees, which will be issued to new employees with their offer of employment

### Data Controller Details

The Company is a data controller, meaning that it determines the processes to be used when using your personal data.

Our contact details are as follows:

**Postal Address** – 11 Gandy Street, Exeter, EX4 3LS

**Telephone** – 01392 793127

**Email** – [support@fullfibre.co](mailto:support@fullfibre.co)

### Data Protection Principles

In relation to personal data, we will:

- Process it fairly, lawfully and in a clear, transparent way
- Collect data only for reasons that we find proper for the course of providing our services to customers or engaging the services of suppliers, in ways that have been explained to you
- Only use it in the way that we have told you about
- Ensure it is correct and up to date
- Keep data for only as long as we need it
- Process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate), lost or destroyed

### Types of Data We Process

We hold and process the personal details, including their name, address, email address and phone numbers of:

- Our current customers and suppliers
- Our prospective customers and suppliers
- Our former customers and suppliers

## How We Collect Data (Including Our Use of Cookies)

Data relating to our current, former and prospective customers and suppliers is collected:

- Directly from the customer or supplier, or
- From third parties, such as referrals or recommendations from existing customers and suppliers, former customers and suppliers or other professional acquaintances.

Personal data is kept within the Company's IT systems.

Our website uses 'analytics' cookies for the sole purpose of tracking the performance of our website and understanding more about what is of interest to our website's visitors. We do not and will never use cookies to identify individuals and we do not and will never store personal information in cookies. We do not believe that our use of analytics cookies pose any threat to your personal privacy or online security.

We will not use cookies if you do not agree to their use when accessing our website for the first time or if you set your browser not to allow the use of cookies. If you wish to withdraw your prior agreement to our use of cookies, please contact Customer Services Team ([support@fullfibre.co](mailto:support@fullfibre.co)).

## Why We Process Data

The law on data protection allows us to process your data for certain reasons only:

- In order to perform the contract that we are party to
- In order to carry out legally required duties
- In order for us to carry out our legitimate interests
- To protect your interests and
- Where something is done in the public interest.

All of the processing carried out by us falls into one of these permitted reasons. Generally, we will rely on the first three reasons set out above to process your data.

For example, we need to collect and process the personal data of customers and suppliers in order to perform the contract that we are party to with them and to maintain accurate accounting records in order to carry out our legally required duties.

We also collect data so that we can carry out activities which are in the legitimate interests of the Company. We have set these out below:

- Contacting prospective customers and suppliers
- Tracking the performance of our website and understanding more about what is of interest to our website visitors
- Dealing with legal claims made against us or bringing legal claims against others
- Preventing fraud

## Special Categories of Data

Special categories of data are data relating to:

- Health
- Criminal convictions and offences
- Sex life
- Sexual orientation
- Race

- Ethnic origin
- Political opinion
- Religion
- Trade union membership and
- Genetic and biometric data.

We know that we must process special categories of data in accordance with more stringent guidelines.

**We do not and will not process special category data relating to our customers or suppliers.**

## **If You Do Not Provide Data To Us**

One of the reasons for processing your data is to allow us to carry out our duties in line with a contract that exists between us. If you do not provide us with the data needed to do this, we may be unable to perform those duties.

## **Sharing Data**

Data may be shared with colleagues within the Company where it is necessary for them to undertake their duties.

We may share data with:

- Sage Business Cloud (our accounting system) for the purposes of customer and supplier financial administration;
- Our e-mail and office storage and software provider, Microsoft Office 365
- Azotel (WISP OSS System), Asana (Project Management System), BDNS (Business Driven Network Services) our out of hours support call centre.
- Our legal advisors and HM Courts and Tribunal Services for the defence of any legal claims made against us, or in bringing claims against customers, suppliers or third parties;

We may also share data for other reasons to comply with a legal obligation upon us.

## **Protecting Data**

We are aware of the requirement to ensure data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. Where we share data with third parties, we provide written instructions to them to ensure that data are held securely and in line with GDPR requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of data.

## **How Long We Keep Data For**

In line with data protection principles, we only keep your data for as long as we need it for. Retention periods can vary depending on why we need your data and are set out in our Data Retention Schedule which is available from Customer Services Team ([support@fullfibre.co](mailto:support@fullfibre.co)).

## **Automated Decision Making**

We do not make decisions on the basis of automated decision making (e.g. where a decision is taken using an electronic system without human involvement).

## **Your Rights in Relation to Data**

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- The right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- The right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request
- The right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it
- The right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- The right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- The right to portability. You may transfer the data that we hold on you for your own purposes
- The right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- The right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in a way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact Customer Services Team ([support@fullfibre.co](mailto:support@fullfibre.co)).

## **Making a Complaint**

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.

## **Data Protection Champion**

The Company is not required to appoint a Data Protection Officer. However, the Company's Data Protection Champion is Dan Jones ([dan.jones@fullfibre.co](mailto:dan.jones@fullfibre.co)).

## Disclaimer

We endeavour to update these pages as often as possible, but no responsibility or liability can or will be accepted by Full Fibre Ltd. for any incorrect information, omissions, negligence or inaccuracies including consequential losses arising from use of these web pages and the information contained herein.

### **Cookie use by Google Analytics**

We use Google Analytics for our web statistics, helping us to continually improve our website.

### **Extract from the terms and conditions for the use of the Google Analytics service:**

“This website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.

“Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf.

“Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.”