

PRIVACY POLICY

Here at HS4 Internet (6G Internet trading as HS4 Internet), 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 and how we keep it secure.

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.
- The HS4 Internet website is not intended for use by children and we do not knowingly collect data relating to children.

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, to make sure you are happy with any changes.

Should you have any questions or queries about this policy, we would be happy to assist. Please direct your queries to dataprotection@hs4internet.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.

You provide us information via our website, cookies, web chat functionality, your online account, via social media, when calling us or communicating with us in any other way. Including information relating to: calls on your telephony services, your use of internet services and traffic when we provide you, our services.

As well as collecting information from you we will also collect information from other organisations, such as credit agencies, debt collection agencies and organisations we need to involve or use to provide services to you, for example IX Wireless 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 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 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 (e.g., if you are moving to the service address, your move date).

If you notify us that you are vulnerable, we may record your vulnerability on our systems for the purposes of complying with our Vulnerability Policy and so that you only need to tell us about your vulnerability once.

- You contact us to discuss your active services or administer your account (e.g., 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 maybe recorded for quality and training purposes.

When you check our availability in your area and you do not opt-out from receiving occasional marketing messages via email or SMS about our products and services, including promotions, special offers and discounts. 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.

- You 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 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 (e.g., e third parties) when:

- Provisioning our services. We may also receive information from other telecommunications providers which is required to enable us to provide services to you.
- You place an order for our services and if it is needed, 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.

How do 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 we will only process when there is a lawful purpose or to comply with our legal and/ or regulatory obligations.

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

- 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 personalized efficient and co-ordinated customer service, technical support and complaints handling.
- We may monitor, record, make notes 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 money you may owe us.
- Investigating and resolving any complaints you may make about our services.
- Enabling us to support customers whose circumstances might make them vulnerable in accordance with both our Vulnerability Policy and in compliance with OFCOM's General Conditions of Entitlement (to which we are subject).

- 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?

When we share your information with third parties, they will process your information as either a data controller or as our data processor and this will depend on the purposes to share your personal data with such third party.

We will only share your personal data in compliance with the applicable data protection laws and regulatory requirements.

As well, we may disclose your information to third parties:

- 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 (e.g., 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 reorganization.

- 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 money 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 Commissioner's Office and OFCOM.
- Aggregating information and statistics for the purposes of monitoring website usage, in order to help us develop the website and our services. We may provide such aggregate information to third parties, for example, content partners and advertisers. These statistics will be anonymised and will not include information that can be used to identify any individual.
- Where we use marketing advertisers, we will need to implement a tracking code in our website for the purpose of monitoring sales. We might be sharing customer names and contact information to responding the claims or charges made under our contractual obligations.
- Providing flexible email marketing where we can build and maintain an engaged subscriber lists, made up of people who want to receive marketing communications.
- 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, making sure 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 transfer your personal data are outside the UK / 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 personal data is not shared until a contract is in place that ensures the personal data is made 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.
- Records maintained by fraud prevention agencies.

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 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.

How long do 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 and regulatory requirements.

Your personal information will be retained on our systems for as long as is reasonably necessary for the relevant activity, or if you have been our customer, we will retain your records for 6 years after we stop providing you with our service. After this time, we will securely delete your information.

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 not opted-out of receiving marketing communications from us, we may send you occasional marketing messages via email or SMS about our products and services, including promotions, special offers and discounts.

If you do not wish to receive these messages, you can unsubscribe at any time. Just contact us, you can contact us, either by:

- Clicking the unsubscribe links on any marketing message.
- Sending an email to dataprotection@hs4internet.net
- Calling us on 01282 214000

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.

What are my legal rights in relation to my personal data and how can I exercise those rights?

We want to make sure you are aware of your rights in relation to the information and/or data that we process about you. We have described those rights and the circumstances in which they apply:

Your legal rights

Request Access: this is commonly known as a "data subject access request" which, when made, enables you to receive a copy of personal data we hold about you and to check that we are processing it in accordance with the law.

Request correction: this enables you to have any incomplete or inaccurate data we hold about you corrected, although we may need to verify the accuracy of the new data you provide to us.

Request erasure: you can ask us to delete or remove personal data where there is no good reason for us continuing to process it.

You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed

your information unlawfully or where we are required to erase your personal data by law.

However, this is not an absolute right and we may not be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing: where we are relying on a legitimate interest (or those of a third party): you may object to us processing your personal data based on legitimate interest where there is something about your particular situation that you feel impacts on your fundamental rights and freedoms.

You also have the right to object where we are processing your personal data for direct marketing purposes. We would not be required to cease processing your personal data if we have compelling legitimate grounds to process your information, which override your rights and freedoms.

Request restriction of processing: you can ask us to suspend the processing of your personal data in the following instances: (i) you want us to establish the accuracy of your data; (ii) where we are unlawfully processing your data but you do not wish us to erase it; (iii) where we no longer require your personal data but you need us to retain it (as opposed to deleting it) because you need it to establish, exercise or defend legal claims; or (iv) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data: to you or to a third party: where you have provided and consented to using automated information (or where we used the information to perform a contract with you) you can ask us to transfer the personal data, either to you or to a nominated third party, in a structured, commonly used, machine-readable format.

Withdraw consent at any time where we are relying on consent to process your personal data: where you have provided your consent to the use and processing by us of your data, you can withdraw your consent to future use or processing of that personal data.

Note that this does not prevent the continued processing of your personal data where we have a lawful basis for processing your data that is not based on consent.

How to exercise your legal rights

If you wish to exercise any of the rights set out above, please contact dataprotection@hs4internet.net.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. In either case we will advise you.

In order for us to comply with your request, we may ask you to provide specific information to help us confirm your identity and establish your right to access your personal data (or to exercise any of your other rights).

We do this too for security reasons and to make sure your personal data is not disclosed to any person who has no right to receive it. In certain instances, we may also contact you asking either to confirm your request in writing or to request further information to clarify your request and/or to speed up our response.

How long do we have to respond to your request?

We aim to respond to all legitimate requests within one month. Should your request be particularly complex or you have made a number of requests, it may not be possible for us to respond within one month. In these instances, we will notify you and keep you updated.

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 and in accordance with this Privacy Policy.

We follow strict security procedures as to how your information and/or data is stored, used and who has access.

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, contact number or postcode) 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 – HS4 Internet, Time Technology Park,
Blackburn Road, Simonstone, Lancashire BB12 7TW

By email: dataprotection@hs4internet.net

Further information and complaints

If you wish to find out more about your rights in relation to your data, lots of useful information can be found by visiting the UK Information Commissioner's Office (ICO) website: www.ico.org.uk

If you are not satisfied with our response to your request or believe our processing of your information does not comply with data protection law, you can make a complaint to the ICO: <https://ico.org.uk/concerns>

OUR COMPANY INFORMATION

6G Internet Limited trading as HS4 Internet, a company incorporated and registered in England and Wales. company number 8675607 whose registered office is Ribble House, Ribble Business Park, Blackburn, BB1 5RB.

This statement was last updated on 10th March 2022