

Cromarty Firth Wireless Network - Privacy Policy

Cromarty Firth Wireless Networks Ltd (CFWN) will protect your privacy and ensure we operate in accordance with the EU General Data Protection Regulation ("GDPR") and other Relevant Data Protection Legislation. This applies to you if you are a customer or interact with us as part of running our business, e.g. enquiring about the possibility of becoming a customer.

We need to tell you - What personal data is, how we collect personal data about you, what we collect, how we use it, and how long we keep it, how and if we share this information. What rights you have over it and how to get in touch with us about it. So here we go -

What is "Personal Data"

Where we use the term personal data, we mean information that can connect to you (such as your name, eMail address, address, order information etc).

Personal data collected from our Customers

When you order from us via the website, or by any other means, we collect some personal data about you in order to fulfil your order. This information typically includes; your full name, telephone number, address (including geographic co-ordinates), and eMail address.

We may retain any correspondence including eMail and telephone calls, and use the personal data provided by any means to contact you for legitimate purposes relating to your account such as Invoices, Reminders, and information pertaining to your use or ordering of our services.

We may record certain details of the installation and site survey of your property as notes, diagrams or photos which document the type of installation and any issues with it.

We use this information to perform our obligations under Contract to provide services to you.

If you do not pay your Invoices on time, we may instruct our solicitors or debt recovery agencies to recover what is owed. We will provide them with your personal data necessary to effect this.

We will keep your information until we no longer have any need to communicate with you, and in accordance with our Data Retention Policy.

Like every ISPs and telecoms companies in the UK, we are legally required to retain, and may be asked to release to government and law enforcement agencies certain information under investigatory powers legislation. They might ask for the following details...

- Your contact details.
- Your communications with us, such as calls and emails.
- Your payment and financial information.

- Details of the products and services you've bought **and how you use them** – ***including your call, browsing and IP records.*** *(For the avoidance of doubt, this doesn't mean we record your telephone calls – we don't and won't, but we do have a record of what calls were made and when).*

Personal Data for Marketing

Mostly we restrict our marketing to Facebook and a message put on the end of monthly bills. But it is possible, in the future we will use your personal data to send you marketing that may be of interest to you. We will do this for the legitimate interest we have in promoting our business and providing our customers with information about our offers and services. However, if we should do this in the future then we will provide an opt-out and you may at any time opt-out of such marketing, ensuring your data will not be processed for this purpose.

Use your contact details - including your name, address, phone number, and eMail address - to effectively communicate with you. We may also use information from publicly available sources such as business directories.

If we were ever to send marketing messages, then we might use information about how you use our services to tailor the communications we send to you based on information held; and recommend other products or services that may be appropriate to you

If we ever send you a marketing message, we will provide the means to opt-out from that type of message, or all further communication for marketing purposes. You may also do this at any time by contacting us.

We may contact you for reasons of operating the contract, e.g. to warn you of impending service downtime or other changes to the service which may affect you directly – such communications that are directly relevant to the performance of our duties under any service contract and not for the purposes of marketing will not be removed by opt-out.

Information Sharing

We may share your personal data with other service providers to process personal information on our behalf. We use third party providers to help provide services to you, including to; process payments (such as credit card or Direct Debit).

Where a third party is engaged by CFWN as a processor, we still control your personal data. We only share the data for the purpose which have been explained to you above. We make sure that all our third party processors give sufficient guarantees as to the security and confidentiality of your personal data. We will always have written agreements with the third party processors.

We may also share your information with other controllers of personal data such as authorities (e.g. police, tax, or other authorities) if we are obliged to share information by

law, When your information is shared with these controllers, those controllers will be responsible for your personal data.

We may share your information (limited to property information such as location) with those bodies are responsible for the management of telecommunications activities in the UK such as OFCOM or the Scottish Government R100 team. When your information is shared with these controllers, those controllers will be responsible for your personal data.

Protecting your Information

We will protect your personal data, and have strict procedures and measures in place to do so and employ suitably technical measures to protect your information where appropriate.

The personal information that we hold will be held securely to ensure no unauthorised disclosure or access. The Internet is not a secure medium. We have put in place various security measures, but you are advised to treat the internet as an insecure medium in all of your communications with us.

Data Retention

We will keep your data for an appropriate period of time, and not for a longer period than is necessary for the fulfilment of the purpose it was held for (as detailed above)

We will typically retain your name, address, billing address, products you have ordered, correspondence (including images etc) for a period of six years in accordance with legal requirements (e.g. accounting law).

We may keep details of the survey and installation at your property for as long as there is an installation present at it in order to assist us in resolving problems and providing upgrades to the service.

if you have any concerns how long specific information is held for, please don't hesitate to contact us for clarification.

Cookies

We may use information tracking and gathering technologies that record and store information about users of the Website automatically. This can include using a "cookie" which would be stored on your browser. This information does not identify you personally.

We use this information to help us identify click stream patterns, to improve our Websites and to learn about the number of visitors to our Website and the types of technology our visitors use.

We use cookies based on your 'implied consent', which means that if you continue to use our website, we will assume you are happy for us to set cookies. If you aren't, there are a

number of things you can do, including adjusting your computer's settings to block cookies, or to accept them only on confirmation from you.

Your browser's 'help' option will tell you how to adjust your cookie settings. However, please be aware that if you choose to delete or restrict cookies, some features of our website(s) may not work. You can also visit www.allaboutcookies.org, for more information about cookies and how to manage them.

Your Rights

- You have lots of rights in respect of our processing of your personal data:
- You have the right to be informed how we process your data (hence this notice)
- You have the right to get a copy of the personal data we process about you.
- You have the right to correct the personal data we hold if it is inaccurate.
- You have the right to withdraw your consent freely where it has previously been given.

You have the right to erasure if:

the personal data is no longer necessary for the purposes it was collected for; processing the personal data has been unlawful; or there is a legal obligation under law for us to erase the data. You have the right to request us to restrict the processing of your data if:

the personal data we have about you is inaccurate; the processing is unlawful and you ask us to restrict the use of the personal data instead of erasing it; we no longer need the personal data for the purposes of the processing, but if we still need it for the establishment, exercise or defence of legal claims; or you have objected to the processing claiming that the legal basis of legitimate interest is invalid and are waiting for the verification of this claim. You have the right to object to the processing of your data if:

you can show that your interests, rights and freedoms regarding the personal data outweigh our interest to process your personal data; or we process your personal data for direct marketing purposes without your consent. Please note that the same personal data about you may be used for more than one purpose; so if you object to processing of your data for some purpose, we may still have to retain this information and use it for other purposes as explained above (e.g. retaining order details for tax purposes)

You have the right to data portability:

for personal data that you provided to us; and
if the legal basis for the processing of the personal data is the fulfilment of contract or by consent. We will send a copy of your data in a machine-readable format to you.

If you want to exercise any of these rights, please just contact us.

You also have the right to lodge a complaint about our processing with the Information Commissioner's Office (ICO).

We are registered with the ICO under certificate ref: ZA358720

General

Should you wish to obtain a copy of the personal data that we hold on you, please send an e-mail to enquiries@cfwn.co.uk. As soon as we are satisfied as to your identity, we will send to you a copy of all the data that we hold concerning you.

If you have a complaint regarding any breach of this privacy policy, please contact us at enquiries@cfwn.co.uk.

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