

Associated Telecom Solutions Privacy Policy

Action- Tec Services Ltd T/A Associated Telecom Solutions collects business data in order to provide our services to our business customers. During the relationship there may be times when an individual's data is shared with our partners, for instance the name of an employee of the business for contact purposes. This policy covers how we deal with personal data – which is all data relating to an identified or identifiable individual. We take data protection and complying with data protection legislation very seriously, please find below how we do this.

ATS will be the Controller of the information you provide to us, and that we collect about you, when you visit our website and when we provide you with, or answer questions about, our products and services (i.e. Business Mobile, Broadband, Managed Internet Access, Connecting Sites and VPNs, Phone lines and Systems, Mobile SIMs). Our contact details are below.

This Privacy Policy gives you detailed information on when and why we collect your information, how we use it, and how we keep it secure. Please take a moment to read it so you know what choices and rights you have about the information we may ask you for or collect about you. This policy may change from time to time so it's a good idea to come back and read through it every now and then. If there's a significant change to the policy, we'll let you know. So, let's get into it.

What kind of information do you collect, when and how?

We collect information about you when you:

- order our products or services (whether via this website, over the telephone or with one of our field agents);
- use our products or services;
- contact us by telephone, e-mail or post, to discuss our products or services or to make a complaint;
- visit this website, including speed and service availability checks in your area and different webforms (i.e. Call Back forms);
- Occasionally, we also collect information about you from third parties (e.g. from credit rating agencies, Chat Heroes who monitor our sites.).

The type of information collected depends on the purpose and we will never hold more information from you than is necessary. The following details the types of information collected:

1. When you apply for and/or purchase our products or services or contact us with queries, we will ask you to give us the following information. Your:

- name
- email address
- telephone number

2. When you visit this website, we will use cookies (which are stored on your devices – your laptop, mobile phone, tablet etc.) to collect information about your use of our website. This can include details of your domain name and IP address, operating system, browser version, cookie details and the website you visited before coming to our site.

3. When you use ATS Business services (such as our Business Broadband, Phone lines and Systems, Mobile SIMs), we collect the following information about your use of those services:

- Call data (i.e. your telephone number, inbound / outbound caller number, time and duration of the call, geo-location data, your device details);
- Usage data (i.e. frequency, time and duration of service usage, data traffic (internet / minutes / SMS) used per month);
- Billing data (your financial details, bills and it's components);
- Interactive data (apps usage data, websites usage / visits data).

4. From time to time, to help us provide you with improved products and services, we might ask you to fill in a questionnaire, just so you can let us know how we're doing. When sending you a questionnaire we will ask you to provide us with the following information: name, account number, email address, telephone number.

5. From time to time we acquire personal data from marketing agencies (such as name, surname, phone number) in order to get in touch with you for special offers and promotions if you've agreed so.

6. Other ways we obtain information about you would include:

- Credit Reference Agencies
- Fraud Prevention Agencies
- Market Researchers
- Public Information sources

How will we use the information that we collect?

This section explains how we use the information we hold about you (i.e. what we do with it).

We use the information we hold about you in several ways:

Where it is necessary to perform our contract with your company

- To determine your company's eligibility for our products and services / whether services are available in the companies area;
- To process your company orders for our products and services and to bill for the same;
- To provide your company with the products and services you have ordered from us;
- To provide your company access to privileged areas of our online services.

Where you have given us your consent

- To send you details of products, services, special offers and rewards that we think will be of interest to you. However, we hate junk mail as much as you do so it's up to you to decide whether or not you want to receive this information;
- To occasionally carry out market research;
- To administer contests and competitions and personalise your visits to our online services.

Please note: Where we process your information on the basis of your consent, you have the right to withdraw your consent at any time. You can do this by:

- Writing a letter (see How do I contact you section of this Privacy Notice);
- Sending an email (see How do I contact you section of this Privacy Notice);
- Calling Customer Care (see How do I contact you section of this Privacy Notice).

Where we have a legitimate interest and do not consider your rights will be negatively impacted

- To provide you with service information and updates in relation to the products and services your company has ordered from us;
- To respond to any questions or complaints you may have regarding our products and services;
- To enable us to gain customer insights and to review, develop and improve our products, services and special offers to ensure we are giving customers what they want;
- To check your company's credit information with credit rating agencies to guarantee payment of our services;
- To analyse your companies telephony and mobile internet data to prevent fraud.

Will you disclose information about me to third parties?

This section explains who we share your information with.

We may provide information about you as follows:

- To employees and field agents of ATS to administer, and deal with any questions or complaints you have about any accounts, products and services provided to your company by ATS now or in the future.
- We may use aggregate information and statistics for the purposes of monitoring website usage in order to help us develop the website and our service and may provide such aggregate information to third parties, for example, content partners and advertisers. These statistics will not include information that can be used to identify any individual.
- To search the files of a credit reference agency, where we will keep a record of that search, when your company applies for service. This is so that we can confirm your company's eligibility for our products and services and guarantee a regular payment for those. We'll continue to exchange information about your company with credit reference agencies on an ongoing basis, including about your company's settled accounts and any debts not fully repaid on time. Credit reference agencies will share your company's information with other organisations. The identities of the Credit Reference Agencies and the way they operate are explained in more detail at <https://www.equifax.co.uk/crain>
- Additionally, details of how you conduct your account with us may also be disclosed to the credit reference agency.
- To the marketing agencies we work with when creating marketing campaigns, special offers and promotions targeted for your company.
- We may share your information with our partner companies who provide your company with customer service on our behalf.

How do you protect my data?

This section explains how we protect your information.

Any information sent to us is protected using robust security methods. The methods we use are industry-standard, ensuring data is safeguarded whilst being sent over unprotected communications paths such as the internet. When it reaches us, we store it securely and only provide access to those authorised. Although we safeguard your personal information once received, ATS cannot guarantee the safety of any personal information you transmit to us using online methods.

Our security measures include:

- Encryption of data where appropriate
- Regular penetration testing of systems
- Security controls which protect the ATS Information Technology infrastructure from external attack and unauthorised access
- Regular cyber security assessments of all service providers who may handle your personal data
- Regular scenario planning and crisis management exercises to ensure we are ready to respond to cyber security attacks and data security incidents
- Internal policies setting out our data security approach
- Training for employees on security and privacy

We will never ask you for your ATS Business identification, authentication passwords or PIN numbers directly associated with the services you receive from ATS and its partners in any unsolicited phone calls or unsolicited emails. In accordance with our Terms and Conditions, you are responsible for keeping your password and PIN secure and we very strongly recommend you do not disclose them to anyone (unless you wish to authorise them to access your account and potentially incur charges on your account).

ATS processes public sector customers personal data in accordance with its contractual obligations and solely for the purpose of providing the contracted services and managing and administering the contract.

You use cookies but what exactly are they?

Cookies are small pieces of information stored by your internet browser on to your computer's hard drive. Like most website providers, Virgin Media Business uses cookies to enable us to make a link between you and the information you have provided to our website and therefore provide you with personalised content so that we can give you a better experience when you return. Most web browsers automatically accept cookies, although you can choose not to.

Keeping your information

This section explains how long we will keep your information.

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for; such as any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the following:

- 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
- whether we can achieve those purposes through other means; and
- the applicable legal requirements

Typically we will not keep contract related details for longer than 6 years following the termination of a contract; unless there are compelling reasons to retain for a longer period. We keep your billing data for 7 years for tax purposes.

Afterwards the data will either be destroyed or anonymised.

What rights do I have over the information you hold on me?

This section explains the rights you have over the information we hold about you.

You have the following rights regarding your information:

1. The right to be informed - you have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Privacy Policy.
2. The right of access - you have the right to obtain access to your information (if we're processing it), and other certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information in accordance with data protection law.
3. The right to rectification - you're entitled to have your information corrected if it's inaccurate or incomplete.
4. The right to erasure - this is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. The right to restrict processing - you have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people

who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.

6. The right to data portability - you have rights to obtain and reuse your personal data for your own purposes across different services. E.g. if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.

7. The right to object - you have the right to object to certain types of processing, including processing for direct marketing (which we do only with your consent).

To exercise any of these rights at, any time, you can just:

- Call our Customer Care team on **03300535533**
- Write to us at: Associated Telecom Solutions, 12-14 Court Street, Madeley, Telford Shropshire TF7 5EB.
- Email us at info@associated-telecom.com

If you're not satisfied with our response to your question or concern, or believe our processing of your information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO).

Data Privacy Policy last updated May 2018 but it will be updated regularly to ensure we stay on top of compliance requirements.