

# Privacy Policy

## 1. Important Information And Who We Are

### What Is The Purpose Of This Document?

Southern Communications Group is committed to protecting the privacy and security of your personal information. This privacy notice aims to give you information on Southern Communications Group collects and processes your personal data through your use of our website and during and after the supply of products or use of any of the services provided by us and our group companies.

***This notice applies to anyone who uses our website or who buys or uses any of our products and / or services. We may update this notice at any time.***

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### Controller

Southern Communications Group, including Southern Communications Limited (Company Number: 10053004) whose Registered Office is at Glebe Farm, Down Street, Dummer Basingstoke, Hampshire RG25 2AD, and its subsidiaries (collectively referred to as **Company, we, us, our** in this privacy notice) is the controller and responsible for your personal data. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

### Third-Party Links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. The Kind Of Information We Collect About You



Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The personal information we collect about you will depend on the products and services you use and subscribe to.

We will collect, store, and use the following categories of personal information about you as follows:

- **Identity Data** including personal contact details such as name and title.
- **Contact Data** including addresses, telephone numbers, and personal email addresses.
- **Financial Data** including bank account details, your debit or credit card information, your credit rating information (which we acquire from credit reference agencies) and other banking information.
- **Transaction Data** including your billing history and products and services you use and anything else relating your account.
- **Profile Data** including information you provide to us in your communications with us, information you provide to us when entering prize draws or competitions or participate in surveys.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.

We may also collect **technical data** and information on how you use our products and services, including:

- Your activity on our website.
- The date, time, duration and cost of your communications including your phone location at the time these communications are made.
- The phone numbers that you call and send messages to (and the phone numbers that you receive calls and messages from).
- Your phone or device usage.
- Your data usage.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.



We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If You Fail To Provide Personal Data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **3. How Is Your Personal Information Collected?**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Personal Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

**Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy at <https://www.classnetworks.com/cookie-policy/> for further details.

**Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources, including credit reference agencies or other background check agencies; our partners; and business directories.



We will collect additional personal information in the course of performing our contract with you and in providing our products and services to you throughout the period of your contract with us.

## **4. How We Will Use Information About You**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where we have your consent.
4. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest.

### **Situations In Which We Will Use Your Personal Information**

We need all the categories of information in the list above primarily to allow us to perform our contract with you. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/Activity                                                                                                                                       | Type of data                                                                                        | Lawful basis for processing including basis of legitimate interest                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| To process and deliver your order/contract including:                                                                                                  |                                                                                                     |                                                                                                                     |
| (a) Carrying out our obligations arising from any contracts entered into between you and us;                                                           |                                                                                                     |                                                                                                                     |
| (b) To confirm that your orders have been received and to process them;                                                                                | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Marketing and Communications | (a) Performance of a contract with you.<br>(b) Necessary for our legitimate interests (to recover debts due to us). |
| (c) To provide our products and services;                                                                                                              |                                                                                                     |                                                                                                                     |
| (d) To provide you with the information and services that you request from us;                                                                         |                                                                                                     |                                                                                                                     |
| (e) For billing purposes, to manage payments, fees and charges                                                                                         |                                                                                                     |                                                                                                                     |
| (f) To collect and recover money owed to us                                                                                                            |                                                                                                     |                                                                                                                     |
| To validate you as a registered customer when using our services and calling our customer services.                                                    | (a) Identity<br>(b) Contact                                                                         | (a) Performance of a contract with you.                                                                             |
| To notify you about changes to our services and to make suggestions and recommendations to you about goods or services that may be of interest to you. | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Profile                                         | (a) Necessary for our legitimate interests (to develop our products/services and grow our business).                |
| For the administration of files and records; business management and planning, including accounting and auditing.                                      | (a) Identity<br>(b) Contact<br>(c) Technical                                                        | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services). |

| Purpose/Activity                                                                                                                                                                                                                    | Type of data                                                                     | Lawful basis for processing including basis of legitimate interest                                                                                                                                                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To prevent fraud.                                                                                                                                                                                                                   | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Technical | (b) Necessary to comply with a legal obligation.<br>(a) Necessary for our legitimate interests (to prevent fraud).<br>(b) Necessary to comply with a legal obligation                                                                                    |
| To send certain communications (including by email and SMS) to you including service announcements and administrative messages and other communications relating to our services.                                                   | (a) Identity<br>(b) Contact<br>(c) Technical                                     | (a) Performance of a contract with you.<br>(b) Necessary for our legitimate interests (for running our business, provision of administration services, network security and in the context of a business reorganisation or group restructuring exercise) |
| To ensure security for you and our staff, and help maintain service quality (calls to our customer services may be monitored and/or recorded for authentication, security, quality and training purposes).                          | (a) Identity<br>(b) Contact                                                      | (a) Performance of a contract with you                                                                                                                                                                                                                   |
| To help the emergency services.                                                                                                                                                                                                     | (a) Identity<br>(b) Contact                                                      | (a) Where we need to comply with a legal obligation.                                                                                                                                                                                                     |
| To comply with applicable laws, regulations, court orders, government and law enforcement agencies' requests, to operate our systems properly and to protect ourselves, our users and customers and to solve any customer disputes. | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction                  | (a) Where we need to comply with a legal obligation.                                                                                                                                                                                                     |



Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### **Promotional Offers From Us**

We may use your Identity, Contact, Technical and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

### **Third-Party Marketing**

We will get your express opt-in consent before we share your personal data with any company outside the Southern Communications group of companies for marketing purposes.

### **Opting Out**

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **Cookies**

Our website uses cookies to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse the website and also allows us to improve the website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

## **If You Fail To Provide Personal Information**

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you.

## **Change Of Purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Automated Decision-Making**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

## **5. Data Sharing**

We may have to share your data with third parties, including third-party service providers and other entities in our group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

## **Sharing Personal Information With Third Parties**





We will share your personal information with third parties where required by law, where it is necessary to administer our contract with you or where we have another legitimate interest in doing so.

### **Third-Party Service Providers Who Will Process Your Personal Information**

"Third parties" includes third-party service providers (including our partners) and other entities within our group. A full list is available on request.

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Sharing Personal Information With Other Entities In Our Group**

We will share your personal information with other entities in our group as part of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal information with a regulator or to otherwise comply with the law.

### **International Transfers**

We may transfer your personal information outside the European Economic Area (**EEA**).

If we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; and/or
- using specific contracts approved by the ICO/European Commission which give personal data the same protection it has in the UK and EEA.

## **6. Data Security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **7. Data Retention**

### **How Long Will We Use Your Information For**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the 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 and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We will retain and securely destroy your personal information in accordance with applicable laws and regulations.

## **8. Your Rights Of Access, Correction, Erasure, And Restriction**

### **Your Rights In Connection With Personal Information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Request the restriction of processing of your personal data**, which enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - if you want us to establish the data's accuracy;
  - where our use of the data is unlawful but you do not want us to erase it;
  - you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
  - 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** - we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.



If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact our Data Privacy Officer in writing (see contact details below).

### **No Fee Usually Required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What We May Need From You**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **9. Right To Withdraw Consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Office in writing (see contact details below). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **10. Data Protection Officer**

We have appointed a data privacy officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 11. Changes To This Privacy Notice

This version was last updated on 5<sup>th</sup> October 2023.

We reserve the right to update this privacy notice at any time by updating it online. We may also notify you in other ways from time to time about the processing of your personal information.

### Glossary

#### Lawful Basis

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

#### Internal Third Parties

Other companies in the Southern Communications Group acting as joint controllers or processors and who provide IT and system administration services and undertake leadership reporting.

#### External Third Parties

- Service providers acting as processors who provide IT and system administration services.



- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.