



Claranet privacy policy 2021

claranet[®]

helping our customers
do amazing things

1. Who are we?

Claranet Limited of 110 High Holborn, London, England, WC1V 6JS and its group of companies (www.claranet.com)(“we”, “Claranet”) are committed to protecting and respecting your privacy. For the purpose of applicable data protection legislation, the data controller of your personal information is the Claranet group company(ies) you have contracted with and/or to whom you have granted consent.

2. What does this Privacy Policy do?

- a) Claranet has developed this privacy policy because we want you to feel confident about the privacy and security of your personal information. Claranet takes all reasonable care to prevent any unauthorised access to your personal information.
- b) When we refer to “personal information” in this privacy policy, we mean information that relates to you in circumstances where we can identify you directly or indirectly. We may hold and use personal information about you in your capacity as a consumer, a business customer or as an individual when you visit our websites.
- c) This privacy policy only applies to how Claranet deals with your personal information. It does not apply to your use of services, products or websites made available to you by third parties, even if you access them through Claranet. Please review the applicable privacy policies of such third parties to understand how they use your personal information.

3. What personal information do we collect from you and how do we use it?

We may collect and process the following personal information about you:

- a) Personal information that you provide by filling in forms Claranet provided portals and on our website www.claranet.co.uk/ (“our site”) or Claranet Affiliate websites and portals where applicable. This includes personal information provided at the time of subscribing to our services, posting material or requesting further services. We may also ask you for personal information when you report a problem with our site.
- b) We use this information to provide the services to you that you have requested and which we have agreed to provide to you.
 - Our lawful ground for processing your personal information for this purpose is that our processing is necessary to deliver our services to you, it is necessary for the performance of a contract.
- c) We also collect personal information about your use of our services (such as the amount of time you spend on-line), which we use to manage our network, and for billing purposes.
 - Our lawful ground for processing your personal information for these purposes is that our processing is in our legitimate business interests.

- d) We may ask you from time to time about what use you make of the services we provide, what other services you would like us to provide in the future, and other personal information, such as lifestyle data.
- Our lawful ground for processing your personal information for these purposes is that it is in our legitimate business interests to do so.
- e) We collect personal information about your use of our site and services to help us to make improvements to our sites and to the services we make available to our customers and users.
- Our lawful ground for processing your personal information for these purposes is that it is in our legitimate business interests to do so.
- f) We may also monitor and record our communications with you, including e-mails and phone conversations which may then be used for training purposes, quality assurance, to record details about the products and services you order from us, and in order to meet our legal and regulatory obligations generally.
- Our lawful ground for processing your personal information for training purposes and quality assurance purposes is that it is in our legitimate business interests to do so.
 - Our lawful ground for processing for the remaining purposes described in this section is that our processing is necessary to deliver our services.
- g) We receive information about you from other telecommunications operators where you are also our customer.
- Our lawful ground for processing for the remaining purposes described in this section is that it is in our legitimate business interests to do so.

4. How else do we use your personal information?

4.1. Marketing and Advertising

- a) We may need your personal data in order to send to you marketing materials which we think you may be interested in. In most instances our lawful ground for processing your personal data for marketing purposes is that it is in our legitimate business interest to do so.
- h) Where appropriate, we strive to obtain your consent if we intend to use your personal information for certain other marketing purposes and in these instances our lawful ground for processing your personal data is that you have consented for us to do so.
- i) Where you have consented to us doing so, we may use personal information that you provide directly to us, and/or which we collect about your use of our site and services for marketing purposes, either alone or in combination with personal information that we receive about you from third party companies and organisations. Where we receive personal information about you from such third parties which we use for marketing purposes, this is on the basis that such third parties have obtained your consent to such disclosure to, and use by Claranet.
- j) Where you have consented to us doing so, we may also share your personal information about your use of our site and services with our advertisers and to other companies which offer their goods or services on our websites.

4.2. Credit checking and account management

- a) When you order goods and services from Claranet, we may make enquiries about you for credit reference purposes. These enquiries include searching your records held by a Credit Reference Agency (CRA) and checking any details held on you by Fraud Prevention Agencies (FPA's). When CRA's receive a search from us they will place a footprint on your credit file that may be seen by other organisations. At all times where your personal information is disclosed to us we will protect it in accordance with this privacy policy. We do this to help protect you from identity theft and fraud, and also to prevent and detect crime and money laundering.
- Our lawful ground for processing your personal information for these purposes is that it is in our legitimate business interests to do so.
- k) Personal information on applications will be sent to CRA's and will be recorded by them. We may also give them details of your accounts and billing information, including how you manage it/them to CRA's. We may tell them about payments you make to us, your account balances, and payment defaults. We may also give them historical information we hold about your payment history with us. If you do not pay your bills on time, CRA's will record this information and it may be supplied to other organisations by CRA's and FPA's to perform similar checks and to trace your whereabouts and recover debts that you owe to them as well as us.
- Our lawful ground for processing your personal information for the purposes described in this section is that it is in our legitimate business interests to do so.

5. Do we share your personal information with anyone else?

5.1. External companies

- a) We sometimes use other companies to help us to provide the services that we have agreed to supply to you. To enable them to do this, we may need to share your personal information with them. When we do so, these companies are required to act in accordance with the instructions we give them and they must meet the requirements of applicable data protection legislation when processing your personal information.
- l) Our lawful ground for processing your personal information for the purposes described in this section 5.1 is because it is in our legitimate business interests to do so.

5.2. Lawful requests

- a) We may provide your personal information, in response to lawful requests, for the purposes of the prevention and detection of crime, and the apprehension or prosecution of offenders. We may also provide information for the purpose of safeguarding national security. In either case we do so in accordance with applicable data protection legislation. We also provide your personal information to third parties when required to do so by law, for example under a court order, or in response to lawful demands, under powers contained in legislation.
- m) Our lawful ground for processing your personal information for the purposes described in section 5.2 is because such processing is necessary for us to comply with legal obligations we are subject to

6. For how long does Claranet keep your personal information?

Unless there is a specific legal requirement for us to keep your personal information, we will retain it for no longer than is necessary for the purposes for which the data was collected or for which it is to be further processed.

7. How do we protect your data when it is transferred outside the EEA?

Claranet complies with the rules in applicable data protection legislation governing the transfer of your personal information from countries in the European Economic Area (EEA) to countries outside the EEA. We do sometimes transfer your personal information to a country outside the EEA but before doing so we will take steps to ensure that your personal information is only transferred in accordance with applicable data protection legislation.

8. How do we protect your personal information?

8.1. Security

We are serious about guarding the security of your personal information. We take appropriate organisational and technical security measures to protect your personal information against unauthorised disclosure or processing.

8.2. Passwords

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

8.3. Other security measures

We use various security measures to protect the information we collect, as appropriate to the type of information, including encryption, firewalls, and access controls. Our company databases are accessible only by persons who have entered into and are bound by a confidentiality and nondisclosure agreement with Claranet.

8.4. Internet security and associated risks

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

9. How to access your personal information and your other rights?

9.1. You have the following rights in relation to the personal information we hold about you:

- a) **Your right of access.** If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- n) **Your right to rectification.** If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and its lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- o) **Your right to erasure.** You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where possible and it is lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- p) **Your right to restrict processing.** You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where possible. If you ask us, where possible and it is lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- q) **Your right to data portability.** With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or ask us to transfer this to a third party of your choice.
- r) **Your right to object.** You can ask us to stop processing your personal information, and we will do so, if we're:
 - relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;
 - processing your personal information for direct marketing; or
 - processing your personal information for research unless such processing is necessary for the performance of a task carried out in the public interest.
- s) **Your rights in relation to automated decision-making and profiling.** You have the right not to be subject to a decision when it's based on automatic processing, including profiling, and it produces a legal effect or similarly significantly affects you unless such

profiling is necessary for entering into, or the performance of, a contract between you and us.

- t) **Your right to withdraw consent.** If we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.
- u) **Your right to lodge a complaint with the supervisory authority.** If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

10. Changes to Our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

11. When do we use Cookies?

11.1. Information that can be collected

We may collect information about your computer, including where available your IP address, operating system and browser type, for SYSTEM administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

11.2. The purpose of cookies

Cookies cannot be executed as code or used to deliver a virus. Cookies help us to improve our site and to deliver a better and more personalised service. They enable us:

- a) To estimate our audience size and usage pattern.
- b) To store information about your preferences, and so allow us to customise our site according to your individual interests.
- c) To speed up your searches.
- d) To recognise you when you return to our site.

12. What type of Cookies do we use?

12.1. Types of Cookie

Two types of cookies may be used on this website, session cookies, which are temporary cookies that remain in the cookie file of your browser until you leave the site, and persistent cookies, which remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie).

12.2. Third party advertisements

We may use a third party to serve advertisements on our site. Cookies may be associated with these advertisements to enable the advertiser to track the number of anonymous users responding to the campaign. We do not have access to or control of cookies placed by third parties.

12.3. Third party internet sites

Third party internet sites that you can link to from Claranet's websites are not covered by our privacy policy, so we urge you to be careful when you enter any personal information online. Claranet accepts no responsibility or liability for these sites.

12.4. Additional cookies

Other companies which advertise or offer their products or services on our website may also allocate cookies to your PC. The types of cookies they use and how they use the information generated by them will be governed by their own privacy policies and not ours.

12.5. Deactivating cookies

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

13. Google Analytics

Google Analytics and Google Tag Manager – data protection declaration

We use Google Analytics, a web analysis service provided by Google Inc. ("Google"), pursuant to Article 6 (1) f) GDPR, for the purposes of tailoring our website to meet your needs and ongoing optimisation. In this context, anonymous user profiles are created, and cookies are used. The information collected about your use of our website, such as

- **browser type/version,**
- **operating system**
- **referrer URL (the previously visited page),**
- **host name of the accessing computer (anonymous IP address),**
- **time of the server request**

is transferred to a Google server in the USA and stored there. Google will use this information to evaluate your use of the website to compile reports on website activity for us as website operators and to provide other services associated with the use of the website and the Internet.

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 Inc. under any circumstances.

By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

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 our website and portal.

You may also refuse the use of cookies by selecting the appropriate settings on your browser, which will prevent the collection of cookies-generated data relating to your use of the website and the processing of such data by Google, by downloading and installing the browser plugin available at the following link:

<https://tools.google.com/dlpage/gaoptout?hl=de>

Google Tag Manager is used to implement Google Analytics on our website. The Google Tag Manager is a solution from Google Inc. that enables companies to manage website tags via a single interface. Google Tag Manager is a cookie-free domain that does not collect personally identifiable information. The Google Tag Manager triggers other tags that may themselves collect data. The Google Tag Manager does not access this data. If the user has disabled it at the domain or cookie level, it will remain disabled for all tracking tags implemented with Google Tag Manager.

Deletion of old data, if applicable

If Google Analytics has created user profiles without IP anonymisation, this data has been collected illegally and must therefore be deleted. In the Analytics settings, Google now offers the option of moving so-called "properties" and "data views" to the trash, whereby they are deleted after three (3) months.

14. Helpful definitions

Affiliate means, with respect to any entity, any other entity Controlled directly or indirectly, by the entity, any entity that Controls, directly or indirectly, the entity or any entity directly or indirectly under common Control with the entity;

Control means the beneficial ownership of more than fifty per cent (50%) of the issued share capital or the legal power to direct or cause the direction of the general management or affairs of the company, partnership or other entity in question and "Controls", "Controlled" and "Controlling" shall be construed accordingly.

15. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Claranet Limited, 110 High Holborn, London, England, WC1V 6JS or by email at privacy@uk.clara.net.