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PRIVACY POLICY

The purpose of this document: to reassure you that we will handle your personal data with the respect it deserves and in accordance with the prevailing legislation.

December 2021
Updated January 2024

For the purposes of the General Data Protection Regulation (the 'Regulation'), which came into effect on 25 May 2018, the data controller is Hampshire Broadband Ltd, 5 High Green, Great Shelford, Cambridge, England, CB22 5EG (contact details above).

This privacy policy sets out how Hampshire Broadband Ltd, trading as Hampshire Community Broadband, (herein referred to as HCB, the Company or we/us), collects, uses, stores and processes any information that the customer, (herein referred to as the Customer or you), provides when using HCB's services or its website.

HCB is committed to ensuring that your privacy is protected, and any information is only used as permitted under applicable privacy laws. Should you provide personal information by which you can be identified when using HCB's services or when using our website, your personal information will only be used in accordance with this Privacy Policy.

In order for us to provide you with internet services we subcontract their operation to an Internet Service Providers (full details of whom are available upon request). In respect of the Regulation, the ISP is the data processor. Other telecommunication services may be supplied across our network, for example VOIP services, in which case you will have a separate relationship directly with the said service provider.

Data collection

We may collect and process the following data about you:

- **Information you give us.** You will give us information about you by filling in forms on our website or in person or by corresponding with us by phone, email or otherwise. This includes information you provide when you purchase any of our services, participate in social media functions on our site and when you report a problem. The information you give us may include your name, any relevant business name, address, email address and phone number, financial and bank debit details.
- **Information we collect about you.** With regard to each of your visits to our website, we may automatically collect the following information:
- **Technical information**, including the Internet Protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- **Information about your visit**, including the URLs you access (including date and time) and the pages you viewed or searched for.
- **Information we receive from other sources.** We work closely with third parties (including, for example, consultants, business partners, sub-contractors, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.
- **Communications data.** We may collect and retain certain types of communications data for any of the following purposes; traffic management, billing, customer and prospect enquiries, and antifraud measures. We do not monitor what you do on the Internet, i.e. which web sites you visit or the content of your emails or messages sent via other messaging services. The only exception to this is where we are required to provide certain information in order to enable us to comply with any requirements imposed on us by law or court order.

Hampshire Broadband Ltd is a company registered in England & Wales, number 10669355, at 5 High Green, Great Shelford, Cambridge, England, CB22 5EG

Use of the information held about you

We may use information held about you in the following ways:

- To carry out our obligations and to enforce our rights arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us.
- To allow us to deliver our services to you (including any associated functionality such as parental controls on Internet access, maintenance, assistance or troubleshooting) and to allow us to understand and manage traffic flows on our network.
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our site to ensure that content is presented in the most effective manner for you and the device through which you are viewing the site.
- To allow you to participate in interactive features of our service, when you choose to do so.
- As part of our efforts to keep our site and our services safe and secure.
- To measure or understand the effectiveness of advertising we provide to you and others, and to deliver relevant advertising to you.
- To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- To provide you with information about other services we offer which are similar to those that you have already purchased or enquired about.
- To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box that is displayed on-screen during the check-out process;
- To notify you about changes to our service.
- To ensure that content from our site is presented in the most effective manner for you and for your computer or device.
- To comply with any legal obligations, we have as an Internet service provider.

Information we receive from other sources

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

We may provide links to third parties or may provide access to third party services across our networks. HCB has no responsibility or liability for the information practices of those third parties, and we encourage you to review each third party's privacy policy before disclosing any personal details to them.

Disclosure of your information

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with you.
- Third party web or Internet server and storage companies which operate in the UK or overseas.
- Analytics and search engine providers that assist us in the improvement and optimisation of our website

We may only disclose your personal information to third parties:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of HCB, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- If HCB or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.

Where we store your personal data

The data that we collect from you is primarily stored and managed in the UK, but may be transferred to, and stored at, a destination outside the European Economic Area (EEA). By submitting your personal data, you agree to this transfer, storing or processing. We take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

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 data 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.

Retention of your information

We keep certain information about how you use our Internet services for 12 months. This information may be used by law enforcement agencies to prevent and detect crime and to protect national security (but we only disclose information to them when we are legally required to). If we think there has been crime, fraud, misuse of, or damage to, our network, we will use this information for our internal investigations and any subsequent prosecution(s). We will also provide it in reply to other lawful requests for information.

Your rights

Unless subject to an exemption under the Regulation, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for us to retain such data.
- The right to withdraw your consent to the processing of your personal data at any time.
- The right to request that we provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller (known as the right to data portability) where applicable.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to lodge a complaint with the Information Commissioners Office (contact details below).

You also have the right to ask us not to process your personal data for marketing purposes. We will inform you before collecting your data if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise the right at any time by e-mailing us at support@hampshirebroadband.co.uk.

Our website may, from time to time, contain links to and from the websites of partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Changes to our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on our website and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Privacy Policy.

You can contact the Information Commissioner's Office on 0303 123 1113, via the live chat service of ICO at <https://ico.org.uk/global/contact-us/> or by post at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.