

Hassle Free. Ultrafast Internet

# **Privacy Policy**

#### Version 2 - Effective from 07 May 2024

Squirrel Internet Ltd Registered in England and Wales Company No, 13092404



We take protecting and sharing your personal data seriously. See how we will use and share your personal data.



# 1. Principles

**1.1 Principles** – Squirrel Internet Ltd is the data controller responsible for processing any personal data that you have given us and that we hold on you. We must follow the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. This Privacy Policy lets you know how we collect and use your personal data and tells you about your privacy rights. When we refer to personal data in this Privacy Policy, we mean information which can identify you as an individual. It is important that you read this Privacy Policy so that you are fully aware of how and why we are using your data. We are committed to protecting your personal data and respecting your privacy. We will only use your personal data in the manner described in this document. If you do not agree to the data practices set out in this document we will not be able provide you with our services.

### 2. Information we will collect

**2.1 Identity Data** – This includes your name and any credentials you have created to use our services.

**2.2 Contact Data** – This includes your billing and service installation address, email, telephone or mobile numbers and social media usernames.

**2.3 Financial Data** – This includes bank acccount details for Direct Debit instructions, debit or credit card details and payment history.

**2.4 Order and Transaction Data** – This includes details of the services that you have ordered or are active and any equipment that we have supplied to provide those services. It also includes information on any financial transactions in relation to services we provide to you, such as invoices and payments.

**2.5 Usage Data** – This includes information about how you use our services, our network and our websites. It also includes records of telephone calls made and received by you through our Digital Landline service.

**2.6 Technical Data** – This includes IP addresses assigned to you, bandwidth usage, and whether your service is online and other technical data such as logs. It also includes your login data, browser type and version, operating system and platform, and other technology on the devices you use to access our websites and network. It may also include details of any of devices connected to equipment provided to you as part of our service.

**2.7 Communication Data** – This includes records and content of communication with ourselves such as telephone calls, emails or instant messages that you or we send to each other. It will also include any responses to surveys reviews or feedback.

**2.8 Marketing Data** – This includes records of your preferences for receiving marketing communications from us or our third parties, and any information that we retain regarding which emails and printed material that we might have sent you.

**2.9 Installation Data** – This includes records related to the installation of your services, such as surveys, photos or installation data.

# 3. How we will collect your personal data

**3.1 Identity, Contact and Financial, Order and Transaction Data** – We may collect this data in a number of ways:

- Placing an order for any of our services on our website or a 3rd party website.
- Verbally speaking with one of our customer service agents via telephone or in person.
- Electronically communicating with one of our customer service agents via email or instant message.
- Submitting a paper or electronic order form to us.
- Registering an interest to potentially become a customer in the future.
- Providing new Direct Debit mandate or debit or card details via telephone or online in order to process a payment at your request.
- Requesting marketing information about our products and services or information when our service will be available in your area.
- Responding to any marketing messages, promotions or communications that we may send or post online.
- **3.2 Usage and Technical Data** We may collect this data in a number of ways:
- When you use our services or website, our systems will automatically collect this data.
- You providing logs or other data from your or our equipment
- **3.3 Communication Data** We may collect this data in a number of ways:
- You contacting us via any communication method such as phone, email, instant message or post.
- Us contacting you via any communication method such as phone, email, instant message or post.
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**3.4 Marketing Data** – We may collect this data in a number of ways:

- Signing up to receive marketing information on our website, speaking with one of our customer service agents via telephone in person, or electronically via email or instant message
- Signing up via a 3rd party who will pass the data to us with your consent

**3.5 Installation Data** – We may collect this data in a number of ways:

- You providing it via any communication method such as phone, email, instant message or post.
- Us our our contractors visiting your property as part of a survey or installation.

### 4. Why are we collecting your personal data

4.1 To Process Your Order – If you have placed an order to be able to provide you with the services requested and communicate with you in regards to the delivery of those services.
4.2 To Manage Your Account – Once your service is live to be able to bill you correctly manage your account, communicate with you regarding any important updates and process payments.
4.3 To Troubleshooting Service Issues – To be able to identify or troubleshoot any issues relating to your services or provide assistance using the service or equipment.

**4.4 To Market to You** – To be able to send marketing or service availability updates that you have requested.

**4.5 To Comply with our Legal or Regulatory Obligations** – To be able to comply with any legal or statutory requirement we are subject to.

### 5. Who will we share your data with and why?

**5.1 Sharing data with 3rd parties** – In order to deliver your services and enforce our terms and conditions we may need to share your personal data with one or more 3rd parties. Please see who, why and what they may need your personal data for. In all cases the 3rd party will treat the data in the way described in this privacy policy. They may not use your personal data for any other purpose:

- **Our network or installation contractors** To contact you regarding installing your service, for example to confirm your appointment, let you know they are en-route, discuss an installation issue or fix a fault with your service.
- **Our credit reference agencies** To run a credit check and to report any missed payments to them.
- **Our debt collection agencies** To recover any money you owe to us.
- **Emergency services** In order to assist you in an emergency.
- IT and system service providers In order for to manage and run our internal systems.
   Existing providers and wholesale networks In order to transfer or migrate internet services or telephone numbers from your existing provider.
- **Regulators, Ombudsmen, and Government** To resolve disputes between us, comply with regulatory or legal requirements and to obtain any grants or funding directly or on your behalf
- Any 3rd Party To whom we may sell, transfer or merge parts of our business with.

# 6. How long will we keep your personal data?

**6.1 Retention** – We will only keep your personal data whilst we need it and for the purposes we collected it for. We might also need to retain it to satisfy any legal, accounting, or reporting requirements. The law requires we have to keep basic information about our customers including Identity, Contact, Financial, Order and Transaction Data for at least 7 years after you cease being our customer.

### 7. Your Rights

**7.1 Your Rights** – You have various rights in relation to your personal data – these are set out in detail below:

- Access to Personal Data You have the right to request a copy of data we hold about you, this known as a "Data Subject Data Request".
- **Correction of Personal Data** You have the right to request correction of the personal data that we hold on you. If you are aware of any information that we hold that is incorrect or incomplete, please let us know and we will correct it. We may first need to verify the accuracy of the new data you provide to us, and then we will make the correction.
- **Removal of Personal Data** You have the right to request the removal of your personal data. However, we may not be able to comply with your request of removal, for example, if we are required to retain your personal data for legal reasons, or if that data is required to provide you with service. We will let you know if this is the case.
- **Request Restriction of Processing** You have the right to request we restrict processing your personal data if you do not think the data we hold is accurate whilst we investigate its accuracy. Where our use of the data is illegal but you do not want us to remove it. Where we no longer need to process it but you require us to store it in relation to a legal claim.
- **Transfer Request** You have the right to request your personal data is transferred to you or a third party. Where technically possible we will provide to you, or a third party you have chosen your personal data in a structured, commonly used, machine-readable format.
- **Object to Processing** You have the right to object to us processing your personal data for marketing purposes. You also have the right to object where we are relying on a legitimate interest but you feel the processing impacts on your fundamental rights and freedoms.

# 8. Changes

**8.1 Changes** – Any updates to our privacy policy we will be publised onto our website. You should check periodically for any updates. If you are a customer with active services we will also let you know via email.