

# Privacy Notice

(V2.4 - reviewed March 2020)

**IDNet takes your privacy very seriously and is committed to protecting your personal information.**

**This privacy notice sets out the way in which any personal information we collect from you, or you provide to us, is used and kept secure. It will also tell you about your privacy rights and how the law protects you. It is important that you read this privacy policy together with any other privacy notices 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.**

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## Statement of GDPR Compliance

**When processing personal data, IDNet has adopted the following principles, as laid down in GDPR Regulation:**

- Personal Data shall be processed lawfully, fairly and in a transparent way.
- Personal Data shall be collected for specified, explicit and legitimate purposes only.
- Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Personal Data shall be accurate and kept up to date.
- Personal Data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is processed.

- The integrity and confidentiality of Personal Data is maintained at all times through appropriate technical and organisational measures, including protection against unauthorised or unlawful Processing, and against accidental loss, destruction or damage.

*Note: 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 that contract (for example, to provide you with services). In this case, we may have to cancel a service or order you have with us and we will notify you of this at the time.*

## 1 What data do 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). We may collect, use, store and transfer different kinds of personal data about you as follows:

**IDENTITY DATA:** Title, first name, last name, username or similar identifier.

**CONTACT DATA:** Billing address, delivery address, email address and telephone numbers.

**FINANCIAL DATA:** Bank account and payment card details.

**TRANSACTION DATA:** Payment details or communications to and from you and other details of products and services you have purchased from us.

**TECHNICAL DATA:** Internet Protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**PROFILE DATA:** Your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

**USAGE DATA:** Information about how you use our website, products and services.

**COMMUNICATION PREFERENCES:** Your preferences in receiving marketing, offers and newsletters from us.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not 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 identify you in any way, we treat the combined data as personal data and it 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).

We do not collect any information about criminal convictions and offences.

## 2 How is your personal data collected?

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

**DIRECT INTERACTION:** You may give us your Identity, Contact and Financial 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 services or newsletters; request marketing to be sent to you; enter a competition, promotion or survey; or give us some customer feedback.

**AUTOMATED TECHNOLOGIES OR INTERACTIONS:** As you interact with our website, we may 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. Please see our [cookie policy](#) for further details.

**THIRD PARTIES OR PUBLICLY AVAILABLE SOURCES:** We may receive personal data about you from various third parties and public sources as set out below: Technical Data from analytics providers such as Google based inside and outside the EU; Contact, Financial and Transaction Data from providers of technical, payment and installation services such as Equifax or BT based inside and outside the EU; Identity and Contact Data from

data brokers or aggregators based inside the EU. Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### 3 How do we use your personal data?

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

- Where we need to perform a contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate business interests (or those of a third-party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

In the table below, we list 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.

<b>PURPOSE/ACTIVITY</b>	<b>TYPE OF DATA</b>	<b>LAWFUL BASIS FOR PROCESS-ING INCLUDING BASIS OF LEGITIMATE INTEREST</b>
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Asking you to leave a review or take a survey (c) Providing information to you to meet our regulatory obligations	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/ services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about products or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business.</p>

*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.*

## 4 Disclosure of your data

We will not transfer any of your data to third parties without your permission or unless indicated in this privacy policy or agreed by you in the acceptance of our terms and conditions of business when purchasing our products and services.

We will never share or sell your data to third parties for the purposes of marketing.

Note: In order to fulfil contractual arrangements we have with you, we may need to appoint other organisations to carry out some of data processing activities on our behalf. These include, for example, payment processing organisations, delivery organisations, fraud prevention, and credit risk management companies.

## 5 Data Security

We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third-parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

## 6 How Long Will We Keep Your Personal Data?

Your information may be retained for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirement.

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.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 7 What Are Your Rights?

Under GDPR your rights include:

**REQUEST ACCESS TO YOUR PERSONAL DATA** - (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. Note that we may refuse to comply with a request for access if the request is manifestly unfounded or excessive, or repetitive in nature.

**REQUEST CORRECTION OF YOUR PERSONAL DATA** - this enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. Note that we may refuse to comply with a request for correction if the request is manifestly unfounded or excessive, or repetitive in nature.

**REQUEST ERASURE OF YOUR PERSONAL DATA** - this enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note that we may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims.

**REQUEST RESTRICTION OF PROCESSING YOUR PERSONAL DATA** - this enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. Note that we may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive, or repetitive in nature.

**REQUEST TRANSFER OF YOUR PERSONAL DATA** - 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 where your personal data is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.

**RIGHT TO WITHDRAW CONSENT** - you can withdraw your 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.

## 8 Access to your information and correction requests

You have the right to request a copy of the information we hold about you. This is known as a “subject access request”.

If you would like a copy of your personal information, please email [support@idnet.com](mailto:support@idnet.com) or write to us at the address below.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 30 days of receiving it.

We want to make sure that your personal information is accurate and up to date. You have the right to ask us to correct or remove information you think is inaccurate.

## 9 How to contact us

To contact us regarding your personal data and GDPR, including to make a subject access request, please contact the support desk using the details below:

Email: [support@idnet.com](mailto:support@idnet.com) Telephone: 01462 656 700

Postal Address: Bridge House, 30A Bridge Street, Hitchin, Herts, SG5 2DF