

## **PRIVACY NOTICE**

This privacy notice ("Privacy Notice") explains how we collect, use and share personal data in the course of our business activities.

This Privacy Notice may be updated from time to time. We therefore ask you to consult it on a regular basis. The last line of this Privacy Notice below indicates when the Privacy Notice was last updated.

### **ABOUT US**

G.Network Communications Ltd ("G.Network", "we", "us") is a full fibre internet service provider ("ISP"). We're a limited company registered in England and Wales under company number 10057745 and our registered office and main trading address is at 58 Grosvenor Street, Mayfair, London W1K 3JB. Our VAT number is 242 5656 07.

We're regulated in the UK by Ofcom. We're also a member of Ombudsman Services (an independent alternative dispute resolution service).

### **ABOUT THIS PRIVACY NOTICE**

G.Network is committed to protecting and respecting your privacy. This Privacy Notice (along with any of our other terms and conditions that apply to you) sets out when and how we'll process any personal data we collect from you, or that you provide to us. Please read this Privacy Notice carefully, to understand this. When we refer to "personal data" in this Privacy Notice, we mean information, which can identify you either directly or indirectly as an individual. Processing personal data can include obtaining, recording, holding, using, disclosing or erasing it.

For the purpose of the General Data Protection Regulation (the "GDPR"), the data controller is G.Network Communications Ltd of 58 Grosvenor Street, Mayfair, London W1K 3JB.

Our Data Protection Officer is Shawn Nolan, who can be contacted at the following email address: support@g.network, or by post at the address stated above.

Our website www.g.network ("Website") may, from time to time, contain links to and from the websites of our partner networks, advertisers and others associated with us. If you follow a link to any of these websites, please note that these websites have their own privacy and cookie policies. G.Network accepts no responsibility or liability for these policies. Please check these policies before you send any personal data to these websites.

### **INFORMATION WE MAY COLLECT FROM YOU**

#### **Residential customers**

If you purchase products or services from us as a residential customer (i.e as a private consumer), either via (i) our Website; (ii) calling our customer service agents; or (iii) submitting a paper order form to us, we may collect and process personal data about you, such as your:

- name;
- title;
- address;

- email address;
- bank details; and
- date of birth.

• If you (or someone using your G.Network broadband or telephone service) use G.Network's network to make a telephone call or connect to the internet, we keep a record of that call (including the number called) so we can charge for it. We also receive information from other operators about calls made over our network, where we need that information for connecting and billing purposes.

• If you abuse or damage the G.Network telephone network, for example by making offensive or nuisance calls, we may keep information relating to that abuse.

• If you abuse our internet service or any other services we provide, for example by not following any part of our **Fair Usage Policy**, we may keep any information relating to that abuse.

• We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them. These surveys are sent to gauge customer satisfaction, and are not promotional or marketing communications.

• If you contact us, we may keep a record of it and what you say to us.

• We may hold information about your use of our services (such as the amount of time you spend online).

• We'll hold details of your visits to our Website (including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise) and the websites and other products and services you access through it.

• We may hold information on which devices have accessed your network (e.g. type of device, brand, model, operating system and browser) in order to monitor and better understand how our services are used.

• We may collect information about your computer, including your IP address, and URLs you have accessed.

• We may ask you questions, from time to time, about how you use the services we provide, other services you'd like us to provide in the future and about other things, such as information about your lifestyle.

Most of the personal data is obtained directly from you. In addition, when you order services from us, we may collect personal data from other sources such as credit reference agencies and fraud prevention schemes for credit reference purposes.

### **Business customers**

If you purchase products or services from us as a business customer, either via (i) our Website; (ii) calling our customer service agents; or (iii) submitting a paper order form to us, we may collect and process personal data about you, as the representative of the business, such as your:

- name; and
- contact details.

• If you (or someone using your G.Network broadband or telephone service) use G.Network's network to make a telephone call or connect to the internet, we keep a record of that call (including the number called) so we can charge for it. We also receive information from other operators about calls made over our network, where we need that information for connecting and billing purposes.

• If you abuse or damage the G.Network telephone network, for example by making offensive or nuisance calls, we may keep information relating to that abuse.

• If you abuse our internet service or any other services we provide, for example by not following any part of our **Fair Usage Policy**, we may keep any information relating to that abuse.

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Most of the personal data is obtained directly from you. In addition, when you order services from us, we may collect personal data from other sources such as credit reference agencies and fraud prevention schemes for credit reference purposes.

## **USES MADE OF YOUR PERSONAL DATA**

We use personal data held about you in the following ways:

- To ensure that content from our Website is presented in the most effective manner for you and for your computer.
- For our internal network monitoring, allowing us to deliver optimal network performance to our customers and aid in troubleshooting any problems you may face.
- To market our products or services.
- To process your order.

- To carry out our obligations or use our rights from any contracts entered into between you and us (including, but limited to, maintaining your account, billing, getting credit references, providing you with service and billing information and updates and responding to questions you've sent us).
- To allow you to use the interactive features of our service, when you choose to do so.
- To get your views, improve our services and provide you with information that makes our services more useful to you.
- To tell you about changes to our services.

## **THE LEGAL BASIS FOR USING YOUR PERSONAL DATA**

We will only collect, use and share your personal data where we are satisfied that we have an appropriate legal basis to do this. This may be because:

- It is in our legitimate interest to promote our products and services to you, and you have not selected a direct marketing opt-out box when this is offered; or
- Our use of your personal data is necessary to perform a contract entered into between you and us. This includes, for example, maintaining your account, and providing you with service and billing information.

If you would like to find out more about the legal basis for which we process your personal data please contact us.

## **HOW WE SHARE PERSONAL DATA WITHIN G.NETWORK AND WITH THIRD PARTIES**

We may share your personal data with third parties who help to manage our business and deliver services. These third parties have agreed to confidentiality restrictions and use any personal data we share with them or which they collect on our behalf solely for the purpose of providing the contracted service to us. These include payment providers and marketers.

The personal data that we collect from you may be transferred to, and stored at, third parties based outside the European Economic Area ("EEA"), where necessary to provide our services or manage our business systems and Website. Where we do this, we obtain contractual commitments from such third parties to protect your personal data. Some of these assurances are well-recognised certification schemes like the EU - US Privacy Shield for the protection of personal data transferred from within the EEA to the United States. We may also enter into the Standard Contractual Clauses with the relevant third party. The Standard Contractual Clauses have been approved by the European Commission for transfers of personal data to third countries. You have a right to [contact us](#) for more information about the safeguards we have put in place (including a copy of relevant contractual commitments) to ensure the adequate protection of your personal information when it is transferred outside the EEA.

We may share in aggregate, statistical form, non-personal information regarding the visitors to our Website, traffic patterns, and Website usage with advertisers.

## **HOW WE PROTECT YOUR PERSONAL DATA**

We'll take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we've given you (or you've chosen) a customer ID, password(s) or log-ins to allow you to access certain parts of our Website, you're responsible for keeping these confidential. We ask you not to share them with anyone. You're responsible for how our services are used from your account and for keeping your account information secret. Please keep this information safe, and don't share it with others.

Unfortunately, sending information using the internet isn't completely secure. Although we'll do our best to protect your personal data, we can't guarantee the security of the data you send to our Website; you take the risk for this. Once we've received your information, we'll try our best to keep it secure. This includes using strict procedures and security features to try to prevent unauthorised access.

## **HOW LONG WE STORE YOUR PERSONAL DATA FOR**

We will store your personal data for as long as is reasonably necessary for the purposes for which it was collected, as explained in this Privacy Notice. In some circumstances, we may store your personal data for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax or accounting requirements.

In specific circumstances we may store your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings.

## **DIRECT MARKETING**

We might wish to process your personal data for marketing reasons (or pass it onto others to do the same). We'll usually let you know (before collecting your data) if this is what we plan to use it for.

**You can tell us not to do this (i) by ticking certain boxes on the forms we use to collect your personal data or (ii) at any time by contacting us at support@g.network or writing to us at the address set out under "About", above.**

You can also change the way your browser manages cookies, which may be used to deliver online advertising, by following the steps as explained further below.

## **YOUR RIGHTS**

Subject to certain exemptions, and in some cases dependent on the processing activity we are undertaking, you have certain rights in relation to your personal data, as outlined below.

You can exercise your rights by contacting us. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if with require further information in order to fulfill your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with your request in a different way. Please note that we'll need to confirm your identity before giving you details of any personal data we may hold about you.

### **Right to access personal data**

The GDPR gives you the right to request that we provide you with a copy of the personal data that we hold about you and the right to be informed of: (a) the source of your personal data; (b) the purposes, legal basis and methods of the processing; (c) related rights available to you; (d) the data controller's identity; and (e) the entities or categories of entities to whom your personal data may be transferred.

### **Right to rectify or erase personal data**

You have a right to request that we rectify inaccurate personal data. We may seek to verify the accuracy of the personal data before rectifying it.

You may also request that we erase your personal data in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see right to object); or
- it has been processed unlawfully; or
- to comply with a legal obligation to which we are subject.

We are not required to comply with your request to erase personal data if the processing of your personal data is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

### **Right to restrict the processing of your personal data**

You may ask us to restrict the processing of your personal data, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal data following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

### **Right to transfer your personal data**

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

#### **Right to object to the processing of your personal data**

**You can object to any processing of your personal data which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.**

**If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.**

#### **Right to obtain a copy of personal data safeguards used for transfers outside your jurisdiction**

You can ask to obtain a copy of, or reference to, the safeguards under which your personal data is transferred outside of the European Economic Area.

We may redact data transfer agreements to protect commercial terms.

#### **Right to lodge a complaint with your local supervisory authority**

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal data.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

## **COOKIES**

We may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that's transferred to your computer's hard drive.

If you register with us or continue to use our Website, you agree to us using cookies. Cookies are widely used to make websites work (our Website won't work without some of the cookies we use), or work more efficiently. They also provide useful information to website owners. A cookie is a small text file that's passed to your computer's hard disk through your web browser, so the website remembers who you are when you return.

We use the following cookies in our Website to give you a more personalised web service.

The first type is known as a "session-based" cookie and is allocated to your computer only for the duration of your visit to our Website. It helps you to move around the Website faster. This cookie automatically expires when you close down your browser.

The second type is a "persistent" cookie. These cookies store information between visits. For example, if you select the 'Remember me on this computer' box, your username and password are

saved in a cookie on your computer. This means that the next time you log on to our Website using that computer you won't need to re-enter those details. We suggest you don't select the 'Remember me' box if you use a shared computer (for example, if you access the internet at a cafe, or at a shared or publicly available computer). The cookie file itself won't store your personal information.

G.Network uses Google Analytics to track use of our Website. This helps us see how our Website is used by those who visit it. Google Analytics uses cookies to gather information about our visitors, such as which website you came from and which website you move on to afterwards. Google will use this information to evaluate your use of our Website, compile reports on this and provide other services relating to website activity. Information collected in this way is anonymous and individuals can't be traced. This information allows us to improve our Website and our services, for example, to measure the effect or success of our advertising campaigns and products.

The information generated by the Google Analytics cookie about your use of our Website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google may also transfer this information to others, where they're required to do this by law, or where these others process the information on Google's behalf. Google undertakes not to associate your IP address with any other data held by Google.

For more information about Google Analytics, please see their privacy policy at: [www.google.com/policies/privacy](http://www.google.com/policies/privacy).

G.Network may also use Google AdSense to place adverts about G.Network products on other websites and manage referrals from those websites to our Website. If you arrived at our Website via one of those other websites, AdSense uses cookies to gather statistics about this.

Except for essential cookies, all cookies will expire after 12 months.

You can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. If you want to stop cookies being stored on your computer in future, you should check your browser manufacturer's instructions by clicking "Help" in your browser menu. However, if you block all cookies (including essential cookies) you may not be able to access all or certain parts of our Website. Unless you've set your browser to refuse cookies, our system will issue cookies as soon you visit our Website.

If you want to delete any cookies that are already on your computer, you should check the instructions for your file management software to locate the file or directory that stores cookies.

You can learn about and opt out of a number of commercial third-party cookies (including some used by G.Network) at [optout.networkadvertising.org](http://optout.networkadvertising.org). Some of the opt-outs used by our commercial service providers require a cookie to be placed on your computer. This "opt-out" cookie is only used to tell the relevant cookie servers not to send you any more cookies. If you keep deleting cookies (including "opt-out" cookies) from your temporary internet files, you might need to repeat the opt-out process, the next time you visit our Website.

For more information about deleting and controlling cookies visit [www.youronlinechoices.com](http://www.youronlinechoices.com) or [www.aboutcookies.org](http://www.aboutcookies.org).

## **CHANGES TO THIS PRIVACY NOTICE**



Any changes we may make to this Privacy Notice in the future will be posted on this page. You should check this page from time to time for any changes we made. We may also email you about these changes, if you're a customer of G.Network. Sometimes a notice or other provision on another part our Website might replace part of this Privacy Notice.

## **CONTACT**

If you have any questions, concerns or complaints regarding our compliance with this Privacy Notice and applicable data protection laws, or if you wish to exercise your rights, we encourage you to first contact our Data Protection Officer, Shawn Nolan, at [support@g.network](mailto:support@g.network) or by post at the following address:

58 Grosvenor Street

Mayfair

London

W1K 3JB

## **DATE**

This Privacy Policy is effective from 13<sup>th</sup> December 2018.