



Privacy Policy for The Phone Co-op part of The Midcounties Co-operative

Who We Are

The Phone Co-op is part of The Midcounties Co-operative, a co-operative society which provides telecommunication services to our members and customers. We are dedicated to safeguarding and preserving your privacy. This Privacy Policy provides an explanation as to what happens to any personal data that you provide to us, or that we collect from you. As a data controller we comply with our obligations under the General Data Protection Regulations by keeping personal data up to date, be it: storing and destroying it securely; not collecting or retaining excessive amounts of data; protecting personal data from loss, misuse, unauthorised access and disclosure, and ensuring that appropriate technical measures are in place to protect personal data.

Information We Collect

When you place an order with us for any of our services we will need certain information to process your order. This may be information such as your name, private/business email or postal address, telephone or mobile number, and date of birth which will help us identify you. We also collect financial or credit card information in order to bill you for our services. We gather this information so that we can provide you with the service, charge you for it and let you know if we make changes to it. We also use your personal information to check your identity if you get in touch with us.

When you first order any services from us, or buy certain new services, we run a credit check on you. To do that we give some of your personal information to credit reference agencies.

We and our suppliers keep information about how you're using your broadband to help us understand and manage traffic flows on our network, and improve our services. That includes IP addresses and other traffic data including websites you've visited. We are sometimes contacted by third parties who monitor illegal online file sharing on behalf of copyright holders. If we receive a claim that there has been illegal sharing on your broadband service, we may use your IP address to notify you. But unless we are required to by law, we will not disclose your personal information to the copyright holder or any party acting on their behalf.

When you use your mobile, we record certain things about that use. They include the amount you spend, the numbers you call or text (but not the content of the text), the numbers that call or text you, and the location of the cell that you make a call from. We also record the time and the length of all incoming and outgoing services like calls, texts and picture messages (MMS) and data use while you're in the UK and abroad.

When you contact us to discuss your services, we ask for information to be able to confirm your identity, check our records and answer your questions quickly and accurately.

When you visit our website we may collect data about you. This includes details of your visits to our website and the resources that you access as well as information that you provide by filling in forms on our website, such as when you register for information, make a purchase,

use our service checker or complete a contact form. This information includes, but is not limited to, your name and address, telephone, fax, email details, direct debit information and date of birth. We may gather information about your visit for our services. Such information will not identify you personally; it is statistical data about our visitors and their use of our site. This statistical data does not identify any personal details whatsoever.

Trusted third parties –acting in compliance with the Payment Card Industry Data Security Standard –collect and use your payment card details.

We may gather information about your general Internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer and is sent to us when you access our services. They help us to improve our website and the service that we provide to you. You can decline the use of cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website.

How We Use Your Information

The information that we collect and store is used to enable us to provide our services to you and meet our contractual commitments. It is the legal reason we process your personal data. In addition, we may use the information for the following purposes:

- To provide you with information requested from us, relating to our products or services.
- To provide information on other products which we feel may be of interest to you, where you have consented to receive such information.
- To notify you about any changes to our services such as improvements or scheduled maintenance that may affect our services
- To confirm your identity when you contact us

If you do not want us to use your data in this way, you can withhold your consent to this when you provide your details to us and at any time in the future by logging in to the 'Your Account' section of our website at www.thephone.coop. We will continue to contact you if we have a legitimate reason to do so with regard to the provision of services to you. You can opt out of receiving marketing messages.

Sharing Your Information

The information we hold about you is confidential. However, where applicable, we may disclose your personal information to our Affinity partners or Agents who introduced you to our services in order to provide them with commission details.

We sometimes use third parties to provide services to you or to provide services to us. Therefore, we may need to share your personal information with them. These third parties are required to act in accordance with the instructions we give them and they must meet the requirements of the General Data Protection Regulations or "GDPR" to keep the information secure. We may also disclose your personal information to third parties:

- Where we transfer any or all of our business and/or our assets to a third party.
- Where we are legally required to disclose your information.
- To assist fraud protection and minimise credit risk.

Storing Your Information

Data that is provided to us is stored on our secure servers.

The Phone Co-op will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to

keep your information accurate and up to date, and not keep it for longer than is necessary. We are required to retain information in accordance with the law, such as information needed for tax and audit purposes. In some cases, there are legal requirements to keep data for a minimum period. Unless there is a specific legal requirement for us to keep the 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.

We may monitor and record our communications with you, including e-mails and phone conversations. Information which we collect 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.

Data may be processed by staff operating outside the European Economic Area who work for us or for one of our suppliers. For example, such staff may be engaged in the processing and concluding of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We take steps to ensure that if information is transferred outside of the EEA by our service providers and hosting providers, appropriate measures and controls are in place to protect that information in accordance with applicable data protection laws and regulations. Transfers are made in accordance with the requirements of Regulations (EU) 2016/679 (the General Data Protection Regulations or "GDPR") and may be based on the use of the European Commission's Standard Model Clauses for transfers of personal data outside the EEA.

We will take all reasonable steps to make sure that your data is treated securely and in agreement with this Privacy Policy. To the extent that personal data is processed about you, we will employ appropriate security measures given the nature of that data. However, you recognise that your use of the Internet and our website is entirely at your own risk. We have tried to create a secure and reliable website for our users. However, we have no responsibility or liability for the security of personal information transmitted via the Internet. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

Third Party Links

You might find links to third party websites on our website. These websites should have their own privacy policies which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

Access To Your Information

While we are in possession of or processing your personal data, you have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

- Right to judicial review- in the event that we refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below

Should you wish to receive details that we hold about you please fill out the Subject Access Request form which can be downloaded from our website **HERE**. In order to deal with your enquiry as quickly as possible, please include the following information:

- The relevant account number/s
- The relevant telephone number/s
- The relevant address/es
- The date and time if requesting a call recording (note: we record some calls, however, not all calls are recorded and calls are only held for a short period of time)

If you have any information such as reference numbers, dates and times of contact then please include them in your request.

In order to process your request, we will need to confirm your identity. We will need two forms of identification, which can be:

- Passport
- Driving licence
- Birth certificate
- Utility bill (from last 3 months)
- Current vehicle registration document
- Bank statement (from last 3 months)
- Rent book (from last 3 months)

Once we have all the relevant information we will process your request within one month.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed, you have the right to lodge a complaint directly with the supervisory authority and The Data Protection Officer. The supervisory authority in the United Kingdom is the Information Commissioner's Office. Contact details can be found at <https://ico.org.uk/>

Changing your details

If you believe any of the details we hold about you are incorrect or out of date, please contact us to have them amended.

Contacting Us

We welcome any queries, comments or requests you may have regarding this Privacy Policy.

Please do not hesitate to contact us at:

Data Protection Officer

The Phone Co-op part of The Midcounties Co-operative

Co-operative House,

Secretariat Group,

Warwick Technology Park,

Warwick

CV34 6DA

email: data-protection@midcounties.coop

telephone: 01926516007