Cellular Solutions and Services Limited and Cellular Solutions and Network Services' Privacy Policy

This privacy policy sets out how Cellular Solutions and Services Limited and Cellular Solutions and Network Services uses and protects any information that you give Cellular Solutions when you use this website.

Cellular Solutions is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

Cellular Solutions may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 16th May 2018.

Definitions and interpretation

Account data	This refers to data regarding the mobile usage on your business account – including business mobile/ landline numbers, phone usage including most frequent dialed numbers, and billing spend.
Data/ personal data	Collectively all information that you submit to Cellular Solutions via our Website. This definition incorporates definitions provided in the General Data Protection Regulation (GDPR).
Cellular Solutions, "we", "us" or "our"	Cellular Solutions and Services Limited, registered number 03837718, and Cellular Solutions and Network Services Limited, registered number 08445652 whose registered offices are at Chariot House Ltd, 44 Grand Parade, Brighton, England, BN2 9QA.
European Economic Area (EEA)	The area in which the Agreement on the EEA provides for the free movement of persons, goods, services and capital within the European Single Market.
Profile data	This refers to data used to create a profile through our website, including account number and business postcode.

Independent Commissioner's Office (ICO)	The UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.
The General Data Protection Regulation (GDPR)	Effective from 25 May, 2018, the GDPR is a legal framework that sets guidelines for the collection and processing of personal information of individuals within the European Economic Area (EEA).
Third Party or Third Parties	Another company/ agency/ body which is not the user or Cellular Solutions and Services Limited or Cellular Solutions and Network Services Limited. This company/ agency/ body is under the direct authority of Cellular Solutions and Services Limited or Cellular Solutions and Network Services Limited who are authorised to process personal data.
Usage data	This refers to data about your use of our website and services. This includes your IP address, browser type and version, length of visit, page views and website navigation path, as well as information about the timing, frequency and pattern of your service use.
"User" or "you"	The individual accessing utilising our website.
Website	The website that you are currently using – www.cellularsol.co.uk, and any subdomains of this site.

Contact and communication with us

Users contacting this us through this website do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use, or until you withdraw your consent for us to hold your information.

Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details to send you products/services information through a mailing list system. This is done in accordance with the GDPR.

What personal data do we collect and process?

We may process 'enquiry data' information contained in any enquiry you submit to us regarding goods or services. The source of this data is you. This data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is consent. As such, you can at any time opt-out from receiving such communication.

We may also process your 'usage data' i.e. data about your use of our website and services. This usage data may include your IP address, browser type and version, length of visit, page views and website navigation path, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is legitimate interests, namely monitoring and improving our website and services.

The 'account profile data' including account number, business postcode, and business email may be processed for the purposes of enabling and monitoring your use of our website and services. The legal bases for collecting this data are our legitimate interests, namely the proper administration of our website and business, as well as for the performance of a contract between you and us and/or taking steps, at you request, to enter into such a contract.

We may also process your 'account data' including your business mobile numbers, mobile usage including most frequent dialled numbers, and billing spend. The source of this data is you and the other users on the business account. The 'account data' may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal bases for this processing is for the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Please do not supply any other person's personal data to us.

Sharing your personal data with others

As part of services that Cellular Solutions offers you, your personal data may be transferred to and stored in countries outside of European Economic Area (EEA) as we use an email marketing service to design and send our marketing emails (e.g. our newsletters), which is based outside of the EEA, and which uses services based outside of the EEA.

If we transfer or store your personal data outside the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected, as outlined in this privacy policy and in accordance with the GDPR.

We may disclose your personal data to any member of Cellular Solutions and any member of our group of companies insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.

We may share your website usage data with our external website management company and search engine optimisation (SEO) advisors in order to enhance and improve our website user experience. Our legal basis for this sharing is legitimate interests as set in this policy.

We may disclose your personal data to professional advisers insofar as reasonably necessary for the purposes of obtaining professional advice, or for the establishment, exercise or defence of legal claims.

Additionally, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

How long will we retain your information?

The periods for which we keep your information will depend on the purpose for which the information was collected. We will not keep personal information for longer than is necessary for our business or legal requirements.

Enquiry data obtained will be expunged from our systems if consent is withdrawn/ if the user opts out from our marketing communications.

'Account profile data', 'account data' and 'usage data' for customers no longer receiving Services from Cellular Solutions are stored and secured for 7 years and then deleted or securely destroyed. We keep this information so that we can confirm that the relationship existed – and that it has ended – as well as some of its details should any previous customers either require them for future queries or complaints.

Your rights

We have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under the GDPR are:

1. The right to access

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.

2. The right to rectification

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

3. The right to erasure

In some circumstances you have the right to the erasure of your personal data without undue delay. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary for example, for compliance with other legal obligations which supersede your data protection rights.

4. The right to restrict processing

You have the right to restrict the processing of your personal data under certain circumstances, for example, if you are contesting the accuracy of your personal data. Where processing has been restricted on this basis, we may continue to store your personal data.

5. The right to object to processing

You have the right to object to our processing of your personal data on grounds relating to your particular situation. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

- You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.
- 6. The right to data portability
 - o To the extent that the legal basis for our processing of your personal data is:
 - consent; or
 - that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,
 - and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machinereadable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 7. The right to complain to a supervisory authority
 - If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with the Independent Commissioner's Office (ICO).
- 8. The right to withdraw consent
 - o If the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time.

You may exercise any of your rights in relation to your personal data by emailing customersupport@cellularsol.co.uk.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Downloads and media files

Any downloadable documents, files or media made available on this website are provided to users at their own risk. While all precautions have been undertaken to ensure only genuine downloads are available, users are advised to verify their authenticity using third party anti-virus software or similar applications.

We accept no responsibility for third party downloads and downloads provided by external thirdparty websites and advise users to verify their authenticity using third party anti-virus software or similar applications.

Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you

provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Email mailing list and marketing messages

We operate an email mailing list program, used to inform customers about products, services and/or news we supply/publish. Customer personal details are collected, processed, managed and stored in accordance with the GDPR. Customers can unsubscribe at any time – via a link in in the footer of sent marketing messages.

Email marketing messages may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of customer 'usage data' relating to engagement, geographic, demographics and already stored customer 'usage data'.

Any questions?

If you have any queries regarding our privacy policy, please contact customersupport@cellularsol.co.uk.