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Cellular Solutions Network Services Limited's Customer Data Protection Policy



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CELLULAR SOLUTIONS NETWORK SERVICES LIMITED

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KEY DETAILS

- Policy prepared by: Alex Hughes
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GLOSSARY

CSNS, “we”, “us” or “our”	Cellular Solutions Network Services Limited, registered number 08445652, whose registered offices are at Chariot House Ltd, 44 Grand Parade, Brighton, England, BN2 9QA.
Consent	Freely given, specific, informed and explicit consent by statement or action signifying agreement to the processing of their personal data.
Data Subject	An individual who is the subject of personal data. In other words, the data subject is the individual whom particular personal data is about.
Data Controller	A person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data is, or are, to be processed.
Personal data breach	A breach of security leading to the accidental or unlawful access to, destruction, misuse etc. of personal data
Information Commissioner’s Office	A UK independent public body which reports directly to Parliament. It was established to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.
Personal Data	Any information which relates to a living individual who can be identified from that data.
Processing	Any operation performed on personal data including collection, use, recording etc.
Subject access request	A written request from an individual to see data held on them.

Third Party or Third Parties

Another company/ agency/ body which is not the user or Cellular Solutions Network Services Limited. This company/ agency/ body is under the direct authority of Cellular Solutions Network Services Limited who are authorised to process personal data.

INTRODUCTION

The privacy of all CSNS' customers is important to us. Whenever CSNS needs to obtain information about our customers, all necessary steps are taken to ensure that data is used only for the purposes clearly stated. This policy document is designed to assist you in understanding how CSNS uses and safeguards the information you provide to us. This policy details what personal information CSNS' stores, how we use it, why we need it, what your rights are and how you can exercise them, and how you can check and update any of your personal information. This policy is written in accordance with the General Data Protection Regulations (GDPR) 2018.

WHAT DATA DO WE STORE?

To provide you with our exceptional service we need to have certain information about you. Personal data are facts we collect about you when you sign up to and use our services. Information CSNS stores on our customers are:

- Personal details:
 - Name and company
 - Company address
 - Payment method and company payment details
 - Work telephone/mobile number
 - Work email address
- How you use our networks' products and services. (To effectively carry out regular services on your account, CSNS processes the following information from our networks):
 - Usage and billing records
 - Details about usage of other products CSNS has sold to you, including digital products. This includes the date and time you use them, how long for, and how much it costs.
 - CSNS cannot look at the content of your messages or listen to your calls.
- Sensitive data is defined as:
 - racial or ethnic origin of the data subject;
 - political opinions;
 - religious beliefs or other beliefs of a similar nature;
 - whether or not they are member of a trade union;
 - physical or mental health or condition;
 - sexual life;
 - the commission or alleged commission of any offence; or

- any proceedings for any offence committed or alleged to have been committed by the data subject, the disposal of such proceedings or the sentence of any court in such proceedings.
- Please be aware that CSNS does not obtain or process any sensitive data.

WHY DOES CSNS NEED TO COLLECT YOUR PERSONAL INFORMATION?

CSNS needs to collect information about yourself and your company account. The legal bases for collecting this data are our legitimate interests, namely:

- The proper administration and management of your business fixed line account
- To suggest and deliver products and services relevant to you
- To improve our service to our customers

As well as for the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

CSNS also collects information so we can inform you about our (and your network's) products and services. Additionally, UK law also requires us to keep certain information about our customers.

FOR HOW LONG DOES CSNS RETAIN YOUR DATA?

There are strict laws and guidelines in the UK which determine for how long we may hold personal data about you. These include guidelines on data protection, privacy and anti-terrorism legislation. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Upon termination of your contract with us your business account information, contact information and records are stored securely 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.

HOW DO WE EXPUNGE YOUR DATA?

After holding your information for the required amount of time (dependent on the type of data it is) we will then remove or destroy it.

- Physical records will be shredded on-site and then securely sealed in a confidential waste bag and collected by our paper recycling partner.
- Electronic records will be deleted from our CRM systems, hard-drives and servers, which then sync and wipe data from all CSNS electronic devices.

HOW DO WE ENSURE THE SECURITY OF YOUR DATA?

CSNS takes the security of your data seriously and as such ensures appropriate levels of security for your data. We take into account the costs of implementation and the nature, scope, context and purposes of processing, as well as implementing risk assessment when handling your data. We utilise passwords, pseudonymisation, anonymisation and email encryption where necessary. All of our internal systems are securely password protected and users are automatically logged out after a specific time period of inactivity. Our servers are firewall protected and we utilise anti-virus, anti-phishing and anti-malware protection.

WHAT DATA DO WE SHARE AND WHY?

We need this information so that we can confirm your identity and process your order when you first sign up for our Service. We may also use your personal data for:

- Regulatory compliance
 - We may need to share your personal data with a public authority or law enforcement agency if requested. We may also share your data to comply with UK law/regulations, or for possible legal proceedings.
 - We may need to share your information if you give us personal information that is wrong or it is discovered that you're responsible for fraud. In these circumstances we might share your information with third parties such as law enforcement agencies, credit reference agencies and other affected third parties.
- Credit referencing
 - We may use your personal data for purposes of undertaking credit reference searches and analysing credit worthiness during the term of your Contract.
- Third parties
 - We may share your data with third parties to process your data.
 - We may also share your data with third parties such as insurance providers whose products and services we market to you (where you have given permission to receive such messages).
 - We may also share your data with third parties to carry out data analysis.
 - We ensure that any third parties with whom we share data conform to the same or similar guidelines as CSNS, and adhere to the GDPR.

The legal bases for sharing this data are our legitimate interests, namely:

- The proper administration and management of your business fixed line account
- To suggest and deliver products and services relevant to you
- To improve our service to our customers

As well as for the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

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.

YOUR RIGHTS

You have a number of legal rights in relation to the information that we hold about you, including:

- The right to request details of the information we have about you.
- The right to withdraw your consent to the use of your information where we are relying on that consent (for example, you can opt-out of receiving marketing messages from us). Please note that we may still be entitled to process your information if we have another legitimate reason (other than consent) for processing.
- In some circumstances, you have the right to receive some of your information in a usable format and/or request we transmit that data to a third party where this is technically feasible. Please note that this right only applies to information which you have provided to us.
- The right to ask that we update your information if it is inaccurate or incomplete.
- The right to ask that we erase your information in certain circumstances. Please note that there may be circumstances where you ask us to erase your information but we are legally entitled to retain it.
- The right to request that we restrict the processing of your information in certain circumstances. There may, however, be circumstances where you ask us to restrict the processing of your information, but we are legally entitled to refuse that request.
- The right to make a complaint with the Information Commissioner www.ico.org.uk if you think that any of your rights have been infringed by us.

To exercise any of the rights listed above, please ensure that requests are emailed to fixedline@cellularsol.co.uk.

PERSONAL DATA BREACH

CSNS shall notify all relevant customers without undue delay upon CSNS, or any of its third parties, becoming aware of a personal data breach affecting your business' personal data. We will provide our customer contact with sufficient information to allow their business to meet any obligations to report or inform data subjects of the personal data breach under the GDPR.

We shall co-operate with you and take such reasonable commercial steps as directed by you to assist in the investigation, mitigation and remediation of each such personal data breach.

MARKETING COMMUNICATIONS

All our existing customers will occasionally be contacted via email or phone. We only send marketing on extra services and products related to your existing account. We will continue to do this unless you choose to unsubscribe from our customer newsletter and mailing list. We do not spam email non-customers.

CONTACT US

If you would like more information on how we use your information or to raise any queries with us in relation to your information, please contact fixedline@cellularsol.co.uk.