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## **Foreword**

Boundless Networks Limited (the 'Company') provides infrastructure and data communication services to domestic, business and wholesale clients in a secure and resilient manner, and recognises that data and network security is an integral part of our business performance.

# Privacy Policy

**The Company** operates in the telecommunications sector.

**The Company** is committed to respecting and protecting your privacy, to handling the information that we collect from you in a secure and responsible manner and to compliance with to the guidelines published in the United Kingdom Data Protection Act and the General Data Protection Regulation (EU) 2016/679 which are applicable from the 25th May 2018.

Any questions relating to this policy should be sent to [datacontroller@boundlessnetworks.co.uk](mailto:datacontroller@boundlessnetworks.co.uk)

Please read this privacy policy, which explains how we use your personal information, in particular:

- What information is collected from you through our trading website(s) including social media
- How the information is used
- With whom the information may be shared
- How you can correct any inaccuracies in the information

## General

Once you choose to provide us with personally identifiable information (any information by which you can be identified), you can be assured that it will only be used to support your customer relationship with **The Company**.

When you register with **The Company** website you may be asked for the following details:

- Name
- Address (both service delivery and billing)
- E-mail address
- Contact telephone number (s)
- Longitude and Latitude coordinates for the service delivery address

We will store your details safely and will not sell or share your details to third parties without your consent.

We will only share your information in the way described in this statement.

## Use of your data

**The Company** may pass your data to our service partners, contractors, if you request details about:

- Voice over Internet Protocol (VoIP)
- Fibre to the premise orders
- Other copper line services
- LTE broadband services
- Satellite broadband services

**The Company** may pass your data to the following third parties, especially if there is a legal or statutory requirement:

- Data requests received under The Regulation of Investigatory Powers Act 2000, known as RIPA.
- Data requests for cases of legal infringement, for example, piracy, copyright infringement.
- Government agencies providing grants and or subsidies for your installation.
- Employers paying for your service.

If you nominate a third party, such as an IT support company, or another family member to engage **The Company** to discuss your account and service then we must have this request in writing clearly stating what personal data and service information we can share with them. We respectfully will decline any and all approaches from anyone other than the account holder without this authority. Authority requests and changes to authorised third party of family members should be made in writing to the [datacontroller@boundlessnetworks.co.uk](mailto:datacontroller@boundlessnetworks.co.uk).

**The Company** may use your personal details to contact you about news and special offers that we think may be of interest to you as part of the contractual and consent process.

If you wish to subsequently amend your consent, please e-mail the Data Manager at [datacontroller@boundlessnetworks.co.uk](mailto:datacontroller@boundlessnetworks.co.uk).

Please also use these contact details to let us know if you would like us to delete any information from your records and we will do so at any time.

## Personal information: collection and retention

We will only collect sufficient information about you to allow us to communicate with you in an appropriate way. This information will include your name and contact details as appropriate.

**The Company** uses your information to better understand your needs and provide you with better service. Specifically, we use your information to communicate back to you, to update you on products, service and benefits. We will always give you the opportunity to unsubscribe.

**The Company** will not sell, rent, or lease your personally identifiable information to others, unless we are required by law. We will also provide you the opportunity to let us know if you do not wish to receive unsolicited communications from us and we will honour such requests.

The use of our website will result in the organisation receiving information from you. This will be used in examples such as viewing services or making online requests for services.

The organisation requires this information to provide our online services to book appointments or engineer visits to your service delivery address.

To make an online booking for sales or raising a ticket due to a service delivery issue we require the following;

- a. Customer Name
- b. Customer Business Name (where applicable)
- c. Customer contact details, such as email address, mobile and landline telephone numbers
- d. Customer billing and service address details including LAT/LONGs of service address.

As part of our duty of care we will contact you with reference to necessary engineer visits, network maintenance and telephone based technical support.

**The Company** may use your personal information for general marketing purposes as part of the contractual or consent process.

If you subsequently wish to amend your consent on general marketing, service and reminders then please request that by sending an email to [datacontroller@boundlessnetworks.co.uk](mailto:datacontroller@boundlessnetworks.co.uk) or a written request to: The Data Controller, Boundless Networks, Hangar 1, Southside Aviation Centre, Yeadon, Leeds, LS19 7UG.

Please be aware that if you call **The Company** your calls may be monitored or recorded for training purposes.

If you visit our offices we use CCTV to monitor our premises in this event your image and your vehicle registration can potentially be stored for a period of weeks.

Our data retention periods are reviewed on a regular basis and we will only hold your personal information as long as it deemed relevant for the required service/activity or as required for legal reasons or as stated in any relevant contract that we have in place with you.

## Marketing

**The Company** will contact you with reference to our duty of care for services delivered OR where there is a contractual requirement for us to do so.

If you have agreed to receive marketing from **The Company** by form of consent you will have the option to select which form of marketing you would like to receive. You may choose to amend your consent to receive such marketing from us and you can do this by sending an email to [datacontroller@boundlessnetworks.co.uk](mailto:datacontroller@boundlessnetworks.co.uk) or by written request to The Data Controller, Boundless Networks Ltd, Hangar 1, Southside aviation Centre, Yeadon, Leeds, LS19 7UG. We encourage you to use these methods to unsubscribe from our marketing services.

If you have agreed to receive marketing from **The Company** we may inform you of new products available from companies within our organisation or third-party partners.

## Tracking

We track your movements on the website to analyse trends and public interest in our products and services to administer the site and gather information for aggregate use. The information we gather in this way is anonymous and is not linked to personal information from which you can be identified.

## Sharing

We share information within **The Company** to offer you the full range of our services, but your personal data is not disclosed to any third parties outside **The Company** without your consent. If you consent to a credit search with respect to a finance application then we will be required to submit your information outside of the company. This information will not be used for any other purpose other than to obtain a credit limit, which we will communicate, to you.

## Safety and compliance

For warranty and product safety requirements, you may be contacted by **The Company**. An example would be a manufacture recall of a batch of routers.

## Data security

You should be aware that the transmission of information via the internet is not completely secure though we will endeavour to protect your personal data. However, **The Company** cannot guarantee the security of your data in transit.

After receiving your information, **The Company** will use clear procedures and security measures to try to prevent unauthorised access.

**The Company** will never ask you to email your bank details, usernames, passwords, or ask you through an email or text for personal banking information.

If you suspect you have become a victim of fraud please report this instance to the police through 'Action Fraud' via the website [www.actionfraudpolice.co.uk](http://www.actionfraudpolice.co.uk) or by calling 03001 232040. **The Company** would also recommend contacting the Information and Commissioners Office (ICO) via the website [www.ico.gov.uk](http://www.ico.gov.uk).

## Access to information

You may request a copy of your personal information that **The Company** holds about you at no cost. If you wish to access or update your personal information please contact **The Company** by sending an email to [datacontroller@boundlessnetworks.co.uk](mailto:datacontroller@boundlessnetworks.co.uk) or a written request to: The Data Controller, **The Company**, Hangar 1, Southside Aviation Centre, Yeadon, Leeds, LS19 7UG.

If you want us to delete any of the personal information the company holds please request this via email or writing to the above address. However, if your personal information relates to any legal investigation then it may be not be removed.

If there are any concerns that **The Company** are not using your information in accordance with our processes, and with legal precedence, or you are not satisfied with our response to your data request that are made you can refer to the Information Commissioners Office (ICO) - [www.ico.gov.uk](http://www.ico.gov.uk)

## Disclosure of information

**The Company** may disclose your personal information to other members of our organisation as described above.

**The Company** may disclose your personal information to other parties in the event of:

- If we sell any of our businesses we may disclose your personal information to the prospective buyer of the relevant business.
- In the event of a duty of disclosure due to compliance with legal obligation then your personal information may be shared.
- To enforce or to comply with our terms and conditions of use for non-compliance.
- Data may be shared with other organisations for purposes of fraud protection and credit risk reduction.
- In the event of a data cleansing organisation being sourced under contract to ensure accuracy of data information.
- In the use of live chat and phone calls your information may be collected and shared with our third-party providers.

## Cookies

We use cookies to make this website as useful to you as possible.

Cookies are small text files that we put in your browser to track usage of our site to improve and enhance your web browsing experience but they do not tell us who you are. Absolutely no uniquely identifiable information is stored in any of our cookies.

## What are Cookies?

A cookie is a piece of data/text file that is placed in your computer's memory when you visit a website. The information the cookie contains is set by our website's server and, depending on the type of cookie, may be used each time you visit our website.

Cookies are widely used to make our website work, or work more efficiently for you as well as to provide companies with information about traffic through our website.

Cookies are designed to remember things that you have done on a website in the past, which can include putting products in your basket, logging in, or clicking on links. This can save you time when you visit a website more than once.

Cookies may also be used to:

- To remember your preferences.
- To remember your password.
- To find out what the website doesn't do well and make improvements to it in future.
- Allow you to share pages with social networks like Facebook.
- To make personalised product recommendations, based upon your previous times you've visited our website.
- Make sure advertising on other websites is relevant to you.
- They can also help us to see how many people are visiting our website and which pages are the most popular (see Google Analytics).

## Advertising Cookies

Our website uses cookies/advertising IDs for the purpose of advertising. This enables us to show our advertisements to visitors who are interested in our products on partner websites, apps and emails. Re-targeting technologies use your cookies or advertising IDs and display advertisements based on your past browsing behaviour. You can opt-out of interest-based advertising by visiting the [Network Advertising Initiative opt out page](#).

Cookies are not dangerous. They are not computer programs and cannot be used to circulate viruses. They are not used to identify you personally.

## Google analytics

This is a behavioural tracking service that shows us what pages people have visited, for how long and in what order. It also tells us whether people are using desktops or mobile devices to view the website, and other helpful information. This data helps us find out what can be improved on the website and how important it is.

## List of cookies

Here is a list of the main cookies we use, and what we use them for on our website. You can at any time refuse the use of cookies.

### IP Addresses

The additional cookies that run during your session will collate information regarding your computer in the form of server logs including where available your IP addresses, operating system and browser types regarding your systems administration. This is for the purpose of statistical data and disabling cookies ensures that your IP address will not be recorded. You can update your cookie preferences in your browser settings. Please note that disabling cookies will ensure that your IP address will not be recorded. **The Company** would request that the cookies are accepted, as they are used for:

- Customisation of the website layout and content.
- Recognition of when a user has visited and how many unique visits are received.
- Remembering your preferences and settings.
- Recognition of devices so as to not need to provide the same information on visits to the website.
- Identification of errors for resolution.
- Identification of what is relevant whilst browsing the website.
- Collation of statistical and anonymous information around the use of our digital services.
- Effectiveness of our website and online message.

## Links

The Websites associated with **The Company** may contain links to and from the websites of our partner networks. In the event of you following these links, these websites will have their own privacy policies, **The Company** do not accept any responsibility or liability for these policies.

**The Company** would advise that you check these policies before you submit any personal information to these websites.

## Social networks

The Websites associated with **The Company** may offer you opportunity to share or follow information about the business using third party social networking functionality; share, like or follow buttons.

We offer this functionality in order to generate interest toward our website and services among members of your social networks.

You should be aware that sharing personal information within a social network may result in that being collected by the social network provider. This could result in that information becoming publicly available in internet search engine results.

**The Company** do not exercise or endorse controls, policies or practices or any third party social network that you may access through our websites.

Please read the privacy policy of any social network with which you may share information with.

## Log data

Like many site operators, we collect information that your browser sends whenever you visit our site ("Log Data").

This log data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyse this.

## Information collection and use

While using our site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to your name ("Personal Information").

## Security

The security of your personal information is important to us but remember that no method of transmission over the internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.