



4Com Privacy Notice

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or the UK data protection authority (the Information Commissioner's Office or the **ICO**) in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (**UK GDPR**).

This privacy notice covers the following 4Com companies:

- 4Com Group Limited
- Pioneer Business Systems Limited
- HiHi Ltd
- Campfire Equipment Rentals Limited
- 4Com Network Services Limited
- Midshires Business (Communications) Limited
- Eastern Telephones Limited t/a Eastern Voice and Data
- Reach Digital Telecoms Limited
- Southern Business Communications Limited

This privacy notice is in a layered format so you can click through to the specific areas set out below which you would like to know more about. Alternatively, you can download a pdf version of the privacy notice here: [Please insert link].

It is important that you read this privacy notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your personal data. This privacy notice supplements such other privacy notices and is not intended to override them.

Our Websites (as defined below) are not intended for children and we do not knowingly collect data relating to children.

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Key Terms

The following are some key terms used in this privacy notice and an explanation of what those key terms mean:

| | |
|---------------------------------------|--|
| 4Com Group | means 4Com Group Limited (a company registered in England and Wales under company number: 10844874) |
| 4Com Network | means 4Com Network Services Limited (a company registered in England and Wales under company number: 06472696) |
| Campfire | means Campfire Equipment Rentals Limited (a company registered in England and Wales under company number: 12831439) |
| Eastern | means Eastern Telephones Limited t/a Eastern Voice and Data (a company registered in England and Wales under company number: 05207395) |
| Group | means together 4Com Group, Pioneer, 4Com Network, HiHi, Campfire, Midshires, Eastern and Reach |
| Group company | means any company in the Group |
| HiHi | means HiHi Ltd (a company registered in England and Wales under company number: 07590894) |
| Midshires | means Midshire Business Systems (Communications) Limited (a company registered in England and Wales under company number: 04351890) |
| our Websites | means www.4com.co.uk , www.pioneercomms.co.uk , www.ripplecomms.co.uk , www.rubixcommunications.co.uk , www.harveycommunications.co.uk , www.midshiretelecom.co.uk , www.hihi.co.uk , www.easternvoicedata.co.uk , www.reachdigitaltelecoms.co.uk , www.sbcltd.co.uk and mi4com.co.uk |
| personal data | means any information relating to an identified or identifiable individual |
| Pioneer | means Pioneer Business Systems Limited (a company registered in England and Wales under company number: 08380630) |
| Reach | means Reach Digital Telecoms Limited (a company registered in England and Wales under company number: 09375466) |
| special category personal data | means data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, genetic and biometric data (when processed to uniquely identify an individual) and data concerning health, sex life or sexual orientation |

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|--------------------|---|
| SBC | means Southern Business Communications Limited (a company registered in England and Wales under company number: 02529115) |
| we, us, our | means the relevant company in the Group responsible for processing your personal data |

Overview of which Group company processes your personal data

Under data protection law, a data controller determines the purpose and means of the processing of your personal data.

If you are an individual customer or a representative of a customer, you may engage with 4Com Network, Midshires, Eastern or Reach. The relevant 4Com company you engage with will be a data controller of your personal data.

If you are a prospective individual customer or a representative of a prospective customer, you may engage with Pioneer (trading as Harvey Communications, Ripple Communications or Rubix Business Systems), Midshires, Eastern, SBC or Reach. The relevant 4Com company you engage with will be a data controller of your personal data.

If you are a representative of a supplier, you may engage directly with any of the Group companies. The relevant Group company you engage with will be a data controller of your personal data.

For marketing purposes, 4Com Group, Pioneer, 4Com Network, Midshires, Eastern or Reach may be a data controller of your personal data.

For personal data collected via the www.4com.co.uk website (except for personal data collected in relation to the reporting of faults), 4Com Group will be a data controller of your personal data.

For personal data collected via the www.pioneercomms.co.uk, www.ripplecomms.co.uk, www.rubixcommunications.co.uk and www.harveycommunications.co.uk websites, Pioneer will be a data controller of your personal data.

For personal data collected via the www.midshiretelecom.co.uk website, Midshires will be a data controller of your personal data.

For personal data collected via the www.hihi.co.uk website, HiHi will be a data controller of your personal data.

For personal data collected via the www.easternvoicedata.co.uk website, Eastern will be a data controller of your personal data.

For personal data collected via the www.sbcld.co.uk website, SBC will be a data controller of your personal data.

For personal data collected via the www.reachdigitaltelecoms.co.uk website, Reach will be a data controller of your personal data.

If the business you represent requires contract funding and this is obtained through Campfire, then Campfire will be a data controller of your personal data.

For personal data collected via the www.4com.co.uk website in relation to the reporting of faults and from the mi4com.co.uk website, 4Com Network will be a data controller of your personal data.

Please see below: [**What we use your personal data for**] for further information about the purposes for which the Group uses your personal data.

Personal data we collect and use

The type of personal data we collect depends on our relationship with you and the method by which we collect the personal data.

The table below sets out the personal data we may collect about you.

| | |
|---------------------------------|--|
| Identity personal data | Name |
| | Title |
| | Username/similar identifier |
| | Date of birth, if we ask for this or you choose to give this to us |
| | Gender or pronouns, if you choose to give this to us |
| | Marital status, if we ask for this or if you choose to give this to us |
| | Job title |
| | Name of your employer or the organisation you represent |
| | Passport information |
| | Driving licence |
| | Information from utility bills |
| Contact personal data | Work or personal email address |
| | Work/home postal/delivery address |
| | Work telephone number(s) (landline and/or mobile) |
| Contract personal data | Information relating to your contract(s) with us including transaction information |
| Financial personal data | Billing information and payment card information |
| | Information to enable us to undertake credit and other financial checks on you |
| IT Systems personal data | CCTV footage Call recording |
| Marketing personal data | Marketing and communications information, which may include information about your personal interests, your preferences in receiving marketing from us and your communication preferences |
| Technical personal data | Information from when you visit our Websites, including your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Websites |
| Usage personal data | Information about how you use our Websites including the full Uniform Resource Locators (URL) clickstream to, through and from our Websites (including date and time), page response times, download errors, length of visits to certain pages, page interaction information |

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| | (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page |
| Website enquiry personal data | This includes information you provide when you fill in forms on our Websites, subscribe to our services, request further services, make an enquiry on our Websites, request a call back, sign up for newsletters, complete surveys undertaken by us for research purposes and report a problem with our Websites |
| Other personal data | Information we ask for or that you volunteer to us when you correspond with us by email, post, telephone or text, or via our Websites or information from social media accounts when interacting with us via a personal profile (e.g. Facebook, Instagram, Twitter or LinkedIn) |

We collect and use this personal data for the purposes described in the section: ‘**[How and why we use your personal data]**’ (see below).

We also collect, use and share aggregated data, such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate the data about how you use our Websites to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

If you do not provide personal data

For customers or suppliers who are individuals (this includes sole traders and traditional/unlimited partnerships), where we need to collect personal data to enter into a contract with you and you fail to provide that data when requested, we may not be able to enter the contract with you. This personal data may include your name and contact details. For customers, if you thereafter do not provide personal data we ask for, this may delay or prevent us from providing our services to you.

How your personal data is collected

We collect most of your personal data directly from you – in person, by telephone, text or email and/or via our Websites. However, we may also collect information:

- **From publicly accessible sources**, e.g. Companies House.
- **Directly from a third party**, e.g.
 - a. credit reference agencies.
 - b. advertising networks.
 - c. search information providers.
 - d. an employee or representative of the organisation you represent.
 - e. finance providers (when you use finance in relation to a contract with us).
- **From cookies and similar technologies used on our Websites**, see our [cookie policy] for further details.

- **Via our IT systems, e.g.**
 - a. from door entry systems and reception logs.
 - b. through automated monitoring of our Websites and other technical systems, such as computer networks and connections, CCTV and access control systems, communication systems, email and instant messaging.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason (i.e. a lawful basis) for doing so, e.g.

- to comply with our legal and regulatory obligations.
- for the performance of our contract with you or to take steps at your request before entering into a contract.
- for our legitimate interests or those of a third party.
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use your personal data for, how we use your personal data, our lawful basis for doing so and the categories of personal data we use, depending on our relationship with you.

What we use your personal data for

| Our purpose for using your personal data | What we do with your personal data | Lawful basis relied on under the UK GDPR | What personal data we use |
|--|---|---|---|
| For individual customers (including prospective customers) – to correspond with you about the goods and/or services we offer, provide a quotation, to respond to your queries and provide our goods and/or services to you | We will collect personal data and use it to provide a quotation, to respond to your enquiries about a potential contract and fulfil the terms of the contract with you. We will store your personal data on our IT systems and destroy it in accordance with our data retention and other business policies | Necessary for the performance of our contract with you or to take steps at your request before entering into a contract with you: Article 6(1)(b) UK GDPR | Identity personal data Contact personal data Contract personal data Financial personal data Other personal data |
| For individuals who represent corporate customers with whom we have contracts - to provide the organisation you represent with our goods and/or services | We will collect your personal data and use it to correspond with you about the contract involving the organisation you represent. We will store your personal data on our IT systems and destroy it in accordance with our data retention and other business policies | Necessary for the legitimate interests of the organisation you represent and our legitimate interests e.g. to provide the organisation you represent with our products and/or services: Article 6(1)(f) UK GDPR | Identity personal data Contact personal data Other personal data |

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| For individuals who represent prospective corporate customers e.g. for corresponding with you about the products and/or services we offer, to provide a quotation and to respond to your queries | We will collect your personal data and use it to correspond with you about e.g. the services we offer and quotations, and to respond to your queries about the contract involving the organisation you represent. We will store your personal data on our IT systems and destroy it in accordance with our data retention and other business policies | Necessary for the legitimate interests of the organisation you represent and our legitimate interests e.g. to deal with pre-contractual enquiries or issues: Article 6(1)(f) UK GDPR | Identity personal data Contact personal data Other personal data |
| For other individuals with whom we have contracts e.g. suppliers, for corresponding with you and for taking steps under the contract with you | We will collect your personal data and use it for entering into and managing the contract with you. We will store your personal data on our IT systems and destroy it in accordance with our data retention and other business policies | Necessary for the performance of our contract with you or to take steps at your request before entering into a contract with you: Article 6(1)(b) UK GDPR | Identity personal data Contact personal data Contract personal data Financial personal data Other personal data |
| For other individuals who represent organisations with whom we have contracts e.g. suppliers, for corresponding with you and for taking steps under the contract with your organisation | We will collect your personal data and use it to correspond with you about the contract involving the organisation you represent. We will store your personal data on our IT systems and destroy it in accordance with our data retention and other business policies | Necessary for the legitimate interests of the organisation you represent and our legitimate interests e.g. to manage and take steps under the contract with your organisation: Article 6(1)(f) UK GDPR | Identity personal data Contact personal data Other personal data |
| For other individuals who represent organisations with whom we do not have contracts e.g. prospective suppliers, for corresponding with you about the goods / services your organisation offers and to obtain a price quote | We will collect your personal data and use it to correspond with you about e.g. the goods / services your organisation offers and to obtain a price quote. We will store your personal data on our IT systems and destroy it in accordance with our data retention and other business policies | Necessary for the legitimate interests of the organisation you work for and our legitimate interests e.g. to raise pre-contractual enquiries or issues: Article 6(1)(f) UK GDPR | Identity personal data Contact personal data Other personal data |
| To undertake credit reference checks via external credit reference agencies where it is a condition of us entering into a contract with you | We will collect your personal data and pass it to external credit reference agencies for the | Necessary for our legitimate interests or those of a third party i.e. to ensure our customers are likely to be able to pay for our products and | Identity personal data Contact personal data Financial personal data Other personal data |

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| | purposes of a credit reference check. | services: Article 6(1)(f) UK GDPR | |
| To assist customers with obtaining finance | We will collect your personal data and use it to correspond with you about the obtaining of finance for your contract or the contract involving the organisation you represent. Any personal data collected will be stored on our IT systems and destroyed in accordance with our data retention and other business policies | Necessary for your legitimate interests or the legitimate interests of the organisation you represent i.e. to assist with securing finance: Article 6(1)(f) UK GDPR | Identity personal data Contact personal data Financial personal data Other personal data |
| To deal with manufacturer warranty issues | We will collect your personal data and use it to correspond with you and the manufacturer to resolve the warranty issue. Any personal data collected will be stored on our IT systems and destroyed in accordance with our data retention and other business policies | Necessary for the performance of our contract with you: Article 6(1)(b) UK GDPR Necessary for the legitimate interests of the organisation you represent and our legitimate interests i.e. to ensure that any issues are resolved: Article 6(1)(f) UK GDPR | Identity personal data Contact personal data Contract personal data Other personal data |
| To manage our relationship with you or the organisation which you represent, which may include (where appropriate) notifying you about changes to our terms of business or privacy notice | We will use your personal data to correspond with you where appropriate | Necessary for our legitimate interests i.e. to manage our relationship with you or the organisation you represent, and to analyse and improve the products and/or services we offer: Article 6(1)(f) UK GDPR | Identity personal data Contact personal data Contract personal data Financial personal data |
| To prevent and detect fraud against you or us | We will check and monitor the security of our email and IT systems which hold your personal data and undertake other verification checks of your personal data (as necessary) | Necessary for your and our legitimate interests i.e. to minimise fraud that could be damaging for us and for you: Article 6(1)(f) UK GDPR | Potentially any personal data held |
| For audits, enquiries or investigations by regulatory bodies (e.g. the Information | We will extract your personal data from our IT systems and disclose it as | Necessary for compliance with a legal obligation to which we are subject (e.g. data | Potentially any personal data held |

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| Commissioner's Office) or law enforcement agencies | required by law or further to a court order | protection law or a court order): Article 6(1)(c) UK GDPR | |
| To ensure our business policies are adhered to e.g. policies covering security | We will check our use of your personal data against our business policies | Necessary for our legitimate interests i.e. to make sure we are following our own internal procedures so we can deliver the best service we are able to: Article 6(1)(f) UK GDPR | Potentially any personal data held |
| For operational reasons, such as improving efficiency, financial performance and quality control | We will use relevant personal data in data analysis software and also for manual analysis | Necessary for our legitimate interests or those of a third party e.g. to be as efficient as we can so we can deliver the best service for you or the organisation you represent, at the best price: Article 6(1)(f) UK GDPR | <p>Identity personal data</p> <p>Contract personal data</p> <p>Financial personal data</p> <p>Technical personal data</p> <p>Usage personal data</p> <p>Website enquiry personal data</p> <p>Other personal data</p> |
| To ensure the confidentiality of commercially sensitive information | We will put in place reasonable and appropriate security measures to protect the integrity of our systems that hold your personal data | Necessary for our legitimate interests i.e. to protect trade secrets and other commercially valuable information: Article 6(1)(f) UK GDPR | Potentially any personal data held |
| To prevent unauthorised access and modifications to our systems | We will put in place reasonable and appropriate security measures to protect the integrity of our systems that hold your personal data | <p>Necessary for compliance with a legal obligation to which we are subject (e.g. data protection law): Article 6(1)(c) UK GDPR</p> <p>Necessary for our legitimate interests or those of a third party i.e. to prevent and detect criminal activity that could be damaging for us and for you: Article 6(1)(f) UK GDPR</p> | Potentially any personal data held |
| To update and maintain our customer and supplier records | We will enter and hold your personal data in the relevant parts of our IT systems and we may hold your personal data in manual records | <p>Necessary to take steps at your request before entering into a contract with you: Article 6(1)(b) UK GDPR</p> <p>Necessary for compliance with a legal obligation to which we</p> | Potentially any personal data held |

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| | | <p>are subject (e.g. data protection law): Article 6(1)(c) UK GDPR</p> <p>Necessary for our legitimate interests or those of a third party i.e. to make sure we can keep in touch with you where necessary: Article 6(1)(f) UK GDPR</p> | |
| For staff management, training and administration | We will access and use your personal data held in our IT systems and may use it in emails between our staff and for training purposes | Necessary for our legitimate interests i.e. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service that we are able to: Article 6(1)(f) UK GDPR | Potentially any personal data held |
| To deal with complaints or legal claims against us | We will review your personal data in our IT systems and may collect other information relevant to the complaint/legal claim. We will review any information collected and assess the merits of any complaint or legal claim. We may also communicate with third parties as necessary to seek advice/representation and/or in connection with legal or prospective legal proceedings. Any personal data collected will be stored on our IT systems and destroyed in accordance with our data retention and other business policies | Necessary for our legitimate interests i.e. to ensure that we are able to respond to any complaints or legal claims made against us: Article 6(1)(f) UK GDPR | Potentially any personal data held |
| <p>To market our goods and/or services to –</p> <ul style="list-style-type: none"> - existing and former customers - third parties who have previously expressed interest in our goods and/or services - third parties with whom we have had no previous dealings | We will use your personal data to send you marketing material | <p>For prospective customers - necessary for our legitimate interests i.e. to promote our goods and/or services: Article 6(1)(f) UK GDPR</p> <p>For customers - with your consent: Article 6(1)(a) UK GDPR</p> | <p>Identity personal data</p> <p>Contact personal data</p> <p>Other personal data</p> |

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| To market selected third party goods and/or services to existing customers | We will use your personal data to send you marketing material | Necessary for your, our and the third party's legitimate interests i.e. to promote third party goods and/or services that we think will be of benefit to your business: Article 6(1)(f) UK GDPR | |
| To enforce or apply terms and conditions (including debt recovery) or any other agreements relating to our Websites | We will review your personal data held in our IT systems and, if appropriate, use it to take enforcement action, including legal proceedings | Necessary for our legitimate interests i.e. to enforce our legal rights and protect our business: Article 6(1)(f) UK GDPR | Identity personal data Contact personal data Contract personal data Financial personal data Other personal data |
| To administer and protect our business and our Websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | We will use your personal data held in our IT systems | Necessary for our legitimate interests e.g. for running our business, network security and to prevent fraud: Article 6(1)(f) UK GDPR Necessary for compliance with a legal obligation to which we are subject (e.g. data protection law): Article 6(1)(c) UK GDPR | Potentially any personal data held |
| To improve our Websites and your experience through the use of cookies | We will use personal data collected via cookies and other similar technologies on our Websites. Any personal data collected will be stored on our IT systems and destroyed in accordance with our data retention and other business policies | Necessary for your and our legitimate interests i.e. to understand how our Websites are used, keep our Websites updated and relevant, improve your user experience and to develop our business: Article 6(1)(f) UK GDPR | Technical personal data Usage personal data |
| For testimonials on our Websites | We will collect personal data and use it for publishing testimonials on our Websites. Any personal data collected will be stored on our IT systems and destroyed in accordance with our data retention and other business policies | With your consent: Article 6(1)(a) UK GDPR | Identity personal data Other personal data |
| To invite reviews of our products and/or services | We will collect personal data and use it to analyse our products and/or services. Any personal data collected will be | Necessary for our legitimate interests e.g. to ensure a consistently high level of | Identity personal data |

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| | stored on our IT systems and destroyed in accordance with our data retention and other business policies | product and customer service: Article 6(1)(f) UK GDPR. | Other personal data |
| For training and monitoring service levels (call recording) | We will use personal data collected during telephone calls for analysis and to train staff | Necessary for our legitimate interests e.g. to ensure a consistently high level of customer service: Article 6(1)(f) UK GDPR | Potentially any personal data held |
| For crime prevention and detection purposes (CCTV) | We will collect personal data from CCTV and retain it in accordance with our data retention and other business policies | Necessary for our legitimate interests e.g. to ensure the safety of our visitors and staff and the protection of our business: Article 6(1)(f) UK GDPR | Identity personal data Other personal data |
| For recording and/or reporting accidents at our premises or connected with our services or business | We will use any personal data collected to (where appropriate) deliver first aid, call the emergency services and record/report the accident. Any personal data collected will be stored on our IT systems and destroyed in accordance with our data retention and other business policies | Necessary for compliance with a legal obligation to which we are subject (e.g. health and safety legislation): Article 6(1)(c) UK GDPR | Identity personal data Other personal data |
| To provide personal data to other third parties that have or may acquire control or ownership of our business or part of our business (and our or their professional advisers) in connection with a corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency | We will extract your personal data from our IT systems and disclose it as necessary | Necessary for your and our legitimate interests (e.g. to ensure continuity of our business and services): Article 6(1)(f) UK GDPR | Potentially any personal data held Where possible information will be anonymised during a transaction and until completion of the transaction but this may not always be possible |

Where we rely on consent as a lawful basis to process your personal data, you have the right to withdraw your consent at any time. To do this, please telephone, email or write to us (see below: '[How to contact us]').

Please note that we may process your personal data without your knowledge or consent where this is required or permitted by law.

How and why we use special category data

Under data protection law, we can only use special category data where:

- we have a proper reason for doing so (see above: '[How and why we use your personal data]'); and
- one of the potential 'grounds' for using special category data set out in data protection law applies to our use.

Marketing communications

We may use your personal data to send you periodic communications by email and post about our goods and/or services and events that might be of interest to you.

Third party marketing

We may from time to time telephone you or send you communications by email and post about selected third party goods and/or services which we think will be of interest to you.

We will get your express opt-in consent before we share your personal data with any other company for marketing purposes.

You have the right to opt-out of receiving marketing communications at any time by:

- emailing Datacompliance@4com.co.uk;
- writing to us at One Lansdown Plaza, 24b Christchurch Road, Bournemouth, Dorset, BH1 3NE (for the attention of The Compliance Director); or
- using the 'unsubscribe' link in our emails

We may ask you to confirm or update your marketing preferences if you instruct us to provide further goods and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

Who we share your personal data with

Depending on the circumstances, we may share your personal data with:

| Category of recipient | Further details of recipients | Use by recipient | Relevant categories of personal data that may be shared with the recipient (depending on service provided/reason for sharing) |
|---|---|--|---|
| Our insurers, brokers and professional advisers in the event of a complaint or legal claim against us or where we require external advice or assistance | Professional advisers e.g. solicitors, barristers, IT specialists | For assisting, advising and representing us as necessary | Potentially any personal data held |

| | | | |
|--|--|---|--|
| Credit check / identity check provider | | To provide the results of a credit check / identity search | Identity personal data Contact personal data Financial personal data |
| Finance providers | | To process your application for finance | Identity personal data Contact personal data Contract personal data Financial personal data |
| Our bank | HSBC | For processing financial transactions | Identity personal data Contact personal data Financial personal data |
| Our regulator (where applicable) | Financial Conduct Authority | For assessing our compliance with our regulatory and professional obligations | Potentially any personal data held |
| External IT service providers | e.g. IT platform hosting provider, website hosting provider, IT support, email security, email service provider, document management providers, application software providers | For providing the relevant IT service to us | Identity personal data Contact personal data Contract personal data Financial personal data IT Systems personal data Technical personal data Usage personal data Website enquiry personal data Other personal data |
| Delivery companies | | For providing the relevant service to us | Identity personal data Contact personal data |
| Credit card payment facility provider | Worldpay | For providing the relevant service to us | Identity personal data Financial personal data |
| Other external service providers | e.g. data analytics providers | For providing the relevant service to us | Identity personal data Contact personal data |

| | | | |
|---|--|---|--|
| | | | Technical personal data Usage personal data Other personal data |
| Law enforcement/regulatory agencies | e.g. the Information Commissioner's Office | For their investigations | Potentially any personal data held |
| Companies within the Group | | For the purposes of 1) our contract with you or the organisation you work for or represent 2) the procurement of finance 3) customer support 4) marketing | Identity personal data Contact personal data Contract personal data Financial personal data Marketing personal data Website enquiry personal data Other personal data |
| Other parties that have or may acquire control or ownership of our business or part of our business (and our or their professional advisers) in connection with a corporate transaction or restructuring, including a merger, acquisition or asset sale or in the event of our insolvency | | | Potentially any personal data held Where possible information will be anonymised during a transaction and until completion of the transaction but this may not always be possible |

We only allow our service providers (where they process personal data on our behalf) to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on those service providers to ensure they can only use your personal data to provide services to us.

How long your personal data will be kept

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including;

- to meet our obligations to you or to the organisation you represent in respect of goods and/or services you/ the organisation you work for or represent engage us to supply;
- to respond to any questions, complaints or claims made by you/the organisation you represent;
- to show that we treated you fairly; and
- to keep records required by law to comply with our legal and regulatory obligations.

We will not retain your personal data for longer than necessary for the purposes set out in this privacy notice.

If we are no longer providing goods or services to you or the organisation you represent, we will usually delete or anonymise your account data after ten years (personal data collected to verify your identity will be deleted once your identity is verified).

Transferring your personal data outside of the UK

It is sometimes necessary for us to transfer your personal data outside the UK e.g. to our external IT or other service providers located outside the UK (see above: '[**Who we share your personal data with**]')).

If this is necessary, we will ensure the transfer complies with relevant data protection law by ensuring that e.g.

- the country to which the personal data is being transferred is subject to an adequacy regulation further to Article 45 of the UK GDPR i.e. it has been decided by the UK government that the particular country ensures an adequate level of protection of personal data. A list of the countries the UK currently has adequacy regulations in relation to is available [here]. We rely on adequacy regulations for transfers to the following countries: the Netherlands;
- the transfer is necessary for the performance of a contract between you and us further to Article 49 of the UK GDPR;
- the transfer is necessary to establish, exercise or defend legal claims further to Article 49 of the UK GDPR;
- there are appropriate safeguards in place between us and the organisation receiving it together with enforceable rights and effective legal remedies for you (e.g. by the use of approved data protection contractual terms); or
- you have provided explicit consent to the proposed transfer after being informed of any potential risks under Article 49 of the UK GDPR.

Please contact us (see below: '[**How to contact us**]') if you want further information on the specific mechanism used by us when transferring your personal data outside of the UK.

Your rights

You have the following rights, which you can exercise free of charge:

| | |
|---|---|
| Access | The right to be provided with a copy of your personal data |
| Rectification | The right to require us to correct any mistakes in your personal data |
| Erasure (also known as the right to be forgotten) | In certain situations, the right to require us to delete your personal data |
| Restriction of processing | In certain situations, the right to require us to restrict processing of your personal data e.g. if you contest the accuracy of the data. You can ask us to stop processing the personal data whilst we look into the accuracy issues |
| Data portability | In certain situations, the right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party |
| To object | The right to object in certain situations to our continued processing of your personal data e.g. where processing is carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims |
| To withdraw consent | <p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time. To do this, please telephone, email or write to us (see below: 'How to contact us').</p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.</p> |

We do not use your personal data for automated decision making (including profiling) that produces legal effects concerning you or similarly significantly affects you.

For further information on each of the above rights, including the circumstances in which they apply, please contact us or see the [\[Guidance from the UK Information Commissioner's Office on individuals' rights under the General Data Protection Regulation\]](#).

If you would like to exercise any of the above rights, please email, write or telephone us (see below: '**How to contact us**') and provide us with enough information to identify you as well as what right you want to exercise and the personal data to which your request relates.

Keeping your personal data secure

We have put in place reasonable and appropriate security measures to endeavour to prevent personal data from being accidentally lost, used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

For users of our Websites, unfortunately, the transmission of information via the internet is never completely secure. We cannot therefore guarantee the security of your data transmitted via our

Websites; any transmission is at your own risk. Our Websites may, from time to time, contain links to other websites plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices / policies. When you leave our Websites, we encourage you to read the privacy notice / policy of every website you visit before you submit any data to these websites.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to complain

We hope that we can resolve any query or concern you may raise about our use of your personal data. If you want to complain about how we have used your personal data, please email or write to us or call us (see below: '[**How to contact us**]'). However, if we are not able to resolve your complaint to your satisfaction, you can complain to the Information Commissioner's Office (ICO). Further information about how to make a complaint to the ICO can be found on the ICO website www.ico.org.uk.

Changes to this privacy notice

We may change this privacy notice from time to time and when we do so we will inform you via our Websites. If any changes are likely to have an adverse impact on your rights under data protection law, we will use reasonable endeavours to notify you of the changes in advance in writing or by alternative means.

Changes to your personal data

It is important that the personal data we hold about you is accurate and current.

Please let us know if you change your name, address or any other personal details (see below: '[**How to contact us**]').

How to contact us

If you have any queries about this privacy notice or how we use your personal data, you can contact us by email, post or telephone as follows:

| | |
|-------------------|---|
| Email: | Datacompliance@4com.co.uk |
| Telephone: | 0330 444 444 |
| Post: | One Lansdown Plaza, 24b Christchurch Road, Bournemouth, Dorset, BH1 3NE (for the attention of The Compliance Director) |

Do you need extra help?

If you would like this privacy notice in another format (for example large print) please contact us (see above: '[**How to contact us**]').

[Please insert date of privacy notice]

[Please insert document version number]