

Privacy Policy Statement

Version: 1.0

Date: 05/04/2020

1. Introduction

Welcome to INTERCOMMUNICATIONS Limited's Privacy Statement.

We understand that your privacy is important and that you care about how your personal information is used.

This document should help you understand that we only collect and use personal data in ways that are described in this statement, and in a way that is consistent with our obligations and your rights within the law.

2. Information about Us

We are INTERCOMMUNICATIONS LTD. A limited Company registered in Wales under company number **11929482** and registered with the Information Commissioner's Office (ICO) with registration number **ZA745350**.

Our Registered address is B11 Trem y Dyffryn, Denbigh, Denbighshire, LL16 5TX. Our VAT Register number is **322 9550 09**. You can also identify us with our D-U-N-S number **224981411**.

INTERCOMMUNICATIONS LTD, referred to as "We", "Our", "us" and "In2Com" in this document, is the controller of your information and is responsible for your personal data.

If you have any concerns about how we store and process your personal information you can contact our Data Protection Officer by email dpo@in2com.co.uk or by calling 01745 335984

Any changes to this privacy notice will be published on our website.

3. What Does This Policy Cover?

This Privacy Statement explains how we use your personal data: how it is collected; how it is held; and how it is processed. It also explains your rights under the law relating to your personal data.

4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

Throughout this document the terms 'personal data' and 'personal information' are frequently used interchangeably and can be assumed to have the same meaning.

5. What Data Do We Collect?

Depending upon your use of our websites, how you are supplied our services, and how you use our services we supply to you, we may collect and hold some of your personal and non-personal data.

The different types of information we may collect, use, store and transfer include:

Your Identity: First name, last name, username, access identifier, title and date of birth.

Your Contact Data: Home Address, Work Place Address, Delivery Address, Email Address, Telephone Number.

Your Financial Data: Bank Account and Payment Details

Transaction Data: Payments or Communications from you and other details of services you have purchased.

Technical Data: IP Address, login data, browser type and version, time zone, location, browser plug-in type and version, operating system, and other technical data on devices you use to access our websites.

Profile Data: Username, passwords, purchase reference orders, preferences, and feedback data.

Usage Data: Information collected about how you use our services.

Sales Communications Data: Your preferences in receiving sales or marketing information from us.

Please be aware, in all circumstances, we do not collect any sensitive personal data, personal data relating to children, or data relating to criminal convictions and/or offences. We also do not collect other special personal information about you such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform that contract (for example, to provide you with a service). In this case, we may have to cancel a service or order you have with us and we will notify you of this at the time

5. How Do We Use Your Personal Data?

We only use your personal data when we have a lawful basis that allows us to, and we will only use your personal data in the following circumstances:

5.1 Where we need to form a contract with you for the supply of goods and services;

5.2 Where is it necessary for either us or those of a third-party with legitimate interests, and accordingly, that your fundamental rights do not override those interests; and

5.3 Where we need to comply with a regulatory or legal obligation.

We will always obtain your express opt-in consent before sharing your personal data with third parties for marketing purposes and you will be able to opt-out at any time.

What We Do	What Data We Use	Our Lawful Basis
New customer account or changes to an existing account.	Identity Contact	The performance of a legal contract.
The processing and delivery of an order for goods and services including the management of payment, payment collection, and service charges.	Identity Contact Financial Transaction Sales Communications	The performance of a legal contract and necessary legitimate interests.
Management of our business relationship including: notifications of changes to our terms and conditions; notifications of changes to our privacy policy; asking you to take part in a survey; and to provide information to you where we need to make you aware of our regulatory obligations.	Identity Contact Profile	The performance of a legal contract, necessary legitimate interest and to comply with a legal obligation.
Complete surveys sent to you by a third-party supplier or government agency	Identity Contact	Necessary for our legitimate interests and to help improve service levels and ensure all parties are performing their service obligations.
Administration activities to protect our business operations and websites including customer support, monitoring, system maintenance, troubleshooting technical issues, data analysis, and service reports.	Identity Contact Technical Data Profile	Necessary legitimate interests for the safe operation of our business, and to comply with legal obligation.

6. How Do We Collect Your Personal Data?

We collect data from you and about you in the following different ways:

6.1 Direct Interactions

You may provide us with your personal information when we directly correspond and will include personal data collected when you apply for a new service, create a new account, subscribe to a service, or provide feedback following the use of a service.

6.2 Third Party or Public Records

We may receive personal data about you from various third parties, including our suppliers, and public sources such as Companies House or the Electoral Register.

6.3 Automated Interactions

We may automatically collect some technical data about you and your equipment as you interact with our websites.

7. What Personal Data Would We Share?

We may need to share your personal data with other external parties for our necessary legitimate, and lawful interests.

External third parties may include: IT Support services providers; Professional advisers, including lawyers, bankers, auditors, and insurers; HM Revenue & Customs, regulators and other authorities who may require reporting of processing activities; Fraud Prevention Agencies; Credit Reference Agencies; and Supplier Service Providers we use to supply services to you.

A list of the third parties we share your personal data within relation to our products and services is available on request.

8. How Do We Secure Your Personal Information?

We take great care to protect your personal identity and recognise the importance of maintaining the integrity and confidentiality of your personal information.

We limit access to your personal data to those employees, agents, contractors, and other third parties that have a legitimate need to know and ensure that they are subject to duties of confidentiality.

When personal information is being accessed, or transferred, over the Internet we encrypt the data between endpoints. We also store, where possible information in an encrypted form in repositories and/or encrypted storage systems.

Most of the information we retain is stored and processed within the service platforms we hold physically the UK. This means that it will be fully protected under the Data Protection Legislation. However, the storage system's physical location for some data, such as backups,

may from time-to-time be stored in data facilities outside the UK.

We accept, where we are legally required to do so, that when dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) that we include notifying you and/or the Information Commissioner's Office of such breaches.

9. How Long Will We Keep Your Personal Data?

We will not keep your personal data for any time longer than is necessary considering the reason(s) for which it was first collected

Your personal data, will generally, only be retained and/or processed if you use our services or if you are a customer.

However, an exception may occur when we may retain some personal information beyond this time frame, for example at the end of a contract because we have a legal requirement to retain certain information, or the billing cycle is in arrears or for some reasons you have requested this information be retained.

In some circumstances we, or our suppliers, may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we, and our suppliers may use this information indefinitely without further notice to you.

10. How Can I access My Personal Data?

If you want to know what personal data, we hold about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown above.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 7 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. What Are My Legal Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

11.1) The right to be informed about our collection and use of your personal information. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.

11.2) The right to access the personal information we hold about you.

11.3) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.

11.4) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold.

11.5) The right to restrict (i.e. prevent) the processing of your personal data.

11.6) The right to object to us using your personal data for a particular purpose or purposes.

11.7) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.

11.8) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

11.9) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

12. How to Contact us?

If you have any concerns about how we store and process your personal information you can contact our Data Protection Officer by email to dpo@in2com.co.uk, by calling 01745 335984, or in writing to the postal address INTERCOMMUNICATIONS LTD, B11 Trem y Dyffryn, Denbigh, Denbighshire, LL16 5TX.