

# Privacy Statement

## Introduction

This Privacy Statement explains how we use the personal information collected about individuals, sole traders or partnerships, how your data is stored, handled and kept safe and secure.

### 1. About this policy

This policy applies to The Pinnacle Group of companies (here forth referred to as “Pinnacle”) including:

- ▶ iPinnacle Limited
- ▶ The Word Telecom Limited
- ▶ Pinnacle Communications Limited

For contact details for these companies see section 11 below.

Unless otherwise stated all processing activities detailed in this policy are undertaken by all Pinnacle companies.

It also describes your data protection rights, including a right to object to some of the processing which Pinnacle carries out. More information about your rights, and how to exercise them, is set out in the section 10 of this notice

Pinnacle take your privacy very seriously and are committed to providing you with a personal service that meets your needs, at the same time as protecting that privacy.

### 2. How we'll communicate with you

When we first collect your personal information, or when you get a new service or product from us, we'll give you the opportunity to tell us if you don't want to receive marketing information from us about our and third parties' (such as network providers) other products and services. It will normally be a tick box on an order or contract, and you can change your mind at any time – see section 12 of this policy for more details.

### 3. How we use your data and explanation of the legalities

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

#### Consent

In specific situations, we can collect and process your data with your consent.

*When you tick a box to receive email newsletters, agree that we can telephone you with details of marketing offers or competitions or agree that we can use cookies (as set out in this policy).*

## **Contractual obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations. When collecting your personal data, we'll always make clear to you, which data is necessary in connection with a particular service.

*If you order an airtime contract from us whose airtime services are provided by one of the UK mobile network providers, we'll collect your name, address, telephone number, date of birth, employment status, proof of address and proof of identification to credit check you for the provision of the airtime over the agreed term, to verify your identity, to communicate with you in connection with the services which you buy from us and to provide support services to you.*

*Also, to provide you with alert notifications you have requested, for example, if you have requested a data alert when you reach a certain threshold.*

## **Legal compliance**

If the law requires us to, we may need to collect and process your data.

*We can pass on details of people involved in fraud or other criminal activity affecting Pinnacle to law enforcement, tax and immigration services.*

## **Legitimate interest**

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

*We will use your purchase history to send you or make available personalised offers and we monitor use of our websites and online services, and use your information to help us monitor, improve and protect our products, content, services and websites, both online and offline.*

*We also combine the purchase history of many customers to identify trends and ensure we can keep up with demand, and/or develop new products/services. We record [inbound and] outbound calls made to our customer support line and may also use your data as part of processes to help train our staff.*

*We will also use your address details to send you direct marketing information by post, telling you about our and third parties' products and services that we think might interest you.*

*We will send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Statement, service changes, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. Of course, you are free to opt out of receiving these requests from us at any time by contacting us using the address at the end of this policy to update your preferences with us.*

We will use your personal data to prevent, investigate and/or report fraud, security incidents or (if necessary) illegal activity in accordance with applicable law. To protect our business and your account and our business. This includes using your personal data to maintain, update and safeguard your account.

We operate CCTV systems in some of our offices which record images for security.

We will use data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).

We use data of some individuals to invite them to take part in market research

We develop, test and improve the systems, services and products we provide to you and this may involve the processing of your personal data.

If you apply for a job with us we will use your information in connection with our consideration of your application.

We have carried out balancing tests for all the data processing we carry out on the basis of our legitimate interests, which we have described above. You can obtain information on any of our balancing tests by contacting us using the details set out later in this notice.

#### 4. When do we collect your data?

- ▶ When you make an enquiry with us
- ▶ When you create an account with us
- ▶ When you purchase products or services from us
- ▶ When you sign up to receive our newsletter
- ▶ When you have given a third-party permission to share with us the information they hold about you
- ▶ We may collect data about you from publicly available sources (such as credit agencies) when you have given your consent to share information or where the information is made public as a matter of law
- ▶ When you visit one of our offices which usually have CCTV systems operated for the security of both customers and staff. These systems may record your image during a visit
- ▶ We may record calls to or from our offices for training and quality purposes. These systems may record your voice during calls

#### 5. What sort of data do we collect?

##### Requirements by customer type (individual/sole trader/partnership) for credit assessment or airtime contracts

###### Individuals

- ▶ Name, address (and previous address/es if at current address/es less than 3 years), telephone number, date of birth, bank account details (if setting up an airtime contract), employment status, proof of address and proof of identification.

###### Sole Trader

- ▶ Three or less monthly mobile contracts – 1 x Individual proof of identification, 1 x proof of address
- ▶ Four or more monthly mobile contracts – Business letterhead, 1 x individual proof of identification and 1 x bank statement, or utility bill in the business name and dated within the last 3 months

###### Partnership

- ▶ 1 x individual proof of identification, 1 x business proof and a business purchase order

Note: quantity of proofs required may vary according to the requirements of the airtime provider. We will only request the actual quantity required to fulfil the requirements of the selected airtime provider, or our own.

##### General data collected

- ▶ Details of interactions with us by phone, letter, email or text. *For example, we collect notes from conversations with you, about your account, change requests, purchases, complaints or comments.*
- ▶ Information gathered by use of cookies in your web browser
- ▶ Personal details that help us to recommend items of interest. *For example, you may advise us that your last phone had a broken screen display, and we may therefore recommend mobile insurance*
- ▶ Your image may be recorded on CCTV when you visit one of our offices

- ▶ Your voice may be recorded during telephone conversations with our offices
- ▶ To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visits, the advertisements you clicked on, and any search terms you entered.

## 6. How do we protect your personal data and cookies?

We may use ‘cookies’ to monitor how people use our website. This helps us to understand how our customers and potential customers use our website, so we can make changes to improve the overall customer experience. This may include changes to layout, function and design.

What is a ‘cookie’?

A cookie is a piece of information stored on your computer's hard drive that records how you've used a website. The next time you visit that website, it can tailor your options based on the information it has stored about your last visit.

How can you stop using ‘cookies’?

You can normally alter the settings of your browser to prevent it from accepting cookies, or to tell you when a website tries to put a cookie on your computer. (But you might not be able to use some of the products or services on our website without cookies.)

## 7. How long do we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. In the case of personal processed in connection with our provision of services that means [6] years from the date of the date of expiry or termination of any contract that you have with us.

At the end of that retention period, your data will either be deleted completely or completely anonymised so that it is not personal data for the purposes of data protection law.

## 8. The policy we apply to sharing your personal data

We sometimes need to share your personal data to fulfil your requirements. Third party recipients include:

- ▶ Network providers for the provision of airtime. For example, Vodafone
- ▶ Courier companies and the GPO for delivering goods and documents.
- ▶ Repair companies to repair customer electronic goods. For example, mobile phone repair.
- ▶ Billing providers who are used to enable us to provide billing
- ▶ Bulk email and marketing tools to allow bulk email sending and track unsubscribes (opt-out)

This is how we keep your data safe and protect your privacy:

- ▶ We only provide the information required for them to perform their specific services.
- ▶ They may only use your data for the exact purpose we specify in our contract with them.
- ▶ We perform a due diligence process and ensure that our third-party organisations comply with applicable data protection laws.
- ▶ We work closely with third-party organisations to ensure your privacy is respected and protected at all times.
- ▶ If we stop using a third-parties services, any of your data held by them will either be deleted or rendered anonymous.

## 9. Where your data may be processed

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such as Australia or the USA. *For example, this might be required in order to fulfil your order, process your payment details or provide support services.*

If we do this, we will ensure your data receives the same protection as if it were being processed inside the EEA for instance by signing approved form model clauses with the recipient.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Statement.

## 10. What are your rights over your personal data?

Your right to request:

- ▶ A copy of the personal data we hold about you, free of charge. A fee may be levied if a copy of previously provided data is requested again.
- ▶ The correction of your personal data when incorrect, out of date or incomplete.
- ▶ That we stop using or restrict use of your personal data for direct marketing (either through specific channels, or all channels).
- ▶ That we stop any consent-based processing of your personal data after you withdraw that consent.
- ▶ To ask us to share (port) this data to another controller.
- ▶ Rights to challenge automated decisions made using your personal data without human involvement which significantly affect your rights.

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Statement.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act. These rights may be limited, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

You can contact us to request to exercise these rights at any time as follows:

### Contact Data Protection Request

**iPinnacle Limited**, 258 Waterloo Road, London, SE1 8RG or email [DataRequest@pinnaclecoms.com](mailto:DataRequest@pinnaclecoms.com). To request an amendment to your data, please contact our support team on +44 (0) 207 401 4780 or email [support@pinnaclecoms.com](mailto:support@pinnaclecoms.com).

**The Word Telecom Limited**, Link House, Britton Gardens, Bristol, BS15 1TF or email [DataRequest@thewordtelecom.co.uk](mailto:DataRequest@thewordtelecom.co.uk). To request an amendment to your data, please contact our support team on +44 (0) 117 303 3370 or email [support@thewordtelecom.co.uk](mailto:support@thewordtelecom.co.uk).

All personal data requests will be responded to as promptly as possible, and within no longer than 1 month.

If we choose not to action your request, we will explain to you the reasons for our refusal.

### **Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### **Where we rely on our legitimate interest**

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

## **11. How can you stop the use of your personal data for direct marketing?**

To stop direct marketing communications from us:

- ▶ Click the ‘unsubscribe’ link in any email communication that we send you. We will then stop any further emails from that company.
- ▶ Email or write to:
  - ▷ iPinnacle – Email [DataRequest@pinnaclecoms.com](mailto:DataRequest@pinnaclecoms.com) or write to iPinnacle Limited, 258 Waterloo Road, London, SE1 8RG
  - ▷ The Word Telecom – Email [DataRequest@thewordtelecom.co.uk](mailto:DataRequest@thewordtelecom.co.uk) or write to The Word Telecom Limited, Link House, Britton Gardens, Bristol, BS15 1TF
  - ▷ Pinnacle Communications Limited – Email [DataRequest@pinnaclecoms.com](mailto:DataRequest@pinnaclecoms.com) or write to iPinnacle Limited, 258 Waterloo Road, London, SE1 8RG

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

## **12. The Regulator**

If you feel that your data has not been handled correctly, or you are unhappy with the response to your requests regarding your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO).

They can be contacted by calling +44 (0) 303 123 1113 or online at their website address [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (please note we cannot be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

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