# **Privacy Notice**

Customers

















# **Privacy Notice**

#### What information do we collect from you?

- Your name
- Your job title
- The name of the organisation you work for
- Your address
- Your mobile and/or fixed-line telephone number
- Your email address
- Your mobile account number
- Details of calls made and text messages sent using services we supply to you
- Referrals to third parties who may be interested in our products or services
- Feedback you provide on our customer service
- Any information about yourself, or your personal life, which you volunteer or otherwise willingly share with us in conversation

#### Why do we collect this information?

You are a contact nominated by one of our customers.

We will process your Personal Data under our legitimate interests, which are:

- Direct marketing of our entire product and services portfolio, including those that we resell on behalf of other members of our group of companies
- Customer service
- Account management
- Accepting customer referrals that result in financial rewards for the referrer
- Soliciting customer feedback on the customer service they experience
- Building a long-standing personal relationship with contacts at the customers we supply with products and services

If you are a consumer, a sole trader or representing a partnership, we will also process:

- Your name
- The name of the organisation you work for (if provided)
- Your current address

under our mutual contract to deliver your products and services and to fulfil our legal obligations under taxation law; and further process

- Your address history over the last three years
- Your bank details















• The results of any checks to confirm your identity, assess your credit risk and prevent fraud, terrorism or money laundering

to support our legitimate interests of

- Assessing the credit risk or prospective customers and customers
- Ensuring that prospective customers and customers have disclosed their identity
- Preventing fraud, terrorism or money laundering

Should you have registered one or more of your telephone numbers with the Telephone Preference Service (TPS) or the Corporate Telephone Preference Service (CTPS), we will only call you for marketing purposes if you have given your consent for us to do so.

If you are a consumer, sole trader or representing a partnership, we will only send you marketing emails if you have given your consent for this, or you have purchased a similar product or service from us in the past.

We will use referrals you provide to us to operate a referral scheme, including determining and distributing the financial rewards received.

The information we collect from you is categorised as contact details, usage details, referral detail and customer feedback.

#### Where did we get your information?

Your details have been collected from you directly, supplied by the organisation you work for; or we have collected them from publicly available sources such as your organisation's website or LinkedIn.

#### Who might we share your information with?

We will share your name and employing organisation with any prospective customers that you refer to us.

We will also share your Personal Data with British local and central government bodies and agencies; to the extent required by law.

If you are a consumer, sole trader or partnership we will share your Personal Data with our suppliers appointed for the purpose of verifying your identity and assessing your risk associated with credit, fraud, terrorism or money laundering.

## Can I opt out?

Please contact us at privacy@welcomm.co.uk if you want to opt-out of direct marketing.

If you have given your consent to receive marketing emails from us you can withdraw this by contacting us at privacy@welcomm.co.uk.















Where one or more of your telephone numbers are registered with the TPS or CTPS, you can withdraw your consent for us to market to you by phone by letting us know at privacy@welcomm.co.uk.

If you don't want us to use information about yourself, or your personal life, that you have volunteered or otherwise shared with us, you can opt-out by contacting us at privacy@welcomm.co.uk

#### What do we do with your information?

We will use your Personal Data to communicate with you regarding the products and services we supply to your organisation.

Where you have referred potential customers to us, we will tell them that you made the referral when we process this, and operate a referral scheme for your referrals.

In cases where you have provided us with feedback on our customer service, we will use this to improve and influence the products, services and customer experience we provide.

If you a consumer, a sole trader or representing a partnership, we will undertake checks to confirm your identity and understand your risk for credit, fraud, terrorism or money laundering.

Where you have shared information about yourself, or your personal life with us, we will use this to build a close personal relationship with you.

## How long do we keep hold of your information?

Your Personal Data will be retained for up to 24 months after your organisation ceases to be our customer.

If you are a consumer, a sole trader or representing a partnership, we will retain:

- Your name
- The name of the organisation you work for (if provided)
- Your address

for up to seven years after you last purchased a product or service from us.

Where we have conducted checks to understand credit risk, or the risks posed by fraud, terrorism or money laundering, we will retain and use the Personal Data you have provided for these checks for up to one month after they have been completed. The results of the checks themselves will be retained for up to seven years for fraud, terrorism or money laundering risk; and up to one month for credit risk.















If you are a consumer, a sole trader or representing a partnership and you become one of our customers, we will retain the results of any credit risk and identity verification checks that have been performed until we next assess your credit risk.

Where you have volunteered, or otherwise willingly shared information about yourself or your personal life with us, we will only retain this while we are in regular contact with you.

#### What are your rights?

You can contact us at privacy@welcomm.co.uk and:

- Ask us to provide a copy of the Personal Data for you that we hold or process.
- Request that we make a correction to the Personal Data for you that we hold or process.
- Object to our processing of your Personal Data.
- Where we use your Personal Data for automated decision making; ask us to process it manually or re-consider any decisions made.

If you are unhappy with our processing of your Personal Data; or our handling of a related request you can complain to the ICO at https://ico.org.uk/concerns or contact them by telephone on 0303 123 1113.

You also have the right to take legal action if you are not satisfied with our handling of your Personal Data; or how we deal with a related request.

#### Is your information used for any automated decision making?

We only process Personal Data for the purpose of automated decision making when verifying your identity and assessing credit, fraud, terrorism or money laundering risks.

Where your Personal Data is used in support of checks concerning the verification of your identity and assessing your credit risk:

- You can ask us to process your Personal Data manually; and to re-consider any automated decisions that have been made.
- The conduct of the checks may leave a footprint on your credit history, as recorded by credit reference agencies.

Please let us know at <u>privacy@welcomm.co.uk</u> if you wish for your Personal Data to be processed manually, or want us to re-consider an automated decision we have made.

## Will your information be transferred overseas?

From time to time, our suppliers may store and process your data outside the European Economic Area (EEA), in the United States.















When this occurs, your Personal Data is safeguarded by our policy of using suppliers who have adopted European Union (EU) Model Clauses; or who hold a current Privacy Shield certification for their US-based operations.

#### What are our contact details?

This Privacy Notice is issued by Welcomm Communications Limited.

Our principal place of business is 24 The Point, Market Harborough, Leicestershire, LE16 7QU.

#### You can contact us:

- By post, using the postal address given above.
- By Telephone, on the contact number published on our website.
- By email using privacy@welcomm.co.uk











