

## **Privacy Policy**

This privacy policy sets out how Fastnet uses and protects any information that you give Fastnet or we collect from you. Fastnet is committed to ensuring that your privacy and personal data is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy policy. Fastnet may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 20 September 2010 and was revised on 6 June 2017 and 24 May 2018. This policy will be reviewed at least every 3 years or as and when required.

Fastnet International Limited is the controller and responsible for your personal data (referred to as "Fastnet", "we", "us" or "our" in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions, including any requests to exercise your legal rights, please contact [dataprotection@fastnet.co.uk](mailto:dataprotection@fastnet.co.uk) or use the following details.

Data Protection Officer  
Fastnet International Limited  
Shaftesbury Court  
95 Ditchling Road  
Brighton  
BN1 4ST

Tel: 01273 688088

### **Data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store and transfer the following different kinds of personal data about you:

Full name and job title

Contact information including email address

Demographic information such as postcode

IP address

Financial information

Information on how you use our website, products and services

Other information relevant to customer surveys and/or offers

We do not collect any Special Categories of Personal Data about you (this includes 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). We do not collect any information about criminal convictions and offences.

If you fail to provide the personal data required by law, or under the terms of the contract we have with you, we reserve the right to cancel the contract and therefore any services you have with us. We will notify you of this at the time.

## **How do we get your information?**

We have some different methods of collecting information. You may supply us with your identity, contact and financial details via our website, email, phone or post.

This may include personal data you provide when you; apply for our products or services, subscribe to our service or publications, request marketing information to be sent to you complete a survey or provide us with some feedback.

As a business only service provider we may request or receive information (contact, financial and transactional) on your company from various third parties such as Credit Agencies, data brokers and Companies House based inside the EU. In addition we may use analytic companies such as Google within the EU to collect technical data.

## **How we use cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

## **Lawful basis for processing of data including basis for legitimate interests**

We collect and process your personal data for a variety of purposes which are set out in more detail below. In some cases, we will ask for your consent so that we may process your personal data. However in many instances consent is not required including:

Meeting our contractual obligations to you.

Fulfilling orders you have placed.

Contacting you in relation to any issues with your order or use of our services

Contacting you in relation to the provision of the services.

Where we need to provide your personal data to our 3<sup>rd</sup> party service providers related to the provision of the services.

To comply with legal obligations.

To comply with laws, regulators, court orders, or other legal obligations, or pursuant to legal process.

## **Legitimate interests.**

To operate our business and provide the services except where such interests are overridden by your fundamental rights and freedoms.

Legitimate interests include:

Communicating with you with regard to the services, including to provide you important notices regarding changes to our Terms and Conditions.

Responding to your requests, enquiries, and complaints.

To send you surveys in connection with our services.

To assist in the investigation of suspected illegal or wrongful activity, and to protect and defend our rights and property, or the rights or safety of third parties.

To develop, provide, and improve our services.

To communicate with you about any issue that you raise with us or which follows from an interaction between us.

### **What we do with the information we gather**

We will only use your personal data when the law allows us to but we require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

Internal record keeping.

We may use the information to improve our products and services.

We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.

From time to time, we may also use your information to contact you for market research purposes.

We may contact you by email, phone, fax or mail.

For processing your orders and managing and administering your account; delivering any services, products or information requested by you; responding to complaints or account enquiries.

To verify your identity when required (you may lose your password or security information for example, and we may then need to ask you for other 'identifiable' information to protect your data from unauthorised access).

Where we need to comply with a legal or regulatory obligation

### **Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

In addition, we limit access to your personal data to those employees, agents and any other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any data breaches and will notify you and the regulator of a breach where we are legally required to do so.

### **Third Parties**

We may have to share your personal data with the following third parties:

Service Providers based inside and outside the EU who provide IT and system administration services

Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.

We may also seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice

Market Research Companies

Fraud Prevention and Credit Reference Agencies to enable us to protect our rights, property, customers, or others.

Specific third parties such as BT and other Service Providers we use to provide services to you. We require all third parties to process your personal data in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Links to other websites**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

### **Controlling your personal information**

You may choose to restrict the collection or use of your personal information in the following ways: Whenever you are asked to fill in a form on the website, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes if you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at [dataprotection@fastnet.co.uk](mailto:dataprotection@fastnet.co.uk). We will not distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

### **Social media, blogs and reviews**

Any social media posts or comments you send to us will be shared under the terms of the relevant social media platform (e.g. Facebook / Twitter) on which they are written and could be made public. Fastnet have no control over these platforms and are not responsible for this kind of sharing. You should read and understand the terms and conditions and privacy policies of the social media platforms you use.

If you make a comment on any of these services they must be not offensive, insulting or defamatory. You are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

### **How long do we keep your information for?**

We only hold your information for as long as we actually need it for the purposes we asked you for it in the first place, we do this in order to meet our legal data protection and privacy obligations. Generally this means we will keep your information for as long as you continue to use our services, and for a reasonable period of time afterwards – in case we can persuade you to come back to us. This reasonable period for keeping your personal data, is determined by the amount and nature of the personal data, the potential risk of harm any unauthorised use or disclosure may cause, the purpose for which we process your personal data and whether we can achieve that purpose through other means. After this period we will delete it other than where we lawfully can keep any data for audit or legal reasons.

We will keep data on our prospect database for not longer than 3 years from receipt subject to an individual's right to unsubscribe or be forgotten at any time.

## **Your rights**

As a data subject you have rights under data protection laws and under certain circumstances Your rights are as follows:

### **Request access**

You may request a copy of the personal data we hold about you by making a data subject access request. You will not be charged for this.

### **Request Correction**

If you believe we hold inaccurate personal data you may asked for this to be corrected. We will also need to verify the new information you supply.

### **The right to be forgotten (erasure)**

When there is no legitimate or legal reason for us to be processing your personal data (including data that may have been unlawfully processed) you can ask us to delete it. We will take all reasonable steps to grant your request.

### **The right to restrict processing.**

You can ask us to stop processing your data. This is different from erasure as we will still hold the data, but processing is suspended for the following reasons:

You contest the accuracy of the personal data

Processing the data is unlawful

We no longer need the data but it is required as part of a legal process

You have exercised your right to object but we need to establish whether we have legitimate rights to use the data.

### **The right to object**

You have the right to object to the processing of your personal data if the processing is based on a legitimate interest as you believe it infringes your fundamental rights and freedoms. You can also object if you believe we are processing your data for either of the following reasons;

Scientific or historic research

Direct marketing.

### **Portability request**

You can request the transfer of your personal data to you or a third party provided in a structured commonly used machine-readable format. This right applies to automated information that you consented to provide or was used to fulfil a contractual obligation.

### **The right to withdraw consent at any time**

This will not affect the legitimacy of any processing prior to your request for withdrawal. We will advise you on receiving a request for withdrawal of consent whether we are able to continue provide the products or services contracted with you at that time.

From 25 May 2018, we shall process your personal data in accordance with the General Data Protection Regulations (or GDPR for short). If you would like a copy of the information held on you please write to Data Protection Officer, Fastnet International Limited, Shaftesbury Court, 95 Ditchling Road, Brighton, BN1 4ST.

We aim to respond to all requests within one month. However, it may take us longer than this if your request is complex or you have made various requests. In this case, we will notify you and keep you updated.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will then promptly review and correct any information found to be incorrect.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.