

Introduction

This Privacy Policy outlines how we process personal data about you, the type of personal data we collect and how we use that personal data. This Privacy Notice also informs you of your rights that are available under the data protection legislation.

Who we are

Daisy Communications Limited is registered on the Information Commissioner's Officer Register, our registration number is Z7761141. This Privacy Notice applies to Daisy Communications Limited, Spiritel Mobile Ltd, Voice Mobile Ltd, XLN Pay Ltd, XLN Energy Ltd, Communicate Better Ltd and our applicable brands as stated below:

- Daisy Communications
- XLN powered by Daisy Communications
- Onebill
- Communicate Better
- Reward Mobile
- Leased Line

If you have any questions or require further information, you can contact our compliance team or our independent Data Protection Officer (DPO) via:

Email: dataprotection@daisycomms.co.uk

Post: Lindred House, 20 Lindred Road, Nelson, Brierfield, BB9 5SR

Phone: 0800 040 8888

How we obtain and use your personal data

When you browse our website

We retain information about your computer or device, such as your IP address and browser type and your usage of our website and emails from us, as a legitimate interest for reasons of systems security and performance. We will anonymise or pseudonymise this data when being used for analytics purposes when appropriate.

Direct Marketing

We will contact you for direct marketing purposes, as our legitimate interest for business development, where you have requested further information about our services, where we have received contact details as a corporate subscriber and believe our services are relevant to your company, where you have started negotiations or entered into a contract with us and haven't opted-out ("soft opt-in") or where you have

provided consent for marketing. We use third party data providers to obtain business contact details for marketing purposes as well as information collected by our sales agents and information provided directly by customers and prospects.

You have the right to opt out of marketing at any time, which can be done by selecting unsubscribe from our emails or messages to you, or using the details provided above.

Buying or using our products and services

We will process personal data that is necessary to enter into a contract and to provide our contractually agreed services to you or your business. Where that contract is agreed directly with you, our processing will be on the basis of being necessary for that contract. Where the contract is with your business, our processing of your personal data will be on the basis of legitimate business interest, so that we can provide the services to your business.

We will process and share your personal data with suppliers involved in the management of your products and services, under contractual agreement or where necessary under law.

Processing of your data is necessary to meet, or prepare, a contract for our products and services. If adequate company and personal data is not provided or you object to the processing of your data we may not be able to provide the products and service to you and accept you as a customer.

This will also apply where you buy products and services through business partners who sell on our behalf, who operate as independent data controllers in their own right and whose own privacy notice will apply to their processing of your data and personal data acquired from organisations which we have acquired where you were previously a customer.

We ask that you do not provide us with special categories of data under GDPR, unless necessary for us to make reasonable adjustments for you for reasons of mental or physical health. We will process that data as a legal obligation under The Equality Act and to support you with equality of opportunity and treatment.

Communication

We will use your personal data to appropriately respond to your general queries or complaints as is necessary to manage your contract. Phone calls will be recorded for quality assurance and training purposes, as our legitimate business interest.

We will process your personal data to improve our processes, through analysis of communications such as call recording and improve the products and services we offer, including the use of surveys, as a legitimate business interest.

Credit agencies

We will process data about you when you sign up for our products and services to carry out credit checks using your data and data available on Companies House and public sources as our legitimate business interest to mitigate any risk.

We may also carry out further credit checks on 'high usage' and 'high risk' customers during the course of the contract using a Credit Reference Agency, as our legitimate interest to mitigate on-going risk, to assess credit worthiness and for fraud prevention. This means that your credit records will be searched, along with those of anyone who is financially associated with you such as your spouse or partner. The Credit Reference Agency will keep a record of this search and place a "footprint" on your credit file and collect and maintain information about consumers' and businesses' credit behaviour. This includes data sourced from the Electoral Register, fraud prevention, and credit information – including details of previous applications and the conduct of your accounts – and public information such as County Court Judgements, decrees, and bankruptcies.

The Credit Reference Agency, which operates as an independent data controller and whose own privacy notices apply, that we use is CreditSafe and Experian.

Compliance with legal and regulatory requirements

We will process data where we are under a legal or regulatory requirement to do so, including sharing of data with third parties. This can include regulators (Ofcom, Information Commissioner Officer, and Financial Conduct Authority), courts or law enforcement agencies.

How long we store your personal data for

Our policy is to only retain your personal data for as long as necessary. The retention period will vary depending on the purpose of processing, the products and services, the type of personal data, your relationship with us and any legal or regulatory requirement we may have.

Your rights and how to exercise them

The data protection legislation provides you with rights over the personal data we collect and process about you. These include:

- **Your right to be informed** – you have the right to be informed how your data is being processed, which is largely provided by this Privacy Notice.
- **Your right to access** – you have the right to request that we provide you with a copy of your personal data which we hold about you.
- **Your right to rectification** – you have the right to request that we update your personal data if it is inaccurate or incomplete.

- **Your right to erasure** – you have the right to request that we delete your personal data which we are holding, commonly known as the Right to be Forgotten.
- **Your right to restrict processing** – you have the right to request that we restrict the way we process your personal data.
- **Right to data portability** – you have the right to request that we provide your personal data to you or a third party in a structured, commonly used and machine-readable format.
- **Right to object to processing** – you have the right to request to object to us processing personal data.

The extent of these rights are limited by law and we may not act on some parts or all of your request(s) where the rights are not applicable. If we choose to not act on the request(s), we will provide you with an explanation. In order to submit a request or for further information, you may contact us using the details provided above.

If you are dissatisfied with our processing of your data, you have the right to raise a complaint with our business Customer Service team, our Compliance Team, our independent DPO, or the Information Commissioner Office (www.ico.org.uk). If you do have a complaint, we ask that you contact our Compliance team in the first instance using the details provided above.

Other formats

We are able to provide this Notice in large print, coloured paper, in Braille or audio upon request. To make such a request please contact us using the details provided above.

Other matters

This Privacy Policy was designed to be concise, transparent, intelligible, easily accessible and easy to read. If you have any questions, please contact us using the details provided above. We primarily process data within the UK. Where processing needs to occur outside the UK, due to system constraints, that will be subject to contractual agreement and contractual safeguards.

This Privacy Notice may be amended from time to time, as is our right. Any such change will be made available in this Notice to keep you informed about how we process your personal data. For any significant change made to the Privacy Notice, you relevant data subjects will be contacted directly via email or letter where feasible.

If you follow an internet link from our website to a partners' website or engage with other independent data controllers, their privacy notices will apply. We do not accept any responsibility or liability for those notices. Please check those notices before you submit any personal data to their websites.

