

# Telecoms Privacy Policy



This policy is to be read in conjunction with, and makes reference to the main Privacy Policy of Post Office Limited. This Telecoms Policy deals with the data processing activities that are specific to telecoms and related services only.

## What information we collect about you, and why

The information we collect about you will vary depending on the purposes of the processing, in other words, the Services that we are providing to and for you, and what you have agreed to.

If you agree to further processing of your data for different purposes, in addition to the Broadband and Phone Service, we may need to seek your further permission to process some, or all of this data for these different purposes. The way that we ask for permission from you for these additional Services is either via 'Consent' or 'Performance of a Contract'. Gathering permission from you using 'Consent', gives you more rights, and these rights are detailed in the main Privacy Policy of Post Office Limited. Post Office Limited will additionally have to process some or all of your data without your permission, and this is where we have a legal obligation to do so, or we have a legitimate interest in doing so.

Where you give us permission by way of 'Consent' to process your data for specific reasons, you have a real choice about how long these permissions last. At any time, you can ask us to stop processing your data for that purpose by withdrawing your 'Consent'. Furthermore, as we want to make sure the data we process is accurate and reflects your most up to date choices, we will 'refresh' your permission, unless of course you ask us not to.

## Where we collect your data from

Most of the information you provide directly to us yourself, or by a person you have nominated to provide the information on your behalf. We also collect other pieces of information which can be regarded as observed, that is data we capture as part of providing you the service, for example, location data provided when you use the internet. Additionally, we collect, derive or infer some of your data from 3rd

parties, for example, during a credit check when you sign up for our Services.

We sometimes capture data which does not relate to you, but to other people. This is people that you allow to connect to your router, for example family and friends. It can also be details of people you have communicated with, such as the telephone number of the person you are calling, or the email addresses of people you receive emails from. This is not an exhaustive list, but gives you examples of the circumstances in which we are collecting data that belongs to other people. Where we capture this data about other people, it is your responsibility to ensure you have their permission to provide us with their data, and you should ensure that these people are aware of our Privacy Policy.

## The Purposes:

### *Broadband and Phone*

To provide Broadband and Phone services, including billing, we collect the list of data detailed under 'Categories of Personal Data'. You give us permission to collect and process all or some of this data by agreeing to a contract between us. The 'Performance of a Contract' is the basis we use to process your data. Additionally, if we need to investigate a fault, as part of providing this service to you, and you give us additional information, you will be giving your 'consent' to processing this additional information for these purposes. See also 'legal obligations' placed upon us when providing this service to you.

### *Email*

Some of our legacy Broadband Services can additionally provide you with email Services. This is to allow you to send and receive emails, as well as store them. For the provision of these Services (sending, receiving, and storing them), we ask your permission by way of 'Consent'. Additionally, the content of emails can contain sensitive information, we call this 'Special Category Data'. For this type of processing, we need to be very sure you understand what you are consenting to. We do this by obtaining your 'Explicit Consent'. We assume that you are giving 'Explicit Consent' by the affirmative actions you perform, by accessing your email account, and sending and receiving emails. You withdraw your 'Consent' by deleting these emails. For this service, we collect some

or all of the data listed under 'Categories of Personal Data' excluding 'Invoicing Data'.

#### *Voicemail*

Post Office Limited can provide the additional service of Voicemail. The transmission of the Voicemail itself is covered under the Broadband and Phone Service. The storage of Voicemail requires your permission by way of 'Consent'. You give your Consent by setting up your Voicemail box, and accessing your Voicemail. We also understand that sometimes Voicemail messages may contain sensitive data, and for this reason, we need to be very sure that you know what you are giving your 'Consent' for. This requires us to gather a further permission from you, called 'Explicit Consent', and we assume this is given by the affirmative actions of you setting up your Voicemail box, and accessing those messages on your Voicemail box. You can withdraw this 'Explicit Consent' by deleting those Voicemail recordings at any time, or removing the voicemail from your Service. The Voicemail recordings that are stored in your Voicemail box can include your voice, usually this is your greeting message, as well as a recording of the person that has left that message. By allowing the message to be left, you are ensuring that you have that person's permission to store that message.

For this service, we process some or all of the data listed under 'Categories of Personal Data'

#### *Anti-virus software*

Post Office Limited can additionally provide you with anti-virus software. This is an application which you download from our 'Secure Online Service' yourself. The basis we use to process your data is by 'Performance of a Contract'. For this purpose, we need to process your customer reference number, and a licence key code.

#### *Marketing*

Using your permission ('consent')

For the additional purpose of marketing, we will process some or all of the information under 'Categories of Personal Data' depending on exactly what choices you have made in relation to marketing.

#### *Using a permission of 'legitimate interests'*

To send you marketing materials where we can demonstrate a relationship with you and you have not told us that you do not want to receive these, we will process some or all of the information under "Categories of Personal Data" excluding the category of "Telecommunications Data".

*Legal obligations which Post Office Limited must adhere to on request*

For the purposes of meeting different legal obligations under UK law, Post Office Limited, if instructed to do so, must process all, or some of the data under 'Categories of Personal Data' for the period defined in the different laws. For example:

1. To confirm the accuracy of your charges and billing, as required under telecommunication law.
2. To ensure that persons with disabilities are able to receive Services in accordance with the requirement under the telecommunications law, for example to receive contracts and bills in the correct format. This obligation requires the Post Office to capture the health data necessary to inform us when we will need to meet this obligation.
3. In the interests of national security, preventing and detecting crime and other reasons as required under the Investigatory Powers Act 2016, as well as any other laws requiring us to retain your data.

For this purpose, we don't ask for your permission, as we rely on the lawful basis of 'Legal Obligation' placed upon Post Office Limited (as the Controller of your data).

#### *Legal obligation which Post Office Limited must adhere for invoicing, accounting and audit*

Post Office Limited must retain your personal data for VAT, taxation, finance and accounting, and audit purposes. The detail we must retain is detailed under 'Categories of Personal Data' (excluding 'Telecommunications Data and Content Data').

For this purpose, we don't ask for your permission, as we rely on the legal obligation placed upon the Post Office Limited (as the Controller of your data). Some of this invoicing data is needed for wholesale billing, which is to pay our suppliers, in addition to billing you.

#### *Credit management and referencing*

In order to process your application for Broadband and Phone Service, we will share your personal data with Credit Reference Agencies, Fraud Protection Agencies, and Debt Collection Agencies, and they will provide us with information about you, including analysis of your financial history. We need to do this to assess your creditworthiness, check your identity to confirm you are who you say you are, and assess whether you can afford to pay for the Services you have applied for, as well as ongoing management of your account, prevention of criminal activity, and enabling us to trace and recover debts. When performing these initial checks, we use the permission of 'entering into and performance of a contract' to process your data.

Where we share your information on a continuous basis with some or all of these agencies during the period you have a relationship with us, including details about your account with us, for example, if your account has any debts that are not fully repaid, as well as details of paying your bills on time, the permission we use for processing for this purpose is 'Legitimate Interest' as we too have to fulfil our contractual obligations with these agencies of sharing some of your data, in return for them providing us with the initial check information.

When we ask these agencies for information about you, they will place a search footprint on your credit file that may be seen by other organisations. These agencies will also be linked with information about your spouse or partner, or any financial associate. Before applying for our Services, you must ensure that you also have your spouse/partner/financial associate's permission to share their data.

For these purposes we will process some or all data under "Categories of Personal Data", excluding "telecommunications data" and "content data"

#### *Management Information for Risk Analysis*

The Post Office Ltd, has a legitimate interest in processing some or all of the data under "Categories of Personal Data" ('telecommunications data', 'content data', and 'sensitive data – special category data') for risk analysis to help with decisions around lending responsibly. To process your data for these purposes, we use the lawful basis of 'Legitimate Interest'

## **Categories of Personal Data**

When we provide the Services above, we collect different categories of personal data, these are:

#### *Data for contacting you:*

Name, title, address, previous address, telephone number, alternative telephone number such as mobile, email address, a nominated person's name, address, telephone number, email address (where you require third party bill management).

#### *Data about you:*

Date of birth, how long you have lived at your address, gender, your credit check details including CCJ's, details of bankruptcy, your credit score, customer reference number, discount code, your preferences and choices regarding the Services you have chosen from us, and your preferences regarding if you would like us to contact you about other Services and offers, any details about your well-fare, including your health, where we need to ask this information in order to prioritise fault restoration as required under the telecommunications law.

#### *Data about your account, including maintaining your account with us*

Bank details, including those used for direct debits; bank account number, sort code, account name, bank name, payment card details (held for audit purposes) only if a transaction has been carried out

Details of and on your bills; data of the bill, bill/invoice number, the amount of the bill, the due date for payment, the date you made payment, debit and credit card details (held for audit purposes, only if a transaction has been carried out), unpaid bills, whether a debt collection agency has been engaged for arrears of payments, payment plans, disputed bills, and preferences regarding your bill format, such as large print, braille, and whether you have chosen to have itemised bills, receive your bills online or by post, as well as sending of the bill to a different address to the one you live. Details of nominated friends and family (Loved Ones) including the name you assign and their telephone number, your preferences for accessing specific websites, and anti-virus licence key. We also process details of equipment, such as wireless routers we have provided to you for the Services you have agreed to.

Details of maintenance; that is if you report a fault with our Service or equipment, we will capture enough information about what that fault is, to allow us to investigate it, and put it right. This might include information about what is stored or in your terminal equipment (computer/phone/lpad for example), what type of device you are using, what browser you are using, any hardware or software, as well as any other information you give us. Of course, if you provide us with this information, then you will be giving your Consent to process this information to help you with any faults.

A recorded message if you call us, or we call you, for any reason at all, including the date and time of when you called us, or any other correspondence and communication with us, including emails and letters, as well as enquiries in our branches.

Your user name, and information used to identify you before disclosing any personal data with you.

#### *Invoicing data*

Name, customer reference number, address, telephone number, email address, details of the Services we are providing to you as detailed on your bill, date of invoice, invoice number, date of collection of payment, method of payment including your bank details for direct debiting, amount and rate of VAT, summary of Services you have bought with us, bill frequency, whether the bill is paid or not, method we send the bill to you; (email, access online, post), and type of bill for example, braille or large print. Some of this invoicing data is needed for wholesale billing that is to pay our suppliers, in addition to billing you.

## *Telecommunications data*

The telephone numbers that you receive calls or messages from, and the telephone numbers you send messages to, or make calls to.

The date, time and duration of any call, and whether this call is within a Call Plan, that is an all-inclusive call.

The price of the call, as well as any discounts and offers applicable.

Your browsing information, that is the websites that you have visited, the date and time you visited the website, and the length of time you were browsing the internet, your consumption (downloads & uploads in megabytes), router details, SSID's, and the names and descriptions of devices that have or are connected to your router, as well as the MAC address of each device and WIFI password. This also includes IP addresses, which can tell us your **location** when you connect, or attempt to connect to the internet and send/receive emails.

**Location data** - In order that we can connect you to our network so that you can make calls, send messages, and surf the internet, we need to know your location, and we work this out by combining details from your devices, with information from your router, and the network.

## *Content data*

Content of your communication is what you write or attach in an email, or any form of electronic message you send or receive via our Services, including but not limited to pictures, attachments, photos, and voicemail.

We have no control over your content in your communications, or when or where your content is sent or received, or how long you would like us to retain this for you (subject to any legal obligations placed upon us). We are however processing your content on your behalf, and we do not use this data for our own purposes.

This category of data excludes content necessary for managing your account, see category 'Data about your account, including maintaining your account with us', which has a different purpose and retention period.

## *Sensitive data – special category data*

To enable Post Office Limited to meet its legal obligations under the telecommunications law, of providing the Services suitable for you, taking into consideration any disabilities you may have, we may need to collect some sensitive data to allow us to do this. This could be data regarding your health, including whether you need to receive large print bills, braille bills, and other communications in this format too, to assist with any visual impairment, or require a service to assist with a hearing

impediment. If you do not provide this information, we will not be able to fulfil this obligation, and you may not be able to communicate effectively, as well as not receiving the correct format bill.

If you communicate any sensitive personal data, which is called 'Special Category Data' under the new privacy laws, in your communications you send and receive via our Services, although we have no control over this content, if we process this data on your behalf, we will only do this with your Consent.

## **Retention Periods**

### *Broadband and Phone*

For this purpose we retain your data to allow us to deliver this Service and for the period needed to allow any bills to be lawfully disputed. Post Office Limited allows this period to be up to a maximum of 7 years.

**Content** - We have no control over your content in your communications ('Content data') or when or where your content is sent or received. We are however processing your content on your behalf. We do not use this data for our own purposes, and you have control over sending this content and deleting this content. We retain this content for as long as you want us to retain it on your behalf, or in accordance with any Terms and Conditions. When you delete your emails and voice messages, we also delete all the places they are stored and this process can take a maximum of 51 days for email, and 60 days for Voicemail.

### *Email*

For this purpose we retain your data to allow you to send and receive emails. This is the transmission of, or to facilitate the transmission of your email, and is the period from you sending the email, to the point that it is received by the receiving party and vice versa. This period is not normally more than 1 week.

In addition, see retention under 'Content' for the communication within the emails you send and receive under Broadband and Phone.

### *Voicemail*

For this purpose of transmission of the Voicemail, we retain this data for the period covered under Broadband and Phone. However, for the content of your Voicemails, which has a different retention period, please see 'Content under the Broadband and Phone retention. The maximum retention period of 60 days.

### *Anti-virus software*

For this purpose, we retain your data during the period that you have subscribed to the anti-virus service. If you withdraw your consent for

processing your data, then we will not be able to provide you with this application.

### *Marketing*

For the purpose of marketing, for which you have specified your preferences and given your permission, we retain some or all of the data detailed in 'categories of data' depending on your choices. We retain this for the duration of the contract with us, or until you tell us you no longer want us to process your data for this purpose. Always, you are in control for this purpose, and you can just tell us to stop at any time.

If we are relying on Legitimate Interest for marketing, we will retain your data for as long as you have a relationship with us, or until you tell us to stop.

### *Legal Obligations which Post Office Limited must adhere to on request*

For the purposes of meeting legal obligations under UK law, Post Office Limited, if instructed to do so, must retain your data for the periods defined in the different laws, as and when a request is made. This might for example be to confirm the accuracy of billing to OFCOM (the telecommunications regulator), or to help fight crime and fraud. The retention period can vary according to specific instructions under the law, at the time the instruction is given.

### *Legal obligation which Post Office Limited must adhere for invoicing and accounting*

For purposes of invoicing, VAT, taxation, accounting and auditing obligations, we retain your invoice data for a period of 7 years as required under UK law..

### *Credit Referencing*

For the purposes of using and sharing data with 3rd party credit referencing, fraud protection agencies and debt collection agencies, we retain this data from the period you apply for our services, during the period you are supplied with our services, and up to 3 months after all monies owed to us have been paid, or until the debt has been sold to a debt collection agency.

Where your application is rejected based on information from these agencies, your personal data will be retained for a maximum of 3 months from the date of your application.

### *Management Information*

Personal data used for these purposes will be retained for a maximum of 13 months.

## **Who we share your data with**

We use a number of service providers to help us deliver our Services to you, this includes for example, telecom network operators who provide the infrastructure, payment Services organisations to allow us to process payments, and credit and fraud detection agencies. We are also obliged to share your data with regulatory authorities, such as OFCOM, HMRC, and law enforcement authorities when requested.

Some of these providers have obligations of their own in terms of processing your data that we provide to them directly, or they can also derive some data from other sources, such as credit scoring agencies. In combination with reading our Privacy Policy, you should also read their Privacy Policy, to ensure you are fully aware of how and why your data is being processed with them.

These providers, or categories of providers, whose privacy policies, where applicable, should be read in conjunction with our policy are.

- TalkTalk Wholesale for providing the fixed line and broadband part of the Services, for providing transmission of the communication (the network infrastructure).
- BT Wholesale for providing the fixed line and broadband part of the Services that cannot be delivered by TalkTalk
- Openreach – for network maintenance and fault repair ([www.openreach.co.uk](http://www.openreach.co.uk))
- Experian, a Credit Reference Agency, for checking your credit history when you apply for our Services, as well as details about your account and how you manage it, including recording outstanding debts ([www.experian.co.uk](http://www.experian.co.uk)), please see section on “Credit Reference Agencies” In addition, we are required to provide the following link - <http://www.experian.co.uk/crain/index.html#question1> which gives more details about how the Credit Reference Agencies process your data.
- OFCOM [www.Ofcom.org.uk](http://www.Ofcom.org.uk) the telecoms regulator who may request your data under a legal obligation
- Mastercard payment services ([www.mastercard.com](http://www.mastercard.com)) for processing card payments
- Banking organisations for processing your payments
- Talkingtech –([www.talkingtech.com](http://www.talkingtech.com)) provision of automated payments or changes to products via a telephone line.
- JC International Acquisitions Ltd– debt collection agency [www.CARS.co.uk](http://www.CARS.co.uk)
- UK Government [www.gov.uk](http://www.gov.uk) for dealing with taxation investigations
- Law enforcement or regulatory authorities, courts, or public authorities, if we are required to share by law
- Information Commissioners Office – [www.ICO.gov](http://www.ICO.gov).

uk if there is an investigation of any nature.

- Emergency services, if you call them, including giving details of your location, where we have this information.

Other service providers, or categories of service providers that we use to process your data on our behalf, will be under our instruction only.

- Fujitsu UK – for managing the Service to you on our behalf
- Martin Dawes Systems Ltd – for providing billing and customer service management
- Hinduja Global Solutions UK – for providing call centre support for customers
- X-On – provider of call recordings
- OTM – provider used for printing your bills and letters
- Strategic Imperatives – for resolving faults on your home phone
- Clicketal – providing outbound text services for provision of Services as well as fault management
- QUBE GB ([www.Qubegb.com](http://www.Qubegb.com)) engineers to support and resolve faults at your property
- Nominated third party to deal with your affairs (an obligation in law for us to do this)
- Netlink – distributor of routers
- Phixflow – [www.phixflow.com](http://www.phixflow.com) – part of wholesale billing solutions which involves your telecom data

## Using and analysing your information

The provision of Telecom Services enables you to communicate electronically every day, when you want, and in various ways, including emails, voice calls, electronic messages, and indeed from various locations, as well as browsing the Internet.

Telecommunication Services can be regarded as a way of life, and as part of providing you with this service, we capture a range of information, some of which is for legal obligations, and other pieces of information are to allow us to provide the service to you.

The analysis we do, can, for example, help inform us about which parts of the Services you use most frequently, how you use these Services, and generally make conclusions about your preferences and behaviour. Some parts of the analysing, and monitoring of your telecom usage (telecom data), we have to do as part of providing you this Service, for example, we monitor your usage, and do our best to alert you, if we feel that your usage is unusual or excessively high compared to your historical usage and bills, which we already know about you. We do this, where possible, to avoid the consequences of a large bill which you might not expect. In other words, helping you keep control of your costs. We also use analysis from your financial history, to allow us to make

a decision on whether to enter into a contract with you in order to supply our Services to you.

Not all areas of analysis are essential to the Service we provide, but could help us to provide you a better service, or indeed more offers and services. Some of this analytical and monitoring activity involves permission granted by way of a 'Legal Obligation', that is we have an obligation to get your bill right. If we require your permission, by way of 'Consent', of course, to inform you of your rights again, you can just withdraw that 'Consent' at any time, and we will stop doing this.

## Where your data is processed

Post Office Limited processes your data within the EEA only.