



NGN COMMUNICATIONS LTD

Privacy Policy



AIM

The aim of this policy is to provide you with information about:

- What information we collect from you and why;
- How we use this information; and
- How you can access and manage your information

We are committed to protecting and preserving your information, being transparent about what data we hold and how we use it.

SCOPE

This policy applies to anyone who uses the websites of, or who buys or uses any of the services provided by NGN Communications Ltd.

When we refer to “we” or “our” we are referring to NGN Communications Ltd, as the context requires.

OVERVIEW

We collect information about you when you buy or use any of our services including services which have transferred to us when we have bought another business, or from other organisations such as credit agencies or other organisations we use to provide services to you, for example Creditsafe. We may share this information between us so we can provide the services you order and manage your account.

By using any of our services or visiting our websites you agree to our use of your information as set out in this privacy policy. This privacy policy forms part of and should be read in conjunction with the terms and conditions on our websites and any additional terms you are provided with in relation to our services.



INFORMATION WE COLLECT

1.) Information you give us

When you place an order with us for any of our services we will need certain information to process your order. This may be information such as your name, private/business email or postal address, telephone or mobile number, date of birth, financial or banking information to help us identify you and to provide a service to you. We may ask for other information that relates to the service you are using or ordering.

When you contact us to discuss your services, we may ask for certain information to be able to confirm your identity, check our records and answer your questions quickly and accurately.

If you complete any survey or enter any competitions we may ask for information about you, which we will make clear to you at the time and for the purpose we will be using this information.

2.) Information we automatically collect

We will automatically collect information: when you use our services, such as the amount of time you spend online, the channels and programmes you watch and record, the websites you visit, or when you make a call the number, destination and length of your call, which we need to help manage our network and for billing purposes; and

when you visit our websites, or use our mobile applications, we may collect and process information about your usage of these by using “cookies” and other similar technologies (see Cookies section below) to help us make improvements to the websites and to the services we make available.

When you download, or use mobile applications created by us and, where applicable, have requested or consented to location services, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as search results, and other personalised content. Most mobile devices allow you to turn off location services. Our mobile application does not collect precise information about the location of your mobile device.

3.) Information we receive from other sources.

We may receive personal information about you from third parties, such as companies contracted by us to provide services to you, other telecommunications operators, marketing organisations, and credit reference agencies (CRAs) or fraud prevention agencies (FPAs) – see credit checks section below



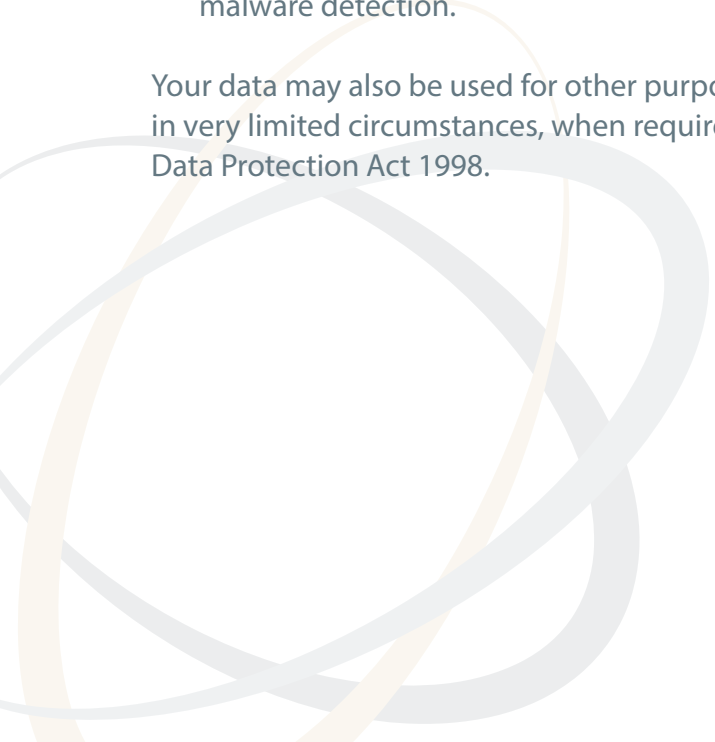
HOW WE USE INFORMATION

The information we collect helps us to better understand what you need from us and to improve the provision of our services to you.

We use the information collected for example to:

- verify your identity when you use our services or contact us;
- process your enquiries, orders or applications, for example when assessing an application, we may use automated decision making systems and to provide your services;
- carry out credit checks and to manage your accounts - see credit checks section below.
- monitor, record, store and use any telephone, e-mail or other electronic communications with you for training purposes, so that we can check any instructions given to us and to improve the quality of our customer service, and to meet our legal and regulatory obligations.
- where you have agreed, provide you with information about other NGN Communications services, offers or products which you may be interested in - Marketing Preferences section below.
- tell you about changes to our websites, services or terms and conditions.
- carry out any marketing analysis, profiling or create statistical or testing information to help us personalise the services we offer you and to understand what our customers want.
- recover any monies you may owe to us for using our services.
- analyse our services with the aim of improving them.
- prevent or detect a crime, fraud or misuse of, or damage to our network, and to investigate where we believe any of these have occurred; and
- monitor network traffic from time to time for the purposes of backup and problem solving, for example our automated system may monitor email subjects to help with spam and malware detection.

Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law or where permitted under the terms of the Data Protection Act 1998.





CREDIT CHECKS


When you apply to buy products and services from us we may carry out a credit check. This means we may need to check certain records about you, these may include:

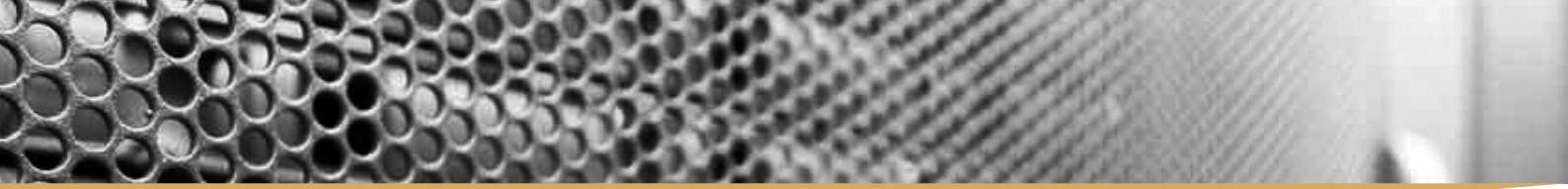
- our own records;
- records at CRAs. Information on applications for our products and services will be sent to CRAs. When CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other organisations. They supply to us both public (including the electoral register) and shared credit and fraud prevention information. If you tell us about a spouse or financial associate, we will link your records together. CRAs also link your records together, and these searches will be recorded by CRAs. We may disclose information about how you run your accounts to the CRAs;
- records at FPAs. We and other organisations may access and use from other countries the information recorded by FPAs; or
- If you are a director of an organisation, we will seek confirmation, from CRAs, that the residential address that you provide is the same as that shown on the restricted register of directors' usual addresses at Companies House.

It is important that you give us accurate information. If you give us false or inaccurate data and we suspect fraud, we will record this with the FPAs.

SHARING INFORMATION

We will only share your information with organisations outside NGN Communications:

- with your consent if we are using information for a purpose other than as set out in this Privacy Policy;
 - involved in the running or managing of your accounts or providing services to you for us (e.g. customer support, or a courier company if you have asked us to send something to you);
 - to help us improve the services we are providing;
 - as part of the process of selling one or more of our businesses;
 - as part of current or future legal proceedings;
 - in response to properly made requests from law enforcement agencies for the prevention and detection of a crime, for safeguarding national security; or when the law requires us to, such as in response to a court order, or other lawful demand or powers contained in legislation; or
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- in response to properly made requests from regulatory bodies such as the Information Commissioners Office and Ofcom, for example where you contact Ofcom asking them to investigate a complaint in respect of the provision of our services to you, they may request information from us to enable them to investigate and decide in respect of this matter. We will need to provide them with the relevant information we hold relating to your account.

Where we share your information with third parties they are required to follow our express instructions in respect of the use of your personal information and they must comply with the requirements of the Data Protection Act 1998 or any other relevant legislation to protect your information and keep it secure.

From time to time these other people and organisations may be outside the European Economic Area in countries that do not always have the same standard of data protection laws as the UK. However, we will have a contract in place to ensure that your information is adequately protected and we will remain bound by our obligations under the Data Protection Act 1998 even when your personal information is processed outside the European Economic Area.

HOW LONG DO WE HOLD YOUR INFORMATION?

The time for which we keep information varies according to what the information is used for. Unless there is a specific legal requirement for us to keep information, we will keep your information for as long as it is relevant and useful for the purpose for which it was collected (and which you agreed to).

For example, when you contact us we may monitor and record your communications with us to use this information for training and quality purposes, and to meet our legal and regulatory requirements. Where we record calls, these call recordings are only held for a limited period before we delete them permanently.

We will continue to hold information about you if you do not become our customer, your application is declined, or after you have closed your account or terminated your services with us. We will only hold such information for such periods as is necessary for the purpose of dealing with enquiries, offering NGN Communications products and services you may be interested in, complying with any legal obligation and for crime and fraud prevention and detection.

The law requires us to keep certain information about how you use our services for a period of 12 months. This information may be used by certain law enforcement agencies to prevent and detect crime and to protect national security. We will only disclose this information to them when we are legally required to.



ACCESSING YOUR INFORMATION

The Data Protection Act 1998 entitles you find out what information we hold about you. If you want to find out what information we hold you will need to submit a request in writing to/o The Data Controller, NGN Communications, Building 3 NLBP, Oakleigh Road South, London, N11 1GN together with a cheque for £10 (to cover our costs of processing the information) made payable to NGN Communications Ltd.

We may ask you to provide us with proof of your identity to make sure we are giving your information to the right person.

To help us process your request you will need to provide the following information:

- account number(s);
- telephone number(s);
- address; and
- date and time (if requesting a call recording).

If any of your information is incorrect or your personal details have changed you can either:

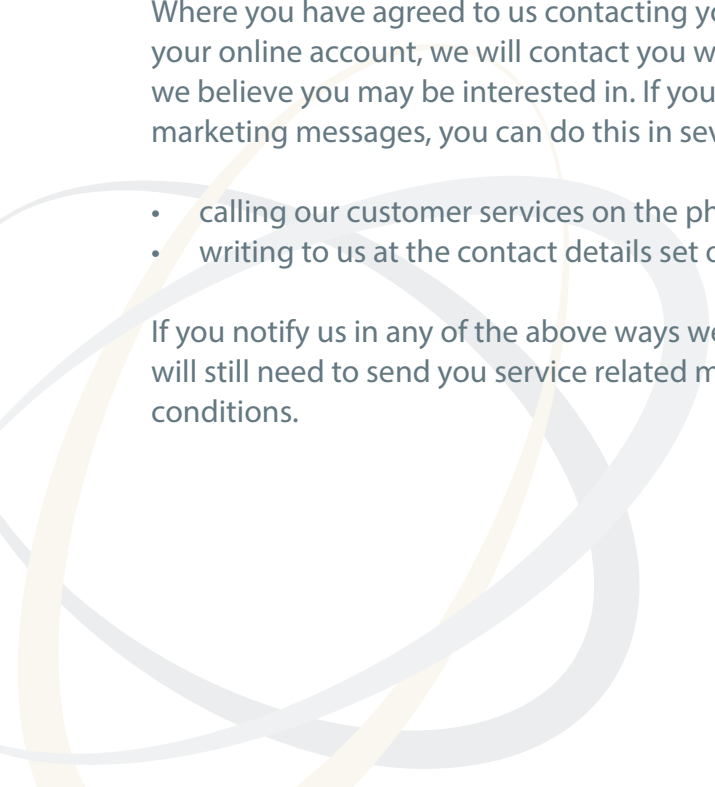
- notify us in writing, and we will update your details; or
- update your details within your online account.

MARKETING PREFERENCES

Where you have agreed to us contacting you either when you joined or via your preferences on your online account, we will contact you with details of products, services and special offers that we believe you may be interested in. If you change your mind and do not want to us to send you marketing messages, you can do this in several ways:

- calling our customer services on the phone number set out in the Contact Us section below.
- writing to us at the contact details set out in the Contact Us section below.

If you notify us in any of the above ways we will stop sending you marketing messages, but we will still need to send you service related messages including changes to services or terms and conditions.





COOKIES

Our websites and mobile application may use cookies. Cookies collect information about your use of our website and any of our mobile applications you download, including things like your connection speed, details of your operating system, the time and duration of your visit and your IP address. The information collected by cookies enables us to understand the use of our site, including the number of visitors we have, the pages viewed per session, time exposed to particular pages etc. This in turn helps us to provide you with a better experience, since we can evaluate the level of interest in the content of our website and tailor it accordingly. We will not attempt to personally identify you from your IP address unless required to as a matter of law or regulation or to protect our or our other customers' rights.

Most browsers automatically accept cookies. You can set your browser options so that you will not receive cookies and you can also delete existing cookies from your browser. However, you may find that some parts of the site will not function properly if you disable cookies.

PROTECTING YOUR INFORMATION

We take protecting your data seriously, and will do our utmost to employ appropriate organisational and technical security measures to protect yours against unauthorised disclosure or processing.

Unfortunately, we cannot guarantee the security of transmitting information via the internet. We have tried to create a secure and reliable website and mobile application for our users. However, we have no responsibility or liability for the security of personal information transmitted via the internet.



CHANGES TO PRIVACY POLICY

Please note that this policy will be reviewed and may change from time to time. The revised policy will be posted to this page so that you are always aware of the information we collect, how we use it and under what circumstances we disclose it.



CONTACT US

If you feel we have breached your privacy, want us to update your marketing preferences, or amend your information, please contact us either:

In writing at:

NGN Communications Ltd
Building 3 NLBP
Oakleigh Road South
London
N11 1GN

By phone at:

0330 333 4780

By email at:

experience@ngncomms.com





NGN Communications
PASSION FOR INNOVATION

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Call Now
0333 222 5999
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