

# Telecommunications Privacy Policy

Midshire Business Systems (Communications) Ltd

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# 1 Purpose

The purpose of this policy is to provide you with information about the following:

- What information we collect from you and why;
- How we use the information; and
- How you can access and manage your information.
- Support compliance with legal and regulatory requirements, but not limited to General Data Protection Regulation (**REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016**) and the Directive on privacy and electronic communications (**Directive 2002/58/EC**) and the **E-Privacy regulation** when implemented; and
- Ensure that the confidentiality and privacy of individuals is protected as required by relevant legislation, regulations, and, if applicable, contractual clauses.

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

This Privacy Policy replaces all other versions and was updated in May 2018.

## 2 Who we are?

Midshire Business Systems (Communications) Ltd and LegalTX a trading name of Midshire Business Systems (Communications) Ltd. For the purposes of Data Protection, Midshire is the 'Controller' of the information you provide to us. Our Head Office is located at Midshire House, Doranda Way, West Bromwich, B71 4LT

## 3 Policy

### 3.1 General

All personal and sensitive personal data processing across Midshire will be conducted in a manner that is compliant with the GDPR. Taking into account the following principles:

- Lawfulness, fairness and transparency;
- Purpose limitation;
- Data minimisation;
- Accuracy;
- Storage limitation;
- Integrity and confidentiality;
- Rights of individuals (including but not limited to the right to be informed, access, erasure, rectification, portability, restriction, objection and rights relating to automated decision making);
- Accountability.

## 3.2 Information we collect

### a. 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 and financial 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 website enquiry or contact us form 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.

### b. Information we automatically collect

When you visit our website or 'Click' on any marketing correspondence, we may collect and process information about your usage of these channels by using "cookies" (see Cookies Policy) to help us make improvements to the websites and to the services we make available.

### c. Information we receive from outside 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 rating agencies (CRAs).

## 3.3 How do we use your personal data

The information we hold on you 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 and provision service orders; examples include:
  - To provide the products and/or services to you;
  - To communicate with you in relation to the provision of the contracted products and services;
  - To provide you with administrative support such as account creation, security, and responding to issues and taking payments.
- Carry out credit checks and to manage your accounts
- 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 in order to meet our legal and regulatory obligations;
- 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;

### Legitimate Interests: Where this is necessary for purposes of our own, or third party legitimate interest.

- Required by law to respond to request by government or law enforcement authorities, or for the prevention of crime or fraud.
- Advise customers of service delivery issues and provide advice against telephony fraud prevention.
- Direct Marketing – providing you with newsletters, surveys, information about events, offers and promotions, related to products which may be of interest to you;
- Performing analytics on sales/marketing data, determining the effectiveness of marketing campaigns and using this data for feedback.

We may contact you by email, phone or postal mail, unless you have opted for us not to do so.

You have the right to opt out and unsubscribe from the processing of your personal data on the basis of legitimate interest and direct marketing, as set out below, under the heading Your Rights.

### 3.4 How do we share your personal data

We may share your personal data with trusted third parties including:

- Service providers contracted to us in connection with provision of the products and services
- Analytics and search engine providers that assist us in the improvement and optimisation of our Website.
- Legal and other professional advisers, consultants, and professional experts;
- Our staff: Your personal data will be accessed by our staff but only where this is necessary for their job role.
- Partners: For the purpose of answering queries you have about products and services not directly provided by Midshire.

- Sister Company: We share information with our sister company Midshire Business Systems Ltd, who provide photocopier and IT services to our customers.
- Delivery companies: To deliver products that you have ordered from us.
- Credit reference agencies: So that we can verify your identity, and to provide information on missed or late payments or other activity which may affect your credit score.
- Other service providers and advisors: Such as companies that support our IT, help us analyse the data we hold, process payments, send communications to our customers, provide us with legal or financial advice and help us deliver our services to you.
- The government or our regulators: Where we are required to do so by law or to assist with their investigations or initiatives, including the Information Commissioner's Office.
- Police and law enforcement: To assist with investigation and prevention of crime.

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

Where a third party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data with law enforcement or other authorities if required by applicable law.

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. Data protection and data handling training and guidance is provided to all employees when starting employment at Midshire Business Systems (Communications) Ltd and annually as refresher training. We also limit access to your personal data to those who have a genuine business need to know it.

### 3.5 How long we will keep your personal data

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

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 Midshire products and services you may be interested in, complying with any legal obligation and for crime and fraud prevention and detection.

### 3.6 Your Rights

#### Right to Access

You have the right to request a copy of the personal data that we hold by contacting us at the email or postal address given below.

To help us to 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)

We will respond within 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information, or if your request is manifestly unfounded or excessive.

### **Right to rectification**

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

### **Right to erasure**

You have the right to request the deletion of your personal data where, for example, the personal data is no longer necessary for the purposes for which it's collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

### **Right to restrict processing**

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please get in contact.