



Claranet Privacy Policy

January 2023

1. Who are we?

Claranet Limited of 110 High Holborn, London, England, WC1V 6JS and its group of companies (www.claranet.com) (“we”, “Claranet”) are committed to protecting and respecting your privacy.

For the purpose of applicable data protection legislation, the data controller of your personal information is the Claranet group company(ies) you have contracted with and/or to whom you have granted consent.

2. What does this Privacy Policy do?

- a) Claranet has developed this privacy policy because we want you to feel confident about the privacy and security of your personal information. Claranet takes all reasonable care to prevent any unauthorised access to your personal information.
- b) When we refer to “personal information” in this privacy policy, we mean information that relates to you in circumstances where we can identify you directly or indirectly. We may hold and use personal information about you in your capacity as a consumer, as a business customer or business supplier, or generally as an individual when you visit our websites.
- c) This privacy policy only applies to how Claranet deals with your personal information. It does not apply to your use of services, products or websites made available to you by third parties, even if you access them through Claranet. Please review the applicable privacy policies of such third parties to understand how they use your personal information.

3. Why we collect personal information about you and how do we use it?

We may collect and process the following personal information about you:

- a) Personal information that you provide by filling in forms on Claranet provided portals and on our website www.claranet.co.uk/ (“our site”) or Claranet Affiliate websites and portals where applicable. This includes personal information provided at the time of subscribing to our services, posting material or requesting further services such as your name, email address, phone number, organisation you work for and job title. We may also ask you for personal information when you report a problem with our site.
- b) We use this information to provide the services to you that you have requested and which we have agreed to provide to you.
 - Our lawful ground for processing your personal information for this purpose is that our processing is necessary to deliver our services to you, it is necessary for the performance of a contract.
- c) We also collect personal information about your use of our services (such as the amount of time you spend on-line), which we use to manage our network, and for billing purposes.
 - Our lawful ground for processing your personal information for these purposes is that our processing is in our legitimate business interests to provide access to our services and network in a secure and effective way and manage our billing.

- d) We may ask you from time to time about what use you make of the services we provide, what other services you would like us to provide in the future, and other personal information, such as lifestyle data.
- Our lawful ground for processing your personal information for these purposes is that it is in our legitimate business interests, so that we can improve our services and provide them in an effective way.
- e) Insight, analysis and retargeting through Cookies: We collect personal information about your use of our site and services (for example, certain data relating to your browsing activity or interaction with our emails, obtained through the use of cookies, pixel tags and other similar technologies; information about when your current or previous sessions started; details about any products or services you viewed or purchased through the site (“Behavioural Data”) and/or data such as you IP address; browser type and operating system; geolocation, to ensure we’re showing you the correct notices and information; any other unique numbers assigned to a device (“Technical Data”). We and our third-party partners use this data to analyse how you use our site and our products and services and the effectiveness of our site and our products and services, including:
- for the purposes described in the Marketing and Advertising Section below;
 - to help us to make improvements to our sites and to the services we make available to our customers and users;
 - to count users who have visited our site or opened an email and collect other types of information, including insights about visitor browsing habits, which helps us to improve our site, our products and services and the effectiveness of our emails;
 - to measure the effectiveness of our content;
 - to learn what parts of our site are most attractive to our users, which parts of our site are the most interesting and what kind of features and functionalities our visitors like to see;
 - to help us understand the type of marketing content that is most likely to appeal to our visitors and customers; and
 - to help us with the selection of future product and service lines, website design and to remember your preferences.
 - Our lawful ground for processing your personal information for these purposes is that it is in our legitimate business interests, so that we can improve our sites and services and provide them in an effective way.
- f) In some of our email messages, we use a “click-through URL” linked to certain websites administered by us or on our behalf. We may track click-through data to assist in determining interest in particular topics and measure the effectiveness of these communications.
- Our lawful ground for processing your personal information for these purposes is that it is in our legitimate business interests, so that we can improve our sites and services and provide them in an effective way.

- g) We may also monitor and record our communications with you, including e-mails and phone conversations which may then be used for training purposes, quality assurance, to record details about the products and services you order from us, and in order to meet our legal and regulatory obligations generally.
- Our lawful ground for processing your personal information for training purposes and quality assurance purposes is that it is in our legitimate business interests, so that we can improve our products and services and provide them in an effective way and provide a good standard of service and improve our customer services.
 - Our lawful ground for processing for the remaining purposes described in this section is that our processing is necessary to deliver our services or we have a legal obligation to use your personal data to comply with any legal obligations imposed upon us.
- h) We may receive information about you from other third party operators in the cases where you are their customer and you are also our customer. Such information we receive may include for example, your contact details and your expressions of interest in products or services that we sell.
- Our lawful ground for processing for the remaining purposes described in this section is that it is in our legitimate business interests to do so, in order for us to improve our products and services and provide them in an effective way.
- i) We receive information from you if you apply for a role with us. We use the personal data you provide to us for recruitment purposes, in particular, to assess your suitability for any of our positions that you apply for, whether such application has been received by us by email via the link on our Careers page or by hard copy and whether submitted directly by you or by a third party recruitment agency on your behalf. We also use your name and contact details to communicate with you about the recruitment process, to keep records about our recruitment process and to comply with our legal and regulatory obligations in relation to recruitment.

We will process any personal data about you that you volunteer, including during any interview, when you apply for a position with us. We may also process your personal data obtained from any third parties we work with in relation to our recruitment activities, including without limitation, recruitment agencies, background check providers, credit reference agencies and your referees.

The personal data we process may include your name, contact details, details of your education, qualifications and employment history, any other personal data which appears in your curriculum vitae or application, any personal data that you volunteer during an interview or your interactions with us, or any personal data which is contained in any reference about you that we receive. Such information may also include special categories of personal data (such as information about your health, any medical conditions and your health and sickness records) and information relating to criminal convictions and offences if that information is relevant to the role you are applying for.

We also use your personal data for the purposes of reviewing our equal opportunity profile in accordance with applicable legislation. We do not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment-related decisions are made entirely on merit.

- Our lawful ground for processing your personal data in connection with recruitment, is that it will be in connection with us taking steps at your request to enter into a contract we may have with you or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment decisions.
- We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.

j) We receive information about you if we have engaged you or the organisation you represent to provide us with products or services. We will collect and process your personal data in order to manage our relationship with you or the organisation you represent, to receive products and services from you or the organisation you represent and, where relevant, to provide our products and services to others. The personal data we collect from you may include your name and contact details and any other personal data you volunteer which is relevant to our relationship with you or the organisation you represent.

- Our lawful ground for processing your personal data is that it is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you or the organisation you represent, or it is in our legitimate interest to use personal data in such a way to ensure that we have an effective working relationship with you or the organisation you represent and are able to receive the products and services that you or your organisation provides, and provide our products and services to others, in an effective way.

k) We need to use your personal data in connection with the administration of our security measures. We have security measures in place at our premises, including CCTV and building access controls. There are signs in place showing that CCTV is in operation. The images captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident). CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft).

We may require visitors to our premises to sign in on arrival and where that is the case we will keep a record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need-to-know basis (e.g. to look into an incident).

- Our lawful ground for processing your personal data is that it is in our legitimate interests so that we can keep our premises secure and provide a safe environment for our personnel and visitors to our premises.

l) We will process your personal data if needed in order to comply with our legal obligations or in connection with the administration of our business. We may use your personal data: (i) to comply with our legal obligations; (ii) to enforce our legal rights; (iii) to protect the rights of third parties; and (iv) in connection with a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.

- Our lawful ground for processing your personal data where we use your personal data in connection with a business transition, to enforce our legal rights or to protect the rights of third parties, it that it is in our legitimate interest to do so. For all other purposes described in this section, we have a legal obligation to use your personal data to comply with any legal obligations imposed upon us, such as a court order.
- We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.

4. How else do we use your personal information?

4.1. Marketing and Advertising

We may need your personal data in order to send to you marketing materials which we think you may be interested in. The ways in which we will market to you are set out below:

- a) If we send you marketing communications by post and/or email:
 - We use your name, contact details and marketing preferences to send you (or the organisation you represent) marketing communications by post and/or email. Our marketing will include press releases and information about us, our site, our products and services and any events we may hold.
 - Our marketing communications will include personalised and non-personalised marketing. Personalised marketing has been specifically tailored to you and will include content that we think is most relevant to you, based on what we know about you. Non-personalised marketing is marketing that is not tailored to you.
 - Where we are sending you personalised marketing, we may also use data we have about your preferences and profile and Transaction Data and Behavioural Data to help us decide what sort of personalised marketing to send you (please see the “Insight, analysis and retargeting through Cookies” section above for more details).
 - Our lawful ground for processing your personal data is as follows:
 - i. It is in our legitimate interest to use your personal data for marketing purposes, for example to decide what marketing content we think may appeal to you.
 - ii. It is in our legitimate interest to use your personal data to send our marketing to you by post.
 - iii. We will only send marketing communications to you by email where you have consented to receive such content by email, or where we have another lawful right to send marketing to you using email. For example, in certain circumstances we may rely on our legitimate interest to send marketing by email to consumers who have purchased our products and services. We may also rely on our legitimate interest to send marketing by email to certain business users of our site and our products and services.
- b) If we carry out any online personalised advertising:
 - We and our third party partners may use your data to provide you with, and analyse the effectiveness of, personalised ads when you visit other websites and/or use other services.
 - Where you have consented to us doing so, we may use personal information, including Behavioural Data and Technical Data, that you provide directly to us, and/or which we collect about your use of our site and services for marketing purposes, either alone or in combination with personal information that we receive about you from third party companies and organisations. We and our third party partners may use your data to provide you with, and analyse the effectiveness of, personalised ads when you visit other websites and/or use other services.
 - Where you have consented to us doing so, we may also share your personal information about your use of our site and services with our advertisers and to other companies which offer their goods or services on our websites.

- By “personalised ads”, we mean advertisements for products and services that you have shown an interest in when you have used our site or which you otherwise might be interested in based on your browsing habits, although our third- party partners may use the data that is collected to show personalised ads for products and services offered by third parties.
- Our lawful ground for processing your personal data is as follows:
 - iv. Please see the “Insight, analysis and retargeting through Cookies” section at 3(e) above to learn about the legal basis that we rely on to collect data via the use of Cookies.
 - v. Where we use your personal data to display online personal advertising to you, we rely on the consent that you have provided in respect of the collection of such data, or it is otherwise in our legitimate interests to promote our site and our products and services to you.
 - vi. Our third party partners may rely on a different lawful basis in respect of their use of your personal data. Please read the privacy policy of the relevant third-party provider, as set out in our Cookies privacy settings in “Manage Cookies Preferences”.
 - vii. Where we receive personal information about you from such third parties which we use for marketing purposes, this is on the basis that such third parties have obtained your consent to such disclosure to, and use by Claranet.
 - viii. Where we share your personal data with third parties, as indicated above, we will rely on your consent.

4.2. Credit checking and account management

- a) When you order goods and services from Claranet, we may make enquiries about you for credit reference purposes. These enquires include searching your records held by a Credit Reference Agency (“CRA”) and checking any details held on you by Fraud Prevention Agencies (“FPA’s”). When CRA’s receive a search from us they will place a footprint on your credit file that may be seen by other organisations. At all times where your personal information is disclosed to us we will protect it in accordance with this privacy policy. We do this to help protect you from identity theft and fraud, and also to prevent and detect crime and money laundering.
 - Our lawful ground for processing your personal information for these purposes is that it is in our legitimate business interests to do so.
- b) Personal information on applications will be sent to CRA’s and will be recorded by them. We may also give them details of your accounts and billing information, including how you manage it/them to CRA’s. We may tell them about payments you make to us, your account balances, and payment defaults. We may also give them historical information we hold about your payment history with us. If you do not pay your bills on time, CRA’s will record this information and it may be supplied to other organisations by CRA’s and FPA’s to perform similar checks and to trace your whereabouts and recover debts that you owe to them as well as us.
 - Our lawful ground for processing your personal information for the purposes described in this section is that it is in our legitimate business interests to do so.

5. Do we share your personal information with anyone else?

5.1. External companies

We only share personal data with others when we are legally permitted to do so. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the personal data shared and to comply with our data protection, confidentiality and security standards and obligations. We may need to share your personal data with third parties (including other entities within our group of companies), as set out in the table below. This list is non-exhaustive and there may be circumstances where we need to share personal data with other third parties.

THIRD PARTIES	DATA SHARED
Third-party suppliers who provide applications/ functionality, data processing or IT services	We share personal data with third parties who support us in providing our site and help provide, run and manage our internal IT systems. Such third parties may also include, for example, providers of information technology, cloud-based software-as-a-service providers, identity management, website design, hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them. We also share your personal data with third-party service providers to assist us with insight analytics. These providers are described in our privacy settings in "Manage Cookie Preferences"
Payment providers and banks	We share personal data with third parties who assist us with the processing of payments and refunds..
Advertising partners	We share personal data with third party advertising partners, including those set out in our Cookies privacy settings when you use our site. This data is used to provide you with, and measure the effectiveness of, online personalised advertising and for other advertising related activities.
Third-party post/email marketing and CRM specialists	We share personal data with specialist suppliers who assist us in managing our marketing database and sending out our post and email marketing communications and account-related communications.
Recruitment agencies and related organisations	We share personal data with external recruiters, third-party providers that undertake background checks on our behalf and other entities within our group of companies.
Auditors, lawyers, accountants and other professional advisers	We share personal data with professional services firms who advise and assist us in relation to the lawful and effective management of our organisation and in relation to any disputes we may become involved in.

- a) Our lawful ground for processing your personal information for the purposes described in this section 5.1 is because it is in our legitimate business interests to do so.

5.2. Lawful requests

- a) We may provide your personal information, in response to lawful requests, for the purposes of the prevention and detection of crime, and the apprehension or prosecution of offenders. We may also provide information for the purpose of safeguarding national security. In either case we do so in accordance with applicable data protection legislation. We also provide your personal information to third parties when required to do so by law, for example under a court order, or in response to lawful demands, under powers contained in legislation.
- b) Our lawful ground for processing your personal information for the purposes described in section 5.2 is because such processing is necessary for us to comply with legal obligations we are subject to.

6. For how long does Claranet keep your personal information?

- a) Unless there is a specific legal requirement for us to keep your personal information, we will retain it for no longer than is necessary for the purposes for which the data was collected or for which it is to be further processed.
- b) If any personal data is only useful for a short period (e.g. for a specific activity, promotion or marketing campaign), we will not retain it for longer than the period for which it is used by us.
- c) If you have opted out of receiving marketing communications from us, we will need to retain certain personal data on a suppression list indefinitely so that we know not to send you further marketing communications in the future. However, we will not use this personal data to send you further marketing unless you subsequently opt back in to receive such marketing.

7. How do we protect your data when it is transferred outside the EEA and UK?

- a) Claranet complies with the rules in applicable data protection legislation governing the transfer of your personal information from countries in the European Economic Area (“EEA”) and United Kingdom (“UK”) to countries outside the EEA and UK. We do sometimes transfer your personal information to a country outside the EEA and UK but before doing so we will comply with our legal and regulatory obligations in relation to your personal data, including having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data. We will take reasonable steps to ensure the security of your personal data in accordance with applicable data protection laws.
- b) When transferring your personal data outside the EEA or UK, we will, where required by applicable law, implement at least one of the safeguards set out below. Please contact us if you would like further information on the specific mechanisms used by us when transferring your personal data outside the EEA or UK.

Adequacy decisions	We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission and/or the UK Government (as applicable).
Model clauses	Where we use certain service providers, we may use specific standard contractual clauses approved by the European Commission and/or the UK Government which give personal data the same protection it has in Europe and/or the UK.

8. How do we protect your personal information?

8.1. Security

We are serious about guarding the security of your personal information. We take appropriate organisational and technical security measures to protect your personal information against unauthorised disclosure or processing. In addition, all our employees and data processors (i.e. those who process your personal data on our behalf) are obliged to respect the confidentiality of the personal data of all users of our site and those who purchase our products and services.

8.2. Passwords

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

8.3. Other security measures

We use various security measures to protect the information we collect, as appropriate to the type of information, including encryption, firewalls, and access controls. Our company databases are accessible only by persons who have entered into and are bound by a confidentiality and nondisclosure agreement with Claranet.

8.4. Internet security and associated risks

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

9. How to access your personal information and your other rights?

9.1. You have the following rights in relation to the personal information we hold about you:

- a) Your right of access. If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- b) Your right to rectification. If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and its lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.

- c) Your right to erasure. You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where possible and it is lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- d) Your right to restrict processing. You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where possible. If you ask us, where possible and it is lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- e) Your right to data portability. You have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine-readable format) and to reuse it elsewhere or ask us to transfer this to a third party of your choice.
- f) Your right to object. You can ask us to stop processing your personal information, and we will do so, if we're:
 - relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;
 - processing your personal information for direct marketing.
- g) Your rights in relation to automated decision-making and profiling. You have the right not to be subject to a decision when it's based on automatic processing, including profiling, and it produces a legal effect or similarly significantly affects you unless such profiling is necessary for entering into, or the performance of, a contract between you and us.
- h) Your right to withdraw consent. If we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.
- i) Your right to lodge a complaint with the supervisory authority. If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office ("ICO"). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.10.

10. Changes to Our Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

11. Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Claranet Limited, 110 High Holborn, London, England, WC1V 6JS or by email at privacy@uk.clara.net