

## Shine Networks Limited Privacy and Customer Data Retention Policy

This privacy policy is designed to help you understand what information we collect and how we use it. This policy only describes how Shine Networks treats your information, not how other organisations treat your information. If you are using services or products provided by Shine Networks in a workplace. On a device or account issued to you by your employer or another organisation. That company or organisation likely has its own policies regarding storage, access, modification, deletion, and retention of communications and content which may apply to your use of any Shine Networks products or services. Content that would otherwise be considered private to you or to a limited group of people may, in some cases, be accessible by your owner, manager or administrator. Please check with your employer or manager about the policies it has in place regarding your communications and access to data.

This privacy notice supplements the other notices and is not intended to override them.

### Information we collect

Shine Networks collects different kinds of information. Some of it is personally identifiable and some are non-identifying or aggregated. Here are the types of information we can in some instances collect or receive:

Account Information – This includes names and contact details for contacts at your business that created the account or manage your account with us. This is vital for account management and accounting purposes. Plus conforming to our regulatory provisions for providing accurate access to the emergency services.

Call Detail Records (CDRs) – This is a record of the communication that has traversed the Shine Networks network. It typically includes a data of the calls source, destination and duration, although it can also include quality metrics and fraud prevention data too. CDRs allow us to create an itemised bill for you which forms part of our accounting procedures.

Payment Records – Shine Networks retains a transaction history of purchases made for products and services. This is fundamental to our accounting processes.

Radius Logs – Shine Networks has access to data on Broadband sessions, such as the time the connection commenced and duration. Shine Networks may also log metrics such as sync data, speeds and bandwidth used.

Websites and portals – Our websites use cookies in order to offer users functionality. We also use cookies for analytical and service improvements. Shine Networks monitors login data for fraud and security protection.

Communicating with Shine Networks – We operate systems which log details of calls (including recordings) and email correspondence. This allows us to deal with our customers effectively.

Call Recordings – Call recordings are enabled by default, when dialling one of our main numbers this will be advised to the caller. If desired, you can request and are opt-in only.

Cookies - Cookies enable you to use shopping carts and to personalize your experience on our websites, tell us which parts of our websites people have visited, help us measure the effectiveness of ads and web searches, and give us insights into user behaviour so we can improve our communications and products. Shine Networks websites use cookies.

We do not collect any Personal Data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### How we use your information (Processing your data)

Shine Networks uses your information for the following:

Providing the Shine Networks service and improving our products - To make the product better we have to understand how users are using it.

Investigating and preventing abuse and fraud - This may also include requests from the authorities or courts.

Communicating with you - Solving your faults and responding to your requests. If you contact us with a problem or question, we will use your information to respond to that request and address your problems or concerns.

Email messages - We may send you service and administrative emails. We may also contact you to inform you about changes in our services, our service offerings and important service-related notices, such as changes to this policy or security and fraud notices. These messages are considered part of the service and you may not opt-out of them.

Disaster Recovery - Our ability to restore availability and access to personal data in a timely manner in the event of an incident.

The lawful basis for these uses will be one of the following, Performance of a contract with you, Necessary for our legitimate interests or Necessary to comply with a legal obligation.

#### Sub-processing

We may appoint other processors ("sub-processors") to process data, sometimes personal data on its behalf in connection with the services and products provided to you. These third parties may include third-party service providers and other entities in our group.

If we engage another processor to carry out specific activities or services that are required to provide a service to you, we will ensure that the sub-processor only does so on the instructions of us. And that any sub-processors agrees to provide a level of protection for the rights and freedoms of individuals whose personal data is being processed which is at least equivalent to the protection provided by ourselves. With appropriate technical and organisational measures in such a manner that processing relating to security, integrity and confidentiality.

#### Fair and Lawful Processing

Many of the current regulations and processes Shine Networks adhere to, require a person to be named as the subscriber for the service. An example of this may be a telephone number or broadband service, that cannot be anonymous or unnamed or without an address for installation for emergency services purposes. Person(s) not happy to have their details provided and want to continue with services should, therefore, offer alternative details to allow Shine Networks to continue being able to continue providing existing services.

#### Data Retention

Call Recordings – If activated you calls are stored for 30 calendar days unless you have purchased a longer storage service.

Call Detail Records (CDRs) – Are stored for 36 calendar months and then deleted.

Account Data - If the authorised account holder chooses to deactivate the account. The data will be archived for no more than 15 years.

Correspondence - This includes but is not limited to: emails, call-recordings, CDRs, webchats, Fax transmissions and post. The data may be kept for no more than 15 years.

Payment Data – Shine Networks does not process nor retain card payment data. All sensitive transactional payment data, such as Direct Debits are processed and stored in accordance with Direct Debit regulations.

## Sharing and Disclosure

There are times when related content and other user information may be shared by Shine Networks. With consent, to comply with legal process, or to protect Shine Networks and our users. When we have your consent or if we believe that disclosure is reasonably necessary to comply with a law, regulation or legal request; to protect the safety, rights, or property of the public, any person, or Shine Networks; or to detect, prevent, or otherwise address fraud, security or technical issues. If we receive a law enforcement or other third-party request for information we will provide prior notice to the subject of the request where we are legally permitted to do so.

Examples of sharing and disclosure are below and but not strictly limited to the following:

Example: Telephone number subscriber information is shared with authorities for emergency services purposes (999/911)

Example: Telephone number subscriber information is shared between the companies involved in a telephone number port as validation. (Openreach/BT along with the current Range Holder, Losing Service Provider and Gaining Service Provider)

Example: Fixed line services (Broadband and WLR) require installation addresses and a contact for the installation, therefore, disclose of this information is given to those involved in the provision and installation of these services.

Example: Fault finding such as UK BT WLR based services sometimes require engineer visits in which case we would ask your permission to provide a contact telephone number and name. These visits can be from BT Group companies or subcontractors or LLU providers and their subcontractors.

Example: Direct Debit data is stored and processed with the BACSTEL payment network.

Example: Some international telephone number rentals require the subscriber to provide official identity documents as a regulatory requirement in that country.

## Security

Shine Networks takes reasonable steps to protect the information you provide to us as part of your use of the Shine Networks service from loss, misuse, and unauthorised access or disclosure. These steps take into account the sensitivity of the information we collect, process and store and the current state of technology. When you provide sensitive information (such as sign-in credentials) we encrypt the transmission of that information using secure socket layer technology (SSL) and encrypt other data at rest. We follow generally accepted standards to protect the personal data submitted to us, both during transmission and once we receive it.

## Data Storage and Transfers

Data Subjects have the right in relation to their personal data under the Privacy Legislation. Those rights include;

- The right to be informed
- The right of access
- The right to rectification

- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

Customers should contact Shine Networks in relation to these queries.

If you fail to provide certain information when requested, we may not be able to fully perform the contract we have entered into with you.

#### Changes to this Privacy Policy

Shine Networks may change this policy from time to time. If you continue to use Shine Networks after those changes are in effect, you agree to the revised policy. If the changes are material, we may provide more prominent notice or seek your consent to the new policy.

If you have any complaints, questions or comments about this privacy policy or Shine Networks Limited's use of your personal information, you can contact Shine Networks on 0800 254 55 44 or [dataofficer@shinenetworks.net](mailto:dataofficer@shinenetworks.net)