DEE COMMUNICATIONS LIMITED PRIVACY POLICY

Dee Communications Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits our website www.deecommunications.co.uk ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"Account" means an account required to access and/or use certain areas and features of Our Site;

"Cookie" means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 13, below, and Our Cookie Policy;

"Cookie Law" means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

"Personal Data" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and

"We/Us/Our" means Dee Communications Limited, a limited company registered in England and Wales under company number 1366415, whose registered address is: Dutton Court, Dutton Green, Stanney Mill, Chester. CH2 4SA.

2. Information About Us

- 2.1 Our Site is owned and operated by Us.
- 2.2 Our VAT number is GB310176994.

2.3 Our Data Protection Officer can be contacted by email at: data-protection@deecommunications.co.uk. Or by post at: Dutton Court, Dutton Green, Stanney Mill, Chester. CH2 4SA.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Rights

- 4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
- 4.1.1 The right to be informed about Our collection and use of personal data;
- 4.1.2 The right of access to the personal data We hold about you (see section 12);
- 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
- 4.1.4 The right to be forgotten i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
- 4.1.5 The right to restrict (i.e. prevent) the processing of your personal data;
- 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- 4.1.7 The right to object to Us using your personal data for particular purposes;
- 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 14 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Data Do We Collect?

Depending upon your use of Our Site, We may collect some or all of the following personal data (please also see section 13 on Our use of Cookies and similar technologies and Our Cookie Policy):

- 5.1 Name;
 5.2 Job title;
 5.3 Email address's;
 5.4 Telephone numbers;
 5.5 Demographic information such as post code, preferences, and interests;
 5.6 IP address;
 5.7 Web browser type and version;
 5.8 Operating system;
 5.9 Device make and model;
 5.10 Referral and exit URLs;
- 6. How Do We Use Your Data?

5.11 Site usage data.

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
- 6.2.1 Providing and managing your Account;
- 6.2.2 Providing and managing your access to Our Site;
- 6.2.3 Personalising and tailoring your experience on Our Site;
- 6.2.4 Supplying Our products and services to you (please note that We require your personal data in order to enter into a contract with you);
- 6.2.5 Personalising and tailoring Our products and services for you;

- 6.2.6 Replying to emails from you;
- 6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by replying to the email with unsubscribe in the subject line;
- 6.2.8 Market research;
- 6.2.9 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience.
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email or telephone or text message or post with information, news and offers on Our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 6.4 Third parties whose content may appear on Our Site may use third party Cookies, as detailed below in section 13. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use, We advise you to check the privacy policies of any such third parties.
- 6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Please refer to our <u>Data Retention Policy</u> for details of how long we will store your personal data.

7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Your data will be stored within the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein);
- 7.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.
- 7.4 Steps We take to secure and protect your data are outlined in our <u>Data Protection</u> <u>Policy</u>.

8. Do We Share Your Data?

8.1 Subject to section 8.2, we will not share any of your data with any third parties for any purpose.

8.4 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. What Happens If Our Business Changes Hands?

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or new controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- 9.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

10. How Can You Control Your Data?

- 10.1 When you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing by replying to Our emails with unsubscribe in the subject line or at the point of providing your details.
- 10.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

11. Your Right to Withhold Information

- 11.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.
- 11.2 You may restrict Our use of Cookies. For more information, see section 13 and <u>Our Cookie Policy.</u>

12. How Can You Access Your Data?

12.1 If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "Subject Access Request" (SAR).

- 12.2 All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 14. To make this as easy as possible for you, a <u>Subject Access</u> <u>Request Form</u> is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.
- 12.3 There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.
- 12.4 We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

13. Our Use of Cookies

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products. By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site for security, content delivery and providing users with support. In addition, Our Site uses analytics services provided by Google, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site. For more details, please refer to Our Cookie Policy.

14. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at: data-protection@deecommunications.co.uk, or by post to: Dee Communications Limited, Dutton Court, Dutton Green, Stanney Mill, Chester. CH2 4SA. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

15. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.