

Data Protection and Privacy Policy



GRAPEVINE TELECOM (BATH) LIMITED registered at Herston Cross House, 230 High, Street, Swanage, Dorset, BH19 2PQ ("the Company") takes your privacy very seriously and you must read this policy because it gives important information in relation to:-

- The data protection principles with which the Company must comply;
- What is meant by "personal information" (or data) and "sensitive personal information" (or data);
- How we gather, use and ultimately delete personal information and sensitive personal information in accordance with the data protection principles;
- Where more detailed privacy information can be found, for instance in connection with the personal information we gather and use about you, how it is used, stored and transferred;
- Your rights and obligations in relation to data protection.

When we use your personal data we are regulated under the EU General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

Key Terms

It would be helpful to explain some of the key terms used in this policy:-

"Confidential Information" means information of a confidential nature relating to a party's technology, technical processes, business affairs, credit, finances or customers and information derived from any such information or relating to any associated body, connected organisation, employees, suppliers or customers of that party, agents and their respective technology, technical processes, business affairs, credit finances or customers.

"Contracted Services" means the services which the Company has agreed to provide to its customers (you) in accordance with its agreements.

"Customer Personal Data" means Personal Data that is controlled by the customer and that the Company requires to process on the customer's behalf as a processor to provide the Contracted Services to the Customer.

"Personal Data" means any information relating to an identified or identifiable individual which may include but is not limited to names, addresses, telephone numbers, dates of birth, electronic contact details, financial details so far as relevant to instructions and other information that may be required for monitoring purposes.

"Sensitive Personal Data" means Personal Data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership, Genetic and biometric data, data concerning health, or other.

1. Introduction

- 1.1 The Company, obtains, keeps and uses personal information (also referred to as Data) relating to customers and known as the Customer Personal Data and the Company may process the Customer Personal Data in order to provide the Contracted Services under its agreements.
- 1.2 The Company may use, manage, access, transfer or hold the Customer Personal Data on a number of systems, networks and facilities (including databases and servers) within the UK and worldwide, to provide the Contracted Services. The systems which the Company currently has in place for such purposes are set out at **Schedule 1** and which can be requested from the Company's registered offices.
- 1.3 The Company may transfer the Customer Personal Data worldwide to the extent necessary to permit the Company to fulfil its obligations under the Contracted Services and the customers authorise the Company to perform the transfers to provide the Contracted Services on the basis that the Company will adhere to all relevant Data Protection legislation which is in force and binding in respect of any transfers and the regulations applicable to any network providers, organisations or other agencies upon which the Company relies as necessary.
- 1.4 The Company may act as both the Data Controller and Data Processor where appropriate to perform the Contracted Services and as such is responsible for and controls the processing of the Customer Personal Data.

2. Purposes

- 2.1 Where the Company is required to act as a Data Controller, the Company may collect, process, use or share Customer Personal Data with any of the Company's agents, affiliates and contractors whom for such purposes would be acting as processors in accordance with the meaning given in the GDPR within (or as the case may be) outside the UK to the country of origin in order to administer, track and fulfil orders for Contracted Services, to perform the Contracted Services, to manage, track and resolve any incidents with the Contracted Services, to administer access to online portals including websites in connection with the Contracted Services, to respond to general and/or more specific enquiries relating to the Contracted Services and any issues/disputes, to maintain and protect the security of the Company's systems and the Contracted Services and to comply with the Company's legal and regulatory obligations including GDPR.
- 2.2. Where the Company acts as a Data Processor, the Company will use Customer Personal Data to provide Contracted Services to the Customer and which will include any steps requested by customers prior to entering into a formal agreement and to process the Customer Personal Data as follows:-
 - 2.2.1 In accordance with the customer's instructions or as required by the Company to comply with its legal and regulatory obligations as necessary or as may reasonably be required to perform the Contracted Services.
 - 2.2.2 To implement both technical and organisational security measures that are

appropriate to the risk represented by the processing and nature of the Customer Personal Data which is processed and to protect the Customer Personal Data against a data breach. This will additionally involve assessing the present technical security and organisational procedures in place to see if they meet the customer's security needs and which are set out at **Schedule 2** and which can be requested from the Company's registered offices.

- 2.2.3 The Company also has procedures in place to deal with any suspected data security breach and where there may be a data security breach, the Company will notify the customer and any applicable regulator of the suspected data security breach where legally required to do so and will notify the customer and the applicable regulator of an actual data security breach.
- 2.2.4 The Company intends to use processors who will assist the Company and customers in compliance with all applicable, legal and regulatory compliance in connection with GDPR, security and other regulations as necessary.
- 2.3 The Company will additionally process Customer Personal Data to conduct checks to identify the Company's customers and verify their identity for prevention and detection, screening for financial and other sanctions or embargoes, other processing necessary to comply with professional, legal and regulatory obligations that apply to the Company's business and to comply with the Company's legal and regulatory obligations.
- 2.4 The Company may process the Customer Personal Data in order to gather and provide information required by or relating to audits, enquiries or investigations by regulatory bodies.
- 2.5 The Company may process Customer Personal Data for operational reasons such as efficiency, training, quality control and the purposes of administration to improve services.
- 2.6 The Company may process Customer Personal Data to ensure the confidentiality of commercially sensitive information.
- 2.7 The Company may process Customer Personal Data for the purposes of statistical analysis to help the Company manage its business including but not limited to its financial performance, customer base, work type, marketing or other efficiency measures.
- 2.8 The Company may process Customer Personal Data to prevent unauthorised access and modifications to systems and to update and enhance customer records.
- 2.9 The Company may use Customer Personal Data for billing purposes and other order fulfilments. The Company may additionally disclose Customer Personal Data to mobile networks with whom the Company partners for billing purposes only.
- 2.10 The Company may process Customer Personal Data for the purposes of marketing and to notify customers of any changes to the Company's business, services it provides or website, which may affect that customer.

- 2.11 The Company may disclose Customer Personal Data to any law enforcement agencies in connection with any investigations to help prevent or detect unlawful activity and any credit reference checks via external credit reference agencies in terms of credit control.
- 2.12 The Company will not process Sensitive Personal Data without documented consent to be provided by the Customer.

3. Data Retention

- 3.1 The Company will retain Customer Personal Data for the period necessary to perform the Contracted Services and will only retain the Customer Personal Data for longer than completion of the Contracted Services, to enable the Company to respond to any questions, complaints or claims made by the Customer or on behalf of the Customer, to demonstrate that the Company has treated the Customer fairly or to keep records as required by the law.
- 3.2 The Company will delete or anonymise the Customer Personal Data when it is no longer necessary to retain it subject to 3.3 below.
- 3.3 The Company will remove the Customer Personal Data that it holds on a formal notification being made by the authorised contact of the Customer to the Company. Please contact the Company's Data Protection Officer who is Mr Edward Lewis at Grapevine, 19-25 Nuffield Rd, Poole, Dorset, BH17 0RU and provide proof of identity and address.

4. Customer Rights

- 4.1 On written notification to the Company, the Customer is entitled to be provided with:-
- a. A copy of the Customer Personal Data in the Company's possession relating to the relevant customer.
 - b. Correction of any mistakes that the Company may hold in terms of Customer Personal Data.
 - c. The right to restrict the Company to process Customer Personal Data in certain circumstances for example, where the accuracy of data is being contested.
 - d. The right to receive the Customer Personal Data that the customer provided to the Company in a structured, commonly used and machine-readable format and/or transmit that data to a third party in certain situations.
 - e. The right to object at any time to the Customer Personal Data being processed for direct marketing (including profiling) and in certain other situations for the Company's continued processing of Customer Personal Data.

- f. The right not to be subject to a decision based solely on automated processing including profiling that may produce legal effects concerning the customer or similarly significantly affects the customer.

More information in respect of each of these rights, including circumstances in which they apply, can be found at Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the Data Protection Regulation.

5. Training

- 5.1 The Company will ensure that staff are adequately trained regarding their data protection responsibilities and those individuals whose roles require regular access to Personal Data relating to customers or who are responsible for implementing any Data Protection policies or responding to Subject Access Requests, will receive additional training to help them understand their duties and how to comply with them.
- 5.2 The Company will ensure that the staff are further and adequately trained in respect of the present security measures and systems that the Company has in place in keeping data secure.
- 5.3 The Company will ensure that persons authorised by the Company to process the Customer Personal Data will be bound by duties of confidentiality.
- 5.4 On receiving a written request from the Customer, the Company will within 30 days, provide to the Customer information supporting the Company's compliance as well as with security measures and appropriate confidentiality obligations.
- 5.5 Any customer who is not satisfied with any use of Customer Personal Data, should in the first instance contact the Company. The General Data Protection Regulations also give the customer an additional right to lodge a complaint with the Supervisory Authority which in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113 or the applicable supervisory authority in the European Union (or European Economic Area) state where applicable.

6. Changes to Data Protection and Privacy Policy

This policy was last updated March 2023.

The Company will notify the customer of any amendments that it proposes to make to this policy in the future in a timely manner.



James Spinks
Managing Director