

# ZOOM INTERNET LIMITED PRIVACY POLICY

(PUBLISHED MAY 2018)



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## 1. OUR CORE BELIEFS REGARDING USER PRIVACY AND DATA PROTECTION

1.1 - We are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data

1.2 - We believe

- User privacy and data protection are human rights
- We have a duty of care to the people within our data
- Data is a liability, it should only be collected and processed when absolutely necessary
- We will never sell, rent or otherwise distribute or make public your personal information

## 2. RELEVANT LEGISLATION

2.1 - Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- [UK Data Protection Act 1988 \(DPA\)](#)
- [EU Data Protection Directive 1995 \(DPD\)](#)
- [EU General Data Protection Regulation 2018 \(GDPR\)](#)

## 3. PERSONAL INFORMATION AND COOKIES

3.1 - This website collects and uses personal information. By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

3.2 - We use cookies on our site to help us improve the user experience. By continuing to browse the site, you are giving your consent to our use of cookies. If this is not something you wish to allow, please change the cookie settings in your browser.

Some cookies on this site are essential, and the site won't work as expected without them. We also use some non-essential cookies to anonymously track visitors as per Google Analytics listed below or enhance your experience of the site. These cookies are set when you submit a form, login or interact with the site by doing something that goes beyond clicking on simple links.

3.3 - Google Analytics uses cookies to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google will not associate your IP address with any other data held by Google. We will never (and will not allow any third party to) use Google Analytics to track or collect any personally identifiable information of visitors to our site. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user. To control third party cookies, you can also adjust your browser settings as below.



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3.4 - If you would rather disable cookies when browsing this site, all modern browsers will allow you to do this. Here is a list of how to disable cookies using the four most popular browsers.

[Cookie settings in Internet Explorer](#)

[Cookie settings in Firefox](#)

[Cookie settings in Chrome](#)

[Cookie settings in Safari](#)

If your browser is not on the list, we suggest using the 'Help' feature in your browser for further information.

3.5 - Should you choose to contact us using the contact form on our Contact page none of the data that you supply will be stored by this website or passed to / be processed by any of the third party data processors defined in section 6. Instead the data will be collated into an email and sent to us over the Simple Mail Transfer Protocol. Our SMTP servers are protected by TLS (sometimes known as SSL) meaning that the email content is encrypted using SHA-2, 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices in the UK.

## 4. HOW WE STORE YOUR PERSONAL INFORMATION

4.1 - In the near future we aim to change the storage of this data to a pseudonymous fashion meaning that the data would require additional processing using a separately stored 'key' before it could be used to identify an individual.

## 5. ABOUT THIS WEBSITE'S SERVER

5.1 - This website is hosted internally by Zoom Internet within the UK located in the south of England. All traffic (transferral of files) between this website and your browser is encrypted and delivered over HTTPS.

## 6. OUR THIRD PARTY DATA PROCESSORS

6.1 - All the personal data we process is processed by our staff in the UK, additionally information for the purposes of IT hosting and maintenance is located on servers within the UK. We use a number of third parties to process personal data on our behalf. None of these third parties have access to your personal data unless the law allows them to do so.

6.2 - Our third parties have been carefully chosen and comply with the GDPR legislations. Any providers outside the EU are covered with Privacy Shield to be compliant.

6.3 - We have a Data Protection regime in place to oversee the effective and secure processing of your personal data.

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## 7. HOW WE USE YOUR PERSONAL DATA

7.1 - We may disclose your name, address, contact telephone number, IP address, to subcontractors insofar as is reasonably necessary for purposes of a site survey to determine the internet speeds you will receive at your location, for purposes of the installation of the internet service, for any necessary repairs to or removal of the equipment, for administration purposes and for monitoring of the network.

7.2 - We may process your account data. The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of providing our services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

7.3 - We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

7.4 - We may process information relating to transactions, including the purchases of our internet services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying our internet services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

7.5 - In addition to the specific disclosures of personal data, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7.6 - We may process your personal data identified in the other provisions of this policy where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

## 8. RETAINING AND DELETING PERSONAL DATA

8.1 - This Section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.



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8.2 - Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

8.3 - Personal data will be retained for one year following cessation of your internet service, at the end of which period it will be deleted from our systems.

8.4 - In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the legal nature of the necessity for retention.

8.5 - If at any point you believe the information we process on you is incorrect you can request to see this information and have it corrected or deleted.

8.6 - If you wish to raise a complaint on how we have handled your personal data, you can contact us to have the matter investigated.

8.7 - If you are not satisfied with our response or believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office <https://ico.org.uk>

## 9. AMENDMENTS

9.1 - We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy.

## 10. YOUR RIGHTS

10.1 - You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

10.2 - The supply of appropriate evidence of your identity for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address.

10.3 - We may withhold personal information that you request to the extent permitted by law.

## 11. DATA BREACHES

11.1 - We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.



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## 12. DATA CONTROLLER

The data controller of this website is: Zoom Internet Limited, a UK Private limited Company with company number: 9649178

Whose registered office is:

Beechenhurst House,

74-76 Barrack Lane

Bognor Regis

PO21 4DE

## 13. CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.