



PRIVACY POLICY

Your privacy is very important to us

Accordingly, we have developed this Policy in order for you to understand how we collect, use, communicate, disclose and make use of personal information. The following outlines our privacy policy.

1) Spectrum Telecommunications Limited ("Spectrum") does not collect personally identifiable information about you except:

- when you provide such information on a voluntary basis;
- through your use of Spectrum's products and/or services;
- through your interaction with Spectrum's e-mails or website, as described in paragraph 4;
- and when Spectrum obtains such information from another source (for example, a credit reference agency), together ("Your Information").

2) Your Information may include your name, address, date of birth, gender, mobile and contact telephone numbers, fax number, e-mail address, bank and credit/debt card information, occupation and employment data, details of how you use Spectrum's services, the internet protocol ("IP") address of your computer, and details of how you interact with Spectrum's emails. We do not collect other personal information, or any sensitive personal information such as information on you racial or ethnic origins, religious beliefs, trade union affiliations, sexual life, health or criminal activity. We will hold such consumer information in accordance with the following principles:

- fairly and lawfully processed;
- processed for limited purposes;
- adequate, relevant and not excessive;
- accurate;
- not kept longer than necessary;
- processed in accordance with the data subject's rights;
- secure; and
- not transferred to countries without adequate protection.

3) Spectrum may hold and process Your Information for any purpose relating to or connected with:

- the management of your account;
- Spectrum's business;
- the provision of Spectrum's current or future products and/or services;
- credit checks or verification of identity;
- any legal, governmental or regulatory requirement;
- legal proceedings;
- the prevention or detection of crime or fraud; and
- the protection of Spectrum's legitimate interests.

4) Spectrum may use emails which allow Spectrum to track if an email was opened and read, when, and by whom. Spectrum may also use HTML links within emails Spectrum sends you to track which links are being clicked on, when and by whom. Aggregated data from this is used to tailor Spectrum's emails. Spectrum may also contact you as a result of you opening an email or clicking on a link, to provide you with information about other Spectrum products or services which Spectrum believes may be of interest to you. Spectrum may also record the IP address of computers used to access Spectrum's website to verify the identity of users of the website, to prevent fraud and to ensure that the website is being used for legitimate purposes.

5) If you have ticked the relevant box on your contract or otherwise given your consent, Spectrum may also contact you by phone, post, fax, email, or SMS from time to time with information about other Spectrum products or services which Spectrum believes may be of interest to you. Please contact Spectrum Client Services if you do not wish your personal information to be used for these purposes.

6) If you have ticked the relevant box on your contract or otherwise given your consent, Spectrum may also contact you by phone, post, fax, email, or SMS from time to time about the products and services of carefully selected third parties which Spectrum believes may also be of interest to you and, without passing control of Your Information, enable you to receive marketing and/or promotional information from them.

7) Subject to the terms of this Policy, Your Information will not be sold or otherwise transferred to third parties without your approval. Spectrum is not responsible for any actions or policies of such third parties and users should check the applicable privacy policy of such party when providing personally identifiable information.

8) Spectrum may disclose to credit reference agencies details of your agreement with Spectrum, any payments made under any such agreements, account balances and information about any default, dispute, queries and debts. Spectrum may also disclose details of any change of address reported to Spectrum or of which Spectrum becomes aware. The information supplied by Spectrum and held by credit reference agencies is used by Spectrum and other organisations to help make decisions about other credit applications by you or other members of your household with whom you are linked financially; and to trace debtors, recover debts and to prevent and detect fraud. Spectrum may also check and share your details with fraud prevention agencies who will record details of any false or inaccurate information provided by you where we suspect fraud. Records held by fraud prevention agencies will also be used by other organisations to help them make decisions on motor, household, credit, life and other insurance proposals and insurance claims, for you and members of your household, and to help prevent money laundering where applicable. By writing to Spectrum Telecoms, 4 Faraday Court, First Avenue, Centrum 100, Burton Upon Trent, Staffs, DE14 2WX, you can ask us at any

time for details of the credit reference and fraud prevention agencies to whom we disclose and obtain information about you.

9) Where necessary or otherwise allowed, Spectrum may also pass Your Information to certain third parties (some of which may be based outside of the European Union). Such third parties may include:

- those who provide to Spectrum products or services that support Spectrum's services;
- if your bill is paid by someone else (for example, your employer), that person or their agencies;
- organisations involved in the prevention or detection of fraud or crime or the apprehension or prosecution of offenders, including the operators and participants of crime prevention schemes in which Spectrum participates who may compare Your Information with information collected from other sources and who may keep a record of the searches Spectrum makes against your name; and
- anyone to whom Spectrum transfers that part of its business of which you are a customer or a potential customer in accordance with paragraph 12 below. Such entities including their professional advisers may use and disclose Your Information for the same purposes as Spectrum and its advisers. By entering into product and/or a services agreement with Spectrum, you consent to such transfers of your personal data.

10) If you wish to:

- update or correct Your Information; or
- request that Your Information is removed from our direct marketing database, please write to Spectrum Telecoms, 4 Faraday Court, First Avenue, Centrum 100, Burton Upon Trent, Staffs, DE14 2WX.

11) If you provide Spectrum with information about or relating to another individual it is your responsibility to ensure that that individual is aware and has agreed to your conveying such information to Spectrum.

12) In the event that Spectrum's business is sold or integrated with another business, Your Information will be disclosed to our advisers and any prospective purchaser's advisers and will be passed to the new owners of the business.

13) You are entitled to obtain a copy of the personal information Spectrum holds about you. Please write to Spectrum Telecoms, 4 Faraday Court, First Avenue, Centrum 100, Burton Upon Trent, Staffs, DE14 2WX. Please provide proof of your identity, and confirm your account number(s) with Spectrum and briefly describe the information you require.

14) We may monitor, record, store and use any telephone, e-mail or other communication with you in order to check any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.

15) Spectrum reserves the right to change this policy at any time by publishing a revised privacy policy on the website. This policy and the statements outlined herein are not intended to and do not create any contractual or other legal rights in or on behalf of any party.

We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained.

Questions or Comments

If you have any questions, comments, or concerns relating to this privacy policy, please send an email to trish.simms@spectrum-coms.co.uk or write to us at:

Spectrum Telecoms
4 Faraday Court
Centrum 100
Burton-Upon-Trent
Staffordshire
DE14 2WX

We will make every effort to resolve your concerns.

www.spectrum-coms.co.uk