

www.grayshottgigabit.com Privacy Policy

Type of website: Internet Service Provider Portfolio, Products, Services & General Information, Blogs, & ecommerce.

Effective date: 15th day of January, 2021

www.grayshottgigabit.com (the "Site") is owned and operated by Grayshott Gigabit Limited. Grayshott Gigabit Limited is the data controller and can be contacted at:

dataprotection@grayshottgigabit.com

08000 886784

Suite 21-25, Marshall House, 124 Middleton Road, Morden, SM4 6RW

Purpose

The purpose of this privacy policy (this "Privacy Policy") is to inform users of our Site of the following:

1. The personal data we will collect;
2. Use of collected data;
3. Who has access to the data collected;
4. The rights of Site users; and
5. The Site's cookie policy.

This Privacy Policy applies in addition to the terms and conditions of our Site.

GDPR

For users in the European Union, we adhere to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation (the "GDPR"). For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018.

We have not appointed a Data Protection Officer as we do not fall within the categories of controllers and processors required to appoint a Data Protection Officer under Article 37 of the GDPR.

Consent

By using our Site users agree that they consent to:

1. The conditions set out in this Privacy Policy.

When the legal basis for us processing your personal data is that you have provided your consent to that processing, you may withdraw your consent at any time. If you withdraw your consent, it will not make processing which we completed before you withdrew your consent unlawful.

You can withdraw your consent by: In specific situations, we may collect and process yPlease send us an email to withdraw your consent to Info@grayshottgigabit.com.

Legal Basis for Processing

We collect and process personal data about users in the EU only when we have a legal basis for doing so under Article 6 of the GDPR.

We rely on the following legal bases to collect and process the personal data of users in the EU:

1. Users have provided their consent to the processing of their data for one or more specific purposes;
2. Processing of user personal data is necessary for us or a third party to pursue a legitimate interest. Our legitimate interest is not overridden by the interests or fundamental rights and freedoms of users. Our legitimate interest(s) are: We receive, collect and store any information you enter on our website or provide us in any other way. In addition, we collect the Internet protocol (IP) address used to connect your computer to the Internet; login; e-mail address; password; computer and connection information and purchase history. We may use software tools to measure and collect session information, including page response times, length of visits to certain pages, page interaction information, and methods used to browse away from the page. We also collect personally identifiable information (including name, email, password, communications); payment details (including credit card information), comments, feedback, product reviews, recommendations, and personal profile.

We may also use your personal data where it is necessary to pursue our legitimate interests (or those of a third party) but only in a way which might reasonably be expected as part of running our business and only where such interests are not overridden by your fundamental rights, freedoms or interests.

We may process your personal data under this basis for the legitimate running of our business, to facilitate our internal business operations including assessing and managing risk, to manage our business and financial affairs and to protect our customers, employees and property. It is in our interests to ensure that our processes and systems operate effectively and that we can continue operating as a business.

We may also use your personal information for the legitimate interest of helping to prevent and detect crime and fraud and to prevent and detect criminal attacks on our network or

against your equipment. We monitor traffic over our network, trace nuisance or malicious usage, and track malware and cyber-attacks.

To do that, we may use the following information:

Your contact details and other information to confirm your identity and communications with us. This includes your name, gender, address, phone number, date of birth, email address, passwords and credentials (for example, security questions).

Your payment and financial information

Information from credit reference and fraud prevention agencies

Details of the products and services you've bought and how you use them – including your call, browser (including IP address) and TV records

CCTV footage in or around company premises.;

3. Processing of user personal data is necessary for us to take, at the request of a user, steps before entering a contract or for the performance of a contract to which a user is a party. If a user does not provide the the personal data necessary to perform a contract the consequences are as follows: When you register your interest, apply for, use and/or purchase products and/or services from us, or contact us with queries, we may ask you to give us, where necessary, personal and contact details including your name, address, phone number, date of birth, as well as your financial details including your bank account, payment method, credit card number.

When you write to us, talk to us on the phone, email or communicate with us via electronic messaging (such as SMS or live chat tools), we may collect personal and contact details including your name, address, phone number, email address, as well as any other information that you provide to us via such communications.

In customer surveys from time to time to help us provide you with improved services, we will collect the information you provide to us including your name, phone number, email address and information about how you use our website, apps, products and/or services.

When you visit our website(s) and/or apps, we'll use cookies (which are stored on your device(s) – your laptop, mobile phone, tablet etc.) to collect information about your use of our online services.

When you use our services we may collect information about your use of those services including the following:

Usage data - including frequency, time and data used per month

Call data - including time, duration, originating and destination number

Billing, payment and transaction data – including your financial details, bills and its components

Technical data related to your television viewing such as time and duration of watched content, information on the content recorded/watched, MAC/IP address, the quality of the connection

Technical Data relating to your premise Wi-Fi analytics, performance, interference, security, and monitoring, in order to provide a managed Wi-Fi service.

Interactive data including apps usage data, websites usage / visits data

Device data including IP address, device make and manufacturer, browser information and other similar identifying information required from your devices to communicate with websites and applications on the internet.

We may also monitor, record, store and use the communications we have directly with you to improve the quality of our customer service and/or for training, operational and compliance purposes.

In specific situations, we may collect and process your data with your consent including the following:

If you contact us via our website with queries about our service, we may we request your consent to process your location data to determine your eligibility for our products and services and, in particular, whether and when our products and services may be available in your area

We may request your consent in order to send marketing communications regarding our services and/or products via our apps, website or otherwise.

However, if we do so, you have the right to withdraw your consent at any time. This will not

affect the lawfulness of any processing carried out before you withdraw your consent. Please note that if you do withdraw your consent, we may not be able to provide certain information, products or services to you.; and

4. Processing of user personal data is necessary for us to comply with a legal obligation. If a user does not provide the the personal data necessary for us to perform a legal obligation the consequences are as follows: If the law or any regulator in any competent jurisdiction requires us to, we may need to collect and process your data and also provide this to any such regulator. However, we would need to be satisfied that a request for information is lawful and proportionate and we would need appropriate assurances about security, how the information is used and how long it is kept..

Personal Data We Collect

We only collect data that helps us achieve the purpose set out in this Privacy Policy. We will not collect any additional data beyond the data listed below without notifying you first.

Data Collected Automatically

When you visit and use our Site, we may automatically collect and store the following information:

1. IP address;
2. Location;
3. Hardware and software details;
4. Clicked links;
5. Content viewed; and
6. _____
_____.

Data Collected in a Non-Automatic Way

We may also collect the following data when you perform certain functions on our Site:

1. First and last name;
2. Email address;
3. Phone number;
4. Address;
5. Payment information;
6. Auto fill data; and

7. Customer Comments; including but not limited to services, speed test results, general comments etc...

This data may be collected using the following methods:

1. Registration Forms;
2. Subscriber Forms; and
3. Creating an account.

How We Use Personal Data

Data collected on our Site will only be used for the purposes specified in this Privacy Policy or indicated on the relevant pages of our Site. We will not use your data beyond what we disclose in this Privacy Policy.

The data we collect automatically is used for the following purposes:

1. To provide and operate the Products & Services;
2. To provide our Users with ongoing customer assistance and technical support;
3. To be able to contact our Visitors and Users with general or personalized service-related notices and promotional messages;
4. To create aggregated statistical data and other aggregated and/or inferred Non-personal Information, which we or our business partners may use to provide and improve our respective services; and
5. To comply with any applicable laws and regulations.

The data we collect when the user performs certain functions may be used for the following purposes:

1. Communication;
2. Statistics;
3. Marketing; and
4. To comply with any applicable laws and regulations.

Who We Share Personal Data With **Employees**

We may disclose user data to any member of our organisation who reasonably needs access to user data to achieve the purposes set out in this Privacy Policy.

Third Parties

We may share user data with the following third parties:

1. Wix.com.

We may share the following user data with third parties:

1. Our company is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our products and services. Your data may be stored through Wix.com's data storage.;
2. Data may also be stored on general Wix.com applications. They secure your data on secure servers behind firewalls.; and
3. Links clicked while using site.

We may share user data with third parties for the following purposes:

1. Targeted Advertising;
2. All direct payment gateways offered by Wix.com and used by our company adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council.; and
3. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers..

Third parties will not be able to access user data beyond what is reasonably necessary to achieve the given purpose.

Other Disclosures

We will not sell or share your data with other third parties, except in the following cases:

1. If the law requires it;
2. If it is required for any legal proceeding;
3. To prove or protect our legal rights; and
4. To buyers or potential buyers of this company in the event that we seek to sell the company.

If you follow hyperlinks from our Site to another Site, please note that we are not responsible for and have no control over their privacy policies and practices.

How Long We Store Personal Data

User data will be stored until the purpose the data was collected for has been achieved.

You will be notified if your data is kept for longer than this period.

How We Protect Your Personal Data

In order to protect your security, we use the strongest available browser encryption and store all of our data on servers in secure facilities. All data is only accessible to our employees. Our employees are bound by strict confidentiality agreements and a breach of this agreement would result in the employee's termination.

Our company is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our products and services to you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

While we take all reasonable precautions to ensure that user data is secure and that users are protected, there always remains the risk of harm. The Internet as a whole can be insecure at times and therefore we are unable to guarantee the security of user data beyond what is reasonably practical.

Your Rights as a User

Under the GDPR, you have the following rights:

1. Right to be informed;
2. Right of access;
3. Right to rectification;
4. Right to erasure;
5. Right to restrict processing;
6. Right to data portability; and
7. Right to object.

Children

We do not knowingly collect or use personal data from children under 16 years of age. If we learn that we have collected personal data from a child under 16 years of age, the personal data will be deleted as soon as possible. If a child under 16 years of age has provided us with personal data their parent or guardian may contact our privacy officer.

How to Access, Modify, Delete, or Challenge the Data Collected

If you would like to know if we have collected your personal data, how we have used your personal data, if we have disclosed your personal data and to who we disclosed your personal data, if you

would like your data to be deleted or modified in any way, or if you would like to exercise any of your other rights under the GDPR, please contact our privacy officer here:

dataprotection@grayshottgigabit.com

dataprotection@grayshottgigabit.com

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How to Opt-Out of Data Collection, Use or Disclosure

In addition to the method(s) described in the *How to Access, Modify, Delete, or Challenge the Data Collected* section, we provide the following specific opt-out methods for the forms of collection, use, or disclosure of your personal data specified below:

1. You can opt-out of the use of your personal data for marketing emails. You can opt-out by clicking "unsubscribe" on the bottom of any marketing email or updating your email preferences under "Your Account".

If you don't want us to process your data anymore, please contact us at dataprotection@grayshottgigabit.com.

Cookie Policy

A cookie is a small file, stored on a user's hard drive by a website. Its purpose is to collect data relating to the user's browsing habits. You can choose to be notified each time a cookie is transmitted. You can also choose to disable cookies entirely in your internet browser, but this may decrease the quality of your user experience.

We use the following types of cookies on our Site:

1. Functional cookies

Functional cookies are used to remember the selections you make on our Site so that your selections are saved for your next visits;

2. Analytical cookies

Analytical cookies allow us to improve the design and functionality of our Site by collecting data on how you access our Site, for example data on the content you access, how long you stay on our Site, etc;

3. Targeting cookies

Targeting cookies collect data on how you use the Site and your preferences. This allows us to personalise the information you see on our Site for you; and

4. Third-Party Cookies

Third-party cookies are created by a website other than ours. We may use third-party cookies to achieve the following purposes:

- a. To provide a great experience for your visitors and customers.;
- b. To identify your registered members (users who registered to your site).;
- c. To monitor and analyze the performance, operation and effectiveness of Wix's platform.;
- d. To ensure our platform is secure and safe to use. Some of the third party cookies are their uses are mentioned below;;
- e. XSRF-TOKEN: used for security reasons;
- f. hs: used for security reasons;
- g. svSession: Used in connection with user login;
- h. SSR-caching: Used to indicate the system from which the site was rendered;
- i. _wixCIDX: Used for system monitoring/debugging; and
- j. consent-policy: Used for cookie banner parameters.

Modifications

This Privacy Policy may be amended from time to time in order to maintain compliance with the law and to reflect any changes to our data collection process. When we amend this Privacy Policy we will update the "Effective Date" at the top of this Privacy Policy. We recommend that our users periodically review our Privacy Policy to ensure that they are notified of any updates. If necessary, we may notify users by email of changes to this Privacy Policy.

Complaints

If you have any complaints about how we process your personal data, please contact us through the contact methods listed in the *Contact Information* section so that we can, where possible, resolve the issue. If you feel we have not addressed your concern in a satisfactory manner you may contact a supervisory authority. You also have the right to directly make a complaint to a supervisory authority. You can lodge a complaint with a supervisory authority by contacting the Information Commissioner's Office (ICO) in the UK. For more information, visit ico.org.uk.

Contact Information

If you have any questions, concerns or complaints, you can contact our privacy officer, dataprotection@grayshottgigabit.com, at:

dataprotection@grayshottgigabit.com

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