

Last updated: 25 May 2018

1. Privacy statement

1.1 Utilities UK Limited t/a Direct Save Telecom ("DST") respect your right to privacy. At DST, we look after your personal information carefully. We adhere strictly to the requirements of UK data protection law and, in accordance with current law, we are registered on the public register of data controllers which is looked after by the Information Commissioner.

1.2 This Privacy Notice tells you who we are, how we collect, share and use information which identifies you ("personal information") and how you can exercise your privacy rights. This Privacy Notice applies to personal information that we collect through our website <https://www.directsavetelcom.co.uk> ("Website"), and but also to other personal information that you may provide to us when we provide you with our services or products. Please do take a moment to read this Privacy Notice so that you will understand how we use your personal information.

1.3 If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

2. What does DST do?

2.1 Direct Save Telecom is an independent telephone service provider and is a trading name of Utilities UK Ltd. Formed in 1999, it has established a solid customer base across the UK who are benefiting from great savings every month. In 2003 Direct Save Telecom became the core business of Utilities UK Ltd. In 2004 we became one of the first companies to take on Line Rental from BT Wholesale and offer a one bill solution.

3. What personal information does DST collect, and when?

3.1 There are many situations where you may provide data to us voluntarily or where it is collected automatically. Types of personal data we typically collect at different situations include:

- ▶ When you visit any of our websites:

we may collect certain information automatically from your device. For example, your IP address, device type, unique device identification numbers, browser type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed, links clicked, and information gathered by our cookies.

For more information about our websites and cookies, see section 7, 'Cookies and similar tracking technology'.

- When you become a customer of DST and purchase services from us:

your name, billing/delivery/supply address, orders and receipts, email, telephone number and a record of the products and services that you take from us. For your security, we'll also keep a record of your direct debit details (Card information is collected in a PCI compliant manner and is stored securely by a third-party payment processor, not by us).

- When you change any of your personal information on your 'My Account' portal, this will be saved to our system.

- Depending on the type of service you take, the data we require will differ:

Phone and broadband service: your call data records, such as who contacted you, who you contacted, when the contact took place, and call duration.

- When you contact us by any means (such as telephone, email, letter or SMS) with account queries or to complain about the service you have received:

the content of your communications with us, including emails, letters, webchats and phone calls. When we call you or you call our call centre, we will record any telephone calls that we have with you, to make sure that we are providing you with a good service and meeting all our regulatory and legal responsibilities.

- When you book an engineering visit (e.g. to install or repair a phone line or broadband service) or call with technical queries (e.g. because your broadband isn't working):

information about your home network or usage patterns in order to fix the fault.

- When you choose to complete any surveys we send you, we will receive the information you volunteer about your use of our goods and services.

- When you've given a third-party permission to share with us the information they hold about you. For example, your previous telephone and/or broadband supplier.

- Whenever any of our suppliers share information with us about the product or service you have purchased.

3.1.1 Sensitive Personal Data: some of the personal information that you provide to us may include sensitive personal information, such as health-related information or information about your race or ethnicity. You may provide this information to us voluntarily, for example during communications relating to customer account management. If we need to collect sensitive personal information from you, we will obtain your consent (or otherwise let you know our relevant legal grounds for collecting this information), at the point when we ask you to provide this information.

3.1.2 Data received from third parties: sometimes we will collect personal information from third parties. For example, gathering your current service provider numbers from third parties, validating and verifying your bank account. We use the information we receive from these third parties to provide you with our services and products, as otherwise necessary for our legitimate business reasons (for example, to verify that you are a suitable customer and that a direct debit can be taken from the bank account details provided to us), or to comply with law.

3.1.3 If you require more information on what we collect, how we handle sensitive personal data or what data we collect from third parties, please go to section 14, which shows you how to get in touch with us.

4. Why does DST process the personal information that it does?

Most commonly, we need personal information for one of four reasons: (1) to perform a contract; (2) where it is in our legitimate interests to do so; (3) where it is required to comply with legal or regulatory obligations; and (4) where you have provided your consent.

To understand more about these legal grounds for processing your personal data, please see section 6, 'Legal basis for processing personal information'

4.1 Where we use your personal data to carry out our contract(s) and provide products or services to you, if you don't give us the correct information, we might not be able to provide you with the product or service(s) you ordered from us. We need your personal information in order to do the following:

- ▶ Supply you with the services you selected and to tell you when we'll install your services;
- ▶ Instruct our wholesale partners to provide you with the services you have selected;

(when we do this, we still control your personal information and we have strict controls in place to make sure it's properly protected, see section 5 'Who does DST share my personal information with?');

- ▶ Send you product or service-information messages (for example, to inform you of any changes that might affect your service, like when infrastructure work may be planned or need to fix something);
- ▶ Manage your account (such as accurately billing you for the services and taking payment for services);
- ▶ Update our records about you (to ensure that they are up-to-date and accurate);
- ▶ Comply with our regulatory obligations;

- ▶ Detect fraud; and
- ▶ Check your identity.

4.2 We may also use this information for legitimate business purposes, such as:

- ▶ If you have not opted out, or where we are otherwise permitted by law, provide you with marketing communications about similar good and services;
- ▶ To improve our products and service offerings;
- ▶ Staff training;
- ▶ Recovery of bad debt; and
- ▶ Analysing business metrics.

We will tell you at the point of collection when we use your personal data for legitimate interest purposes (for more information see section 6, 'Legal basis for processing personal information').

4.3 We are a responsible supplier and we are required to comply with certain legal and regulatory obligations. One example of this is if you are a vulnerable customer.

If you tell us you have a disability or otherwise need support, we'll note that you are a vulnerable customer, but only if you give you permission or if we have to for legal or regulatory reasons. For example, if you told us about a disability we need to be aware of when we deliver our services to you, we have to record that information so we don't repeatedly ask you about it. We will also record the details of a Power of Attorney we have been asked to log against your account.

For more information about our regulatory and legal use of personal data, see section 5 'Who does DST share my personal information with?'

5. Who does DST share my personal information with?

5.1 We may disclose your personal information to the following categories of recipients:

- ▶ Third-party services providers who provide processing services to us (for example, to support the delivery of, provide functionality on or help to enhance the security of our services, products and Website) or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information. A list of our current group companies is available upon request;
- ▶ to subcontractors and third-party wholesale service providers who enable us to provide the underlying services to you. Equally, should you choose to move your services away, for example to a new service provider supplier,

information such as your telephone line details will be provided to that new supplier so they can begin to supply your new service;

- ▶ to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- ▶ to the independent distributor who signed you up as a customer, so that they know what services you receive from us (in order to compute their commission) and if you have not opted out from receiving marketing contact from us, that independent distributor may use your personal information in order to contact you to promote other DST goods and services to you;
- ▶ to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer that it must use your personal information only for the purposes disclosed in this Privacy Notice;
- ▶ to any other person with your consent to the disclosure.

6. Legal basis for processing personal information

6.1 The law on data protection sets out a number of different reasons for which a company may collect and process your personal data. Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it, including:

6.2 Consent

In specific situations, we can collect and process your data with your consent.

When collecting your personal data, we'll always make it clear to you which data is necessary in connection with a particular service.

6.3 Contractual necessity

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if we contract to provide you telephone and broadband, we'll need to collect your name and home address details in order to provide you said services at the correct address. However, we will normally collect personal information from you only where we need that personal information to perform a contract with you.

6.4 Legal compliance

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud to law enforcement agencies.

6.5 Legitimate interest

Sometimes, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

We carry out the following activities on the basis of legitimate interest:

- ▶ Marketing activities: you may choose not to receive marketing communications from us at the point of sale. If you do not opt-out from receiving marketing communications from us, you will be provided with communications about other similar utility and household services and benefits from time to time and we may also request you to complete customer satisfaction questionnaires. A facility is provided to enable you to opt-out of receiving marketing communications at any time (as instructed in the communication or simply by contacting customer services over the telephone).
- ▶ Carrying out credit checking (you can refuse to be credit checked, however, you may then have to pay a deposit or pay for the mobile phone handset upfront).
- ▶ Collection of debt: we may need to process your personal data in order to recover unpaid debt.
- ▶ Data Analytics: we analyse customer data in order to better understand our customer base and our service offering. We may also identify if you would be receptive to particular goods and services (ie tailoring our marketing to you) or whether you may benefit from our home movers service.

6.6 If you have questions about, or need further information concerning, the legal basis on which we collect and use your personal information, please contact us using the contact details provided in section 14, 'How to contact us'.

7.Cookies and similar tracking technology

7.1 We use cookies and similar tracking technology (collectively, "Cookies") on our websites to collect and use personal information about you, including to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies please see our Cookies Policy at <https://www.directsavetelecom.co.uk/CookiePolicy.pdf>

8.How does DST keep my information secure?

8.1 We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

8.2 We check your identity when you get in touch with us, and we follow our security procedures and apply suitable technical measures, such as encryption, to protect your information.

8.3 Specific measures we use include:

- a. Implementing design principles within our infrastructure (e.g. use of DMZ and firewalls);
- b. adopting security safeguards against attacks (e.g. internal and external monitoring of network traffic use and carrying out regular penetration tests); and
- c. security policies which provide working guidelines to our staff as well as enforce controls and procedures in line with data protection law and other industry-specific compliance requirements.

9.Data retention

10.1 We retain personal information we collect from you only for as long as is necessary for the purpose for which it was collected. In most cases, we will keep your personal information while you're one of our customers, and for seven years after. In other cases we'll store personal information for the periods needed for the purposes for which the information was collected or for which it is to be further processed and sometimes we'll keep it for longer if we need to by law.

10.2 At the end of the retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

10.Automated decision making

10.1 In some instances, our use of your personal information may result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you.

10.2 Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review. For example, we may use automated decisions to analyse your credit worthiness and verify your identity when we process your application for certain products and services.

10.3 When we make an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision. You can exercise this right by contacting us using the contact details provided under the How to contact us heading below.

11. Your data protection rights

11.1 You may have the following data protection rights:

- ▶ If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the How to contact us heading below.
- ▶ In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the How to contact us heading below.
- ▶ You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you, or texting "STOP" to the number listed in the text messages we send. If you would prefer to opt-out over the telephone, or to opt-out of other forms of marketing (such as postal marketing) then please contact us using the contact details provided under the How to contact us heading below.
- ▶ Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- ▶ You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for Information Commissioner's Office are available here <https://ico.org.uk/global/contact-us/>.)

11.2 We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

12. Updates to this Privacy Notice

12.1 We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by data protection law.

12.2 You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

13.Links from our Website to other sites

13.1 Please be aware that our site may provide access to other websites by linking to them. We are not responsible for the data policies (including data protection and cookies), content or security of these linked web sites.

14.How to contact us

14.1 If you have any questions or concerns about our use of your personal information, please contact our data protection officer using the following details: dpo@directsave.co.uk.

14.2 The data controller of your personal information is Utilities UK Limited t/a Direct Save Telecom, which is registered with the ICO with registration number Z8714525.