

### 1 Who are we?

- 1. This is the privacy policy of Stream Networks Limited, incorporated and registered in England and Wales. Registered office: Eden House, Two Rivers Business Park, Witney, Oxfordshire, England, OX28 4BLRegistered No: 06229310. We are responsible for your personal data where we operate as a data controller. Stream Networks provides telephony, broadband, fibre, ethernet, cloud and security services.
- 2. Members of the senior management team have designated authority and are responsible for all issues relating to the protection of personal data. For matters relating to data protection contact can be made in writing to:

Data Protection, Stream Networks Ltd, 2 Riverside House, Mill Lane, Newbury, RG14 5QS

3. This privacy policy replaces all previous versions and applies from 19<sup>th</sup> July, 2024.

#### 2 Who does this Privacy Policy apply to?

2.1 This privacy policy applies to:

- a. Customers;
- b. Prospective customers;
- c. Individuals that use our websites and portals;
- d. Former customers;
- e. Nominated users or individuals acting under a power of attorney or on behalf of an Organisation;
- f. Shareholders.

2.2 Our services are not intended for children, unless we expressly state otherwise, and we do not knowingly collect or process personal data relating to children, or anyone aged under 18 years.

2.3 It is important that the personal data we hold about you is accurate and current and we ask that you update us of any changes to your information so that we can continue to manage our relationship and safeguard your information.

2.4 Stream Networks may issue privacy notices from time to time, informing you about the personal information that we collect and hold relating to you, how you can expect your personal information to be used and for what purposes.

#### 3 What information do we collect?

3.1 Personal data is any information that can identify a natural person. We may collect, use, store and transfer different categories of personal data to enable us to deliver our services, as follows:



- . Data about your Identity could include first name, last name, title, contact details, date of birth and gender;
- . Data about your or end user contact details including service address, correspondence/billing address, address, landline telephone number and mobile phone number;
- . Financial data including bank account details and credit rating;
- . Data relating to a transaction including details about payments to and from you and about the products and services that you have purchased or may purchase from us;
- . Technical data including IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, webmail emails, online chat logs and other information on the devices you use to access our services;
- . Data about your portal profiles including your Cascade portal username and password, your interests, preferences, feedback and survey responses;
- . Data about your usage of our products and services including the amount of time you spend online, websites you visit, or when you make a call, the number, destination and length of your call;
- . Data relating to your marketing and communications choices including what method you would like to receive marketing and how frequently.

3.2 We may also collect and use non-personal data such as statistical or demographic data. This data may be derived from your personal data but is not considered personal data as this data cannot identify you.

#### 4 How do we collect information?

4.1 Information you give us:

- . When you place an order with us for any of our services we will need certain information to process your order.
- . When you contact us to discuss your services, or as a representative for your organisation, we may ask for certain information to be able to confirm your identity, check our records and answer your questions quickly and accurately.
- . If you take part in any trials, complete any surveys, or enter any competitions we may ask for information about you, which we will make clear to you at the time and for the purpose we will be using this information.
- . If you wish to attend, or have attended, an event, or wish to receive an e-newsletter newspaper or industry white paper.
- . In addition, we may combine your data with 3<sup>rd</sup> party data product and service availability information or exchange information.



4.2 Information we automatically collect

We will automatically collect information:

- . when you use our services;
- . when you visit our websites or use our mobile applications, we may collect and process information about your usage of these by using "cookies" and other similar technologies to help us make improvements to the websites and to the services we make available. For more information, please refer to our cookie policy at
- . When you use applications created by us and, where applicable, have requested or consented to location services, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as search results, and other personalised content. Most mobile devices allow you to turn off location services. Our mobile application does not collect precise information about the location of your mobile device.

4.3 Information we receive from other sources

We may receive personal data about you from third parties, publicly available sources and other entities and companies affiliated with Stream Networks in the following categories:

- . companies contracted by us to help us provide services to you;
- . companies we are in contract with to help us provide services to you;
- . other telecommunications operators when transferring services;
- . marketing organisations;
- . credit reference agencies or fraud prevention agencies.

#### 5 How do we use information?

5.1 The information we collect helps us to better understand what you need from us and to improve the provision of our services to you.

- 5.2 We use the information collected for example to:
  - . verify your identity when you use our services or contact us;
  - process your enquiries, orders or applications, for example when assessing an application, we may use automated decision-making systems and ensure we deliver communications in a format required by you;
  - . carry out credit checks and to manage your accounts;



- monitor, record, store and use any telephone, e-mail or other electronic communications with you for training purposes, so that we can check any instructions given to us and to improve the quality of our customer service, and in order to meet our legal and regulatory obligations;
- . where you have agreed, provide you with information about other Stream Networks communications offers or products which you may be interested in;
- . to tell you about changes to our websites, services or terms and conditions;
- carry out any data and/or marketing analysis, profiling or create statistical or testing information to help us personalise the services we offer you and to understand our users/customers better, understand what our users/customers want and how they use our products and services;
- . recover any monies you may owe to us for using our services;
- . analyse our services with the aim of improving them, or to enable fault repair;
- . prevent or detect a crime, fraud or misuse of, or damage to our network, and to investigate where we believe any of these have occurred;
- monitor network traffic from time to time for the purposes of backup and problem solving, for example our automated system may monitor email subjects to help with spam and malware detection; and
- . to enable on site security to be maintained and to ensure we can contact you in the event of an emergency.
- . we use third party information in order to support you to manage your customer base and let you know about pre-scheduled work or incidents. Also to allow us to check that products and services are available to you.

5.3 Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law.

5.4 We may supplement the information directly collected by us with data from third parties to further improve the services or products we offer customers.

### 6 When will we share your data with others?

6.1 We may need to share your information with organisations outside Stream Networks e.g. to help us provide our services to you.

6.2 The categories of non-Stream Networks parties that we would share your details with are:

- . Third party suppliers who help Stream Networks to perform our services;
- . Professional advisors;
- . Law enforcement agencies;



- . Other companies as part of the process of selling one or more of our businesses or part of those businesses; and
- . Regulators (such as Ofcom or the ICO).

6.3 Where we share your information with third parties they are required to follow our express instructions in respect of the use of your personal information and they must comply with all applicable UK data protection laws to protect your information and keep it secure.

6.4 Where we use suppliers to assist us in providing the services you are enjoying, you might be directed to their sites and as such please ensure you read their privacy and cookie policies.

### 7 Protecting information

7.1 We take protecting your data seriously and will do our utmost to employ appropriate organisational and technical security measures to protect you against unauthorised disclosure or processing.

7.2 Unfortunately we cannot guarantee the security of transmitting information via the internet. We have tried to create a secure and reliable website and applications for our users in line with industry standards. However, we have no responsibility or liability for the security of personal information transmitted via the internet.

### 8 Why do we process your data?

8.1 We process each type of personal data for one the following reasons:

- . We need to process the data under our contract with you for our services.
- . We have a legitimate interest as a business in in processing your data.
- . We have a legal obligation to process the data; or
- . We have your consent (which you can withdraw at any time).
- . To protect the vital interests of an individual.

8.2 If you don't provide us with the data, we need then we may not be able to perform our contract with you and may need to terminate the contract

### 9 Transfers of data outside of the United Kingdom

9.1 The third parties we share our data with may be outside of the United Kingdom in countries that do not always have the same standard of data protection laws as the UK. However, we will have a contract in place to ensure that your information is adequately protected, and we will remain bound by our obligations under applicable UK data protection laws even when your personal information is processed outside of the UK. In these instances, will take measures to protect your data including security reviews of the



organisations, processing agreements, contractual clauses, or International Data Transfer Agreements and assessments.

#### 10 How long do we hold your information for?

10.1 Unless there is a specific regulatory or legal requirement for us to keep your information longer, we will keep your information for as long as it is necessary for the purpose for which it was collected.

10.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### 11 Your rights

11.1 As a data subject you have a number of personal rights under data protection laws in relation to your personal data. These are:

- . Subject access requests You have a right to access personal data that we hold as a data controller.
- . Right to be forgotten In certain circumstances you have a right to request that your personal data be erased from the systems within our control.
- . Rectification You have a right to correct your personal data that we hold as a data controller.
- . Withdraw consent Where we have offered you the right to consent to giving us your data, for instance with your marketing preferences, you have the right to withdraw your consent at any time.
- . Objection and restriction of processing In certain circumstances, you have a right to object to or request we restrict our processing of your personal data.
- . Right to port You have a right to receive certain information about you in a machine-readable format.

11.2 If you would like more information about these rights or how to apply them, please contact the team by emailing <u>data.protection@stream-networks.co.uk</u>

#### **12** Complaints and incidents

12.1 If you would like to make a complaint about our use of the personal data you should contact our Data Protection Team at the details above. If we have not resolved your complaint, you can contact the UK data protection regulator, the Information Commissioner's Office (ICO) (www.ico.org.uk). We would, however, appreciate the chance to deal with your



concerns before you approach the ICO so please contact us in the first instance. ICO website: <u>https://www.ico.org.uk</u>

12.2. In the event of a data incident, we will investigate and where required we will liaise with affected customers and the Information Commissioner's office without undue delay.