

## Data & Privacy Policy

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Opus takes your privacy very seriously and Opus will comply with the obligations imposed on us by the applicable Data Protection Legislation.

The Data protection Legislation includes the UK Data Protection Act 1998, the General Data Protection Regulation ((EU) 2016/679) (GDPR) and any national laws, regulations and secondary legislation, as amended or updated from time to time, in the UK including any subsequent legislation to the GDPR or the Data Protection Act 1998.

We shall use personal information provided by you in accordance with the provisions of our Master Terms Agreement and in accordance with this policy, our terms of use and our use of cookies.

Our Privacy Policy will be reviewed from time to time to take account of new laws and technology and any changes to our operational processes and any amendments to this policy will be incorporated in an updated version. Any information we hold will be governed by our most recent Privacy Policy.

### **Opus is registered with the Information Commissioner's Office as:**

Opus Business Systems Limited t/a Opus Telecoms - Z2986023

Opus Network Services Limited t/a Opus Networks – ZA365540

Opus Digital Solutions Limited t/a Opus Digital – ZA365571

Opus Technology Limited – ZA365559

## **Scope**

This policy applies to anyone who uses our websites (including our portal) or who buys or uses or has legitimate interest in any of the services provided by Opus formed of the above Opus companies.

## **Use of Personal Information**

Opus needs to collect and use certain personal information to be able to offer its range of products and services.

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to answer your enquiries
- Where we need to perform the contract we enter into with you and to process payments
- Where we need to comply with a legal or regulatory obligation
- Where it is necessary for our legitimate interests (or those of a third party) and when your interests and fundamental rights do not override those interests

With your consent, we may also use your information:

- To advertise our products and services to you
- To optimise your experience on our website and portal

## **What Information we Collect**

The type of information we collect may include (but is not limited to):

- Contact information: your name, address, telephone numbers, email addresses and other contact information
- Payment information
- Date of birth
- Video Images
- IP addresses
- Account information including login details
- Areas of the website used and visited, details of transactions you carry out through our website and the fulfilment of those transactions and links to and from third party websites
- Information from external sources such as credit reference and identity verification agencies. Periodically we may ask you to voluntarily complete surveys to provide us with information for our marketing or research purposes, although you do not have to respond to them

With specific reference to our website we may collect the following information:

- a) Information about your computer and about your visits to and use of this website including your IP address, geographical location, browser type, referral source, length of visit and number of page views
- b) Information relating to any transactions carried out between you and us on or in relation to this website
- c) Information that you provide to us for the purpose of registering with us
- d) Information that you provide to us for the purpose of subscribing to our website services, email notifications and/or newsletters
- e) Any other information that you choose to send to us

Most browsers allow you to refuse to accept cookies. For example, in Internet Explorer you can refuse all cookies by clicking “Tools”, “Internet Options”, “Privacy”, and selecting “Block all cookies” using the sliding selector.) This will, however, have a negative impact upon the usability of many websites.

## **Why we Collect Information**

Opus will use your information for the following purposes:

- to open and maintain your customer account/s with us
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- to confirm your identity and credit worthiness
- to purchase products as part of our service
- to install products and services remotely or on premises
- to maintain your equipment
- to answer queries
- to provide technical support
- to provide data storage including cloud storage
- to provide domains and licenses
- to provide security certificates
- to provide consultancy services
- to review job applications
- for security of our staff and business
- to ensure that content from our website is presented in the most effective manner for you and for your computer
- to provide you with information, products or services that you request from us or which we feel may be of interest to you
- to enable us to provide you with the products and services that you have requested from us and otherwise to perform our legal obligations to you
- to manage your customer portal
- for training purposes, quality assurance or to record details about the products and services you order from us
- to satisfy and meet our legal and regulatory requirements
- to allow you to participate in interactive features of our services, when you choose to do so
- to notify you about changes to our products and services

If you have provided your explicit consent and unless and until you advise us to the contrary, we will also communicate with you about relevant information and opportunities relating to existing and new products and services which we consider suitable for you.

## **How we Collect Information**

We will collect information via the following means:

- when using our website, through filling in forms and registering to use our website and/or the customer portal and through active use of the customer portal. This includes reporting a problem with our website.
- when making an enquiry for our services through filling in the website form, calling us or emailing us
- when applying for a job
- when discussing or placing an order to subscribe to our products and service

- when making use of our services
- when we take over services from a previous provider you transfer from
- when you visit our offices (CCTV)
- through call recording
- through third party suppliers
- through our web chat application

## **Cookies**

A cookie consists of information sent by a web server to a web browser and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may use both “session” cookies and “persistent” cookies on the website. We will use the session cookies to: keep track of you whilst you navigate the website.

We will use the persistent cookies to enable our website to recognise you when you visit.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users’ computers. The information generated relating to our website is used to create reports about the use of the website. Google stores this information.

## **Sharing of Information**

In the standard operation of our business and to enable us to provide products and services to our customers, we may disclose your personal information to the following (who may be within or outside the European Economic Area):

- our associated companies including any member of the Opus companies
- successors in title to our business
- our third-party service providers
- professional advisors
- credit agencies
- any organisation or person expressly instructed by you
- any relevant regulatory, governmental or law enforcement authority as required by law
- third parties necessary to provide the products and services requested by you or necessary to protect the rights, property, or safety of our other customers, our employees, agents, consultants, contractors or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

We require that organisations outside of our Group of companies who handle or obtain personal information as service providers, acknowledge the confidentiality of this information, undertake to respect any individual’s right to privacy and comply with the Data Protection Legislation and this

policy.

## **Security of Information**

We take the safeguarding of your data very seriously. All personal information in our possession is held securely. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from [compliance@opus-telecoms.co.uk](mailto:compliance@opus-telecoms.co.uk)

We do not currently store or transfer your personal data outside the European Economic Area, but should we do so in the future we will ensure our Suppliers deal with the data with in GDPR process and protocol. By providing your data to us, you agree to this transfer and storage. However, we will ensure that reasonable steps are taken to protect your data in accordance with this privacy notice.

Special measures such as access restrictions are in place to ensure the security of sensitive personal data.

In line with GDPR, we have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **Your Duty to Inform us of Changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

## **Data Retention**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a customer of Opus we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

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## **Your Rights of Access, Correction, Erasure and Restriction**

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are improperly processing your personal information for direct marketing purposes
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- Request the transfer of your personal information to another party

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [compliance@opus-telecoms.co.uk](mailto:compliance@opus-telecoms.co.uk) in writing.

### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [compliance@opus-telecoms.co.uk](mailto:compliance@opus-telecoms.co.uk). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes

you originally agreed to, unless we have another legitimate basis for doing so in law.

## **Questions and Complaints**

If you have any questions concerning our Privacy Policy, would like to change your personal information, or would like to make a complaint concerning any action of ours which you consider is in breach of our policy please contact our Compliance Manager directly at [compliance@opus-telecoms.co.uk](mailto:compliance@opus-telecoms.co.uk).

We would hope to be able to deal with any complaint you may have to your satisfaction, but you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## **Policy amendments**

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