



Privacy Notice May 2018

In the normal course of business HighNet may collect and process personal data of individuals acting on behalf of their employer or other business entity. This personal data may include names, email addresses, telephone numbers, work addresses, job title or other departmental information relating to business activities. This data is required to enable HighNet to fulfil its contractual obligations in delivering telecommunications services to its customers, and to meet various regulatory and legal requirements regarding the provision of telecommunications services. This personal data may also be used by HighNet to enable customer satisfaction surveys, with the sole purpose of improving the services provided by HighNet to its customers. It may be collected on order forms, on website forms, by email or by phone and will be stored electronically.

Personal data may be shared with HighNet employees and third parties to enable the provisioning and support of HighNet products and services, but only when it is necessary to do so. These third parties may include HighNet's suppliers (such as Openreach and CityFibre) and HighNet's channel partners. Personal data may be shared with third parties for marketing purposes, but only with those who are contracted by and working directly on behalf of HighNet. Personal data will not be stored by HighNet outside of the UK.

HighNet will use personal data to provide information to customers about current or future products and services which are relevant to them. This may include information concerning interruptions or changes to services, and information concerning fraud alerts, DDoS protection or other security matters.

Personal data will be retained for the duration of the customer contract and for any further period during which HighNet provides services to the customer. Thereafter, personal data will be retained to meet legal or regulatory requirements and for marketing purposes to enable us to provide information about products and services which may be of benefit and interest to you. Personal data which has been provided during the course of enquiries about HighNet products and services (by persons and business entities as potential customers) may also be retained for marketing purposes as above. Whenever we process data for these purposes we will ensure that we always keep your personal data rights in the highest regard and take into account all of your data protection rights under any and all current UK legislation.

HighNet uses call recording for training and monitoring purposes, and this may include calls made to and from mobile devices. Call recordings may also be used to support the handling of customer complaints or disputes. Call recordings are stored on secure servers in the UK and access to them is restricted to those staff whose roles require it.

CCTV is used at HighNet's offices for maintaining the security of property and premises and for preventing and investigating crime, it may also be used to monitor staff when carrying out work duties.

For these reasons the information processed may include visual images, personal appearance and behaviours. This information may be about staff, customers and clients, offenders and suspected offenders, members of the public and those inside, entering or in the immediate vicinity of the area under surveillance. Where necessary or required this information is shared with the data subjects

themselves, employees and agents, services providers, police forces, security organisations and persons making an enquiry. Our full CCTV Policy is available on our website.

The processing of personal data as described in this privacy policy is on the basis of legitimate interest. The commercial interests of HighNet and those of our business customers require us to process this data in order to manage the delivery and support of services provided. HighNet's commercial interests also require us to process personal data in order to manage marketing campaigns to customers and to potential customers. Personal data will not be used in any way which a customer or potential customer could not reasonably expect, and it will not be used in any way which could cause harm or be found intrusive.

You may withdraw your consent to our storage or use of some or any of your personal data at any time. This can be done by email to info@highnet.com or in writing to Data Protection Officer, HighNet, Cradlehall Business Park, Inverness, IV2 5GH. Please note that withdrawal of consent may adversely affect HighNet's ability to provide telecommunications services to you, and that HighNet may be required to share some details such as the address of your business premises to enable inclusion within the Emergency Services Database or to meet other legal or regulatory standards.

If you have any questions about HighNet's storage or processing of personal data please contact the Data Protection Officer as above. Should you have any concerns about HighNet's storage and processing of personal data which HighNet have not resolved to your satisfaction you can raise this with the Information Commissioner's Office ico.org.uk/concerns.