

## swcomms - Privacy policy

This privacy policy sets out the basis on which any personal information **swcomms** may collect from you, or you provide to us, will be processed and used by us. It also describes how we use cookies and how you can manage them.

When we refer to "we", "our", "**swcomms**" or "us" we are referring to South West Communications Group Limited (Company No. 01863384) and its subsidiaries or any of them as the context so requires.

Any links from our website to other websites are provided merely for your convenience and do not imply our endorsement of the content or the provider. If you follow a link to any of these websites, you do so at your own risk and we do not accept any responsibility or liability for the content of such websites.

South West Communications is registered to process data under the Data Protection Act 2018 and our registration number is Z6929697.

#### Information we may collect from you

In using our website or by registering for any of the products and services we offer through it, you are confirming to us that you understand and accept that your personal information may be used by us in the manner described below.

**swcomms** may collect and process the following data about you:

- information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our website, subscribing to our products and services, posting material or requesting further products and services. We may also ask you for information when you report a problem with our website;
- if you contact us, we may keep a record of that correspondence (including email and phone conversations);
- your name, address, telephone numbers, email address and other information which you supply to us;
- we may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them;
- details of transactions you carry out through our website and the fulfilment of those transactions; and
- details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data,



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the resources that you access.

#### Uses made of the information

If your complaint is not resolved to your satisfaction after this procedure, you can escalate the complaint to our Customer Relations Manager, and then ultimately the Managing Director.

We may use information held about you in the following ways:

- 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, where you have consented to be contacted for such purposes;
- to audit the usage of our website;
- to carry out our obligations arising from any contract entered into between you and us;
- 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; and
- to notify you about changes to our products and services.

Unless prescribed by law, we will retain your personal information for no longer than is necessary for the purposes for which the personal information was collected or for which it is to be further processed by us.

#### Disclosure of your information

We may disclose your personal information to any member of the Focus group of companies.

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation, or in order to enforce or apply our terms and conditions and other agreements; or to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.



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### Your rights

You have a right of access to personal information which we may hold about you. To have inaccurate information about you corrected or to request we stop using your personal information for marketing purposes, access requests should be put in writing and addressed to marketing@swcomms.co.uk.

#### **Contact information**

If you have comments or any questions about our Privacy Policy please contact marketing@swcomms.co.uk.

#### **IP addresses**

We may collect information about your computer, including where available your IP address, operating system and browser type for system administration. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

#### **Cookies Policy**

We use necessary cookies to help our site function. We also like to set optional cookies to help us improve content quality, analytics and accessibility.

#### Strictly necessary and User Experience Cookies

Cookie: PHPSESSID

Stores message when a form is submitted that can be displayed on a different page. For example, if an enquiry form is completed incorrectly, a message will be stored and presented to the user to indicate the errors in the submission. No personal information is stored in this cookie.

#### **Analytics Cookies**

Service: Google Analytics



Cookie(s): \_\_utma, \_\_utmb, \_\_utmc, \_\_utmz

Purpose:

First-Party Cookies used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where the visitors have come to the site from and the pages they have visited.

If you would like to opt out of Google Analytics cookies, you can <u>find out more on</u> Google's website

#### **Further Cookie Information**

If you'd like to learn more about cookies in general and how to manage them, visit aboutcookies.org (opens in a new window – please note that we are not responsible for the content of external websites).

#### Your rights

You have a right of access to personal information which we may hold about you. To have inaccurate information about you corrected or to request we stop using your personal information for marketing and other purposes, access requests should be put in writing and addressed to:

The Compliance Officer, swcomms, Communications House, Moor Lane, Sowton, Exeter EX2 7JF.

#### **Contact information**

If you have comments or any questions about our Privacy & Cookies Policy please **swcomms**.

We regularly review our policies and any changes will be posted on our website. This Privacy & Cookies Policy was last reviewed and updated in September 2019.

#### Marketing

We use necessary information to help build targeted marketing campaigns to customers showing interest in products and services related our offerings.



# When will we use your personal and/or business information for marketing purposes?

• To keep you informed of South West Communications Group

products and services via online advertising, telephone, email or direct mail

- To undertake targeted online advertising
- To send you product updates and service-based communications
- To improve our website, products and services
- To carry out marketing research and analysis
- For administrative purposes

#### When will we send you marketing?

- When we have your permission, we will send you marketing communications from **swcomms**
- We respect your choice in terms of which marketing communications you receive and if you no longer wish to receive marketing communications from **swcomms**, you can opt out at any time
- If you decide you would prefer not to receive marketing communications, please email us on marketing@swcomms.co.uk
- Alternative, each marketing communication we send by email will also have an unsubscribe option which will allow you to stop receiving further marketing emails
- Please note, if you advise us that you do not wish to be sent further marketing communications, you will still receive service update communications or notifications relating to any existing services you have with **swcomms**
- If you opt out of marketing communications, please note we will retain your personal information for the purposes of indicating that you do not want to receive marketing communications
- We will never share or sell your personal information with third parties unless you have specifically agreed for us to do so on your behalf

#### **Third-Party Processors**

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

"Digital Marketing Service Providers



We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the complaint processing of personal information. Our appointed data processors include:

(i) Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: http://sopro.io. Sopro are registered with the ICO Reg: ZA346877 their data protection officer can be emailed at: <u>dpo@dopro.io</u>"