



## 1. Introduction

Welcome to Zen Internet Limited's Privacy Notice.

Zen respects your privacy and is committed to protecting your personal information.

This document will tell you how we look after any personal information we collect from you or that you provide to us. It will also tell you about your privacy rights and how the law protects you.

Please read it carefully to understand our views and practices regarding your personal information.

## 2. Important information and who we are

### PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Zen collects and processes your personal data through your use of this website and our services, which includes any data you may provide through this website, over the phone or by email when you sign up to our newsletter, purchase a product or service or take part in a competition.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

### CONTROLLER

Zen Internet Limited is the controller and is responsible for your personal data (referred to as "Zen", "we", "us" or "our" in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact [dataprotection@zeninternet.co.uk](mailto:dataprotection@zeninternet.co.uk) using the details set out below.

## CONTACT DETAILS

Our full details are:

<b>Legal entity</b>	<b>Zen Internet Limited</b>
<b>Contact</b>	Data Protection Officer
<b>Email address</b>	<a href="mailto:dataprotection@zeninternet.co.uk">dataprotection@zeninternet.co.uk</a>
<b>Postal address</b>	Sandbrook Park Sandbrook Way Rochdale OL11 1RY
<b>Telephone number</b>	01706 902 000

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 ([www.ico.org.uk](http://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.

### CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

Any changes to this privacy notice will be published on our website.

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

### THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### 3. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

<b>IDENTITY DATA</b>	First name, maiden name, last name, username or similar identifier, title and date of birth.
<b>CONTACT DATA</b>	Billing address, delivery address, email address and telephone numbers.
<b>FINANCIAL DATA</b>	Bank account and payment card details.
<b>TRANSACTION DATA</b>	Details about payments or communications to and from you and other details of products and services you have purchased from us.
<b>TECHNICAL DATA</b>	Internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
<b>PROFILE DATA</b>	Your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
<b>USAGE DATA</b>	Information about how you use our website, products and services.
<b>MARKETING AND COMMUNICATIONS DATA</b>	Your preferences in receiving marketing from us and your communication preferences.
<b>IMAGE DATA</b>	CCTV and Automatic Number Plate Recognition image data for staff, tenants and visitors to Zen's Sandbrook Park headquarters.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can identify you in any way, we treat the combined data as personal data and it will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We do not collect any information about criminal convictions and offences.

#### **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform that contract (for example, to provide you with services). In this case, we may have to cancel a service or order you have with us and we will notify you of this at the time.

#### 4. How is your personal data collected?

We use different methods to collect data from and about you including through:

##### DIRECT INTERACTION

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

##### AUTOMATED TECHNOLOGIES OR INTERACTIONS.

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

##### THIRD PARTIES OR PUBLICLY AVAILABLE SOURCES.

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from analytics providers such as Google based inside and outside the EU;
- Contact, Financial and Transaction Data from providers of technical, payment and installation services such as Equifax or BT based inside and outside the EU.
- Identity and Contact Data from data brokers or aggregators based inside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

#### 5. How we use your personal data

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

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third-party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email, SMS, post or telephone. We will always ask for your express opt-in consent before we do so and you have the right to withdraw consent to marketing at any time by following the opt-out links on any marketing message we send to you or by [contacting us](#) at any time

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST
<b>To register you as a new customer</b>	(a) Identity (b) Contact	Performance of a contract with you
<b>To process and deliver your order including:</b> <b>(a) Manage payments, fees and charges</b> <b>(b) Collect and recover money owed to us</b>	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
<b>To manage our relationship with you which will include:</b> <b>(a) Notifying you about changes to our terms or privacy notice</b> <b>(b) Asking you to leave a review or take a survey</b> <b>(c) Providing information to you to meet our regulatory obligations</b>	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
<b>To enable you to partake in a prize draw, competition or complete a survey</b>	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
<b>To ask you to complete surveys sent by our third-party service providers</b>	(a) Identity (b) Contact	Necessary for our legitimate interests (to understand and improve the overall service level provided to

		our customers and to monitor how our third parties are performing against their service obligations)
<b>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</b>	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
<b>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</b>	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
<b>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</b>	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
<b>To make suggestions and recommendations to you about goods or services that may be of interest to you</b>	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
<b>To monitor activity on and around Zen's Rochdale headquarters using CCTV</b>	(a) Identity	Necessary for our legitimate interests (prevention of crime, safety and security of staff, visitors and building tenants)
<b>To assist Zen with car park access at our Rochdale headquarters using ANPR</b>	(a) Identity	Necessary for our legitimate interests (to assist Zen with car park access and management)

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact [dataprotection@zeninternet.co.uk](mailto:dataprotection@zeninternet.co.uk) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table above.

## MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

- **Promotional offers and marketing communications from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have purchased services or requested information from us. Examples of information requests may include requesting a quote, adding items to your online basket or making enquiries over the telephone or if you provided us with your details when you entered a competition or registered for a promotion.

- **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company for marketing purposes.

- **Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message we send to you or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us for the provision of services by us to you or other transactions between us and you.

- **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

- **Change of purpose**

We will only use your personal data for the purpose we collected it for, unless we consider that we need to use it for another reason that is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact [dataprotection@zeninternet.co.uk](mailto:dataprotection@zeninternet.co.uk).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 6. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 5 above.

### EXTERNAL THIRD-PARTIES

- Service providers based inside and outside the EU who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.
- Third-parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. We may also seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Market Research Companies when we ask you to complete surveys or provide other feedback on our services or our third party's services.
- Fraud Prevention and Credit Reference Agencies to enable us to protect our rights, property, customers, or others.
- Specific third parties such as BT and other Service Providers we use to provide services to you, including the migration of services via the One Touch Switching process.
- Law enforcement agencies, for the prevention of crime.

We require all third-parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

A list of the third parties we share your personal data with in relation to our products and services can be found here.

### INTERNATIONAL TRANSFERS

Occasionally our external third-parties may be based or operate outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure the same degree of protection is afforded to it by ensuring those third-parties enter into a contract with us which obliges them to give your personal data the same protection it has within the EU.

Please contact us if you want further information on how your personal data may be transferred out of the EEA.



## 7. Data security

We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third-parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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

## 8. Data retention

### HOW LONG WILL WE USE YOUR PERSONAL DATA FOR

We retain personal information about our customers (including Contact, Identity, Financial and Transaction Data) for legal and tax purposes as well as our accounting and reporting requirements.

To determine the appropriate retention period for personal data, we will consider the amount and nature of the personal data, the potential risk of harm any unauthorised use or disclosure may cause, the purpose for which we process your personal data and whether we can achieve that purpose through other means. We also consider any applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are processing it in accordance with the law.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third-party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. As we only rely on consent for marketing purposes, if you withdraw your consent, we will still be able to provide products and services to you.  
If you wish to exercise any of the rights set out above, please contact [dataprotection@zeninternet.co.uk](mailto:dataprotection@zeninternet.co.uk).

## NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you to confirm your request in writing by email for example or for further information in relation to your request to speed up our response.

## TIME LIMIT TO RESPOND

We aim to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Glossary of terms

<b>Legitimate Interest</b>	The interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting <a href="mailto:dataprotection@zeninternet.co.uk">dataprotection@zeninternet.co.uk</a> .
<b>Performance of Contract</b>	Processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
<b>Comply with a legal or regulatory obligation</b>	Processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.