Manx Telecom Employee Privacy Notice

Under the Data Protection laws, we (Manx Telecom Limited) are classified as a Data Controller, which means we determine the purposes and means of processing your personal information.

We take the privacy of your information very seriously and ask you to read this Privacy Notice carefully as it contains important information on:

- The personal information we collect about you;
- What we do with your information;
- Who your information might be shared with;
- Your rights as a Data Subject;

What information do we collect?

The following information is collected from you when completing forms on our websites or by contacting us (phone, email or in writing). This information may include:

- Your name;
- Current address and proof of address;
- Proof of ID;
- Date of birth;
- Email address;
- Fixed and mobile and telephone numbers;
- Financial credit and debit card information;

The above information may also be provided to us when:

- You open an account, request quotations, and register for email alerts;
- You request literature and sign-up for newsletters;
- If you apply for a job with us or have worked with us in the past;

When you visit our websites, we may automatically collect the following information:

- Technical information, used to connect your computer to the internet; i.e. IP addresses;
- Login information, your geographic location, browser type and version;
- Operating system information;
- Information about your visit;
- Searches made on our sites, page response times, download errors, length of visits;
- Page interaction information (such as page scrolling, mouse clicks, movements, keyed text);
- Methods used to browse away from the page ;

What do we use your information for?

Obtaining your information is necessary for us to provide you with the services you require, and to comply with obligations as set out in contracts with you.

We will only process your personal information to provide you with applicable service and we maintain a record of your contract or consent.

We will only e-mail or phone you about our products and services if you are an existing customer or we have an accurate record of your recent and freely given consent to do so.

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You can withdraw your consent at any time by phoning 01624 624624 or emailing products@manxtelecom.com.

There are times when it is not practical to obtain and record consent. At those times, we will only process personal information if that processing would meet a legal obligation. In which case we would only process in accordance with the law's strict rules on processing.

Sharing your information

We may have to share your personal data with:

- Other companies within our group
- Approved third parties who provide us with services to enable us to deliver services to you
- Our professional advisors or by third parties who provide us with services which we use internally to administer our services.
- Regulators and other authorities for the purposes of prevention, detection and prosecution of criminal offences or issues relating to national security or, where we are required to do so in the event of a national emergency to comply with other legal or regulatory requirements

Some external third parties (for example our suppliers) are based or have offices outside the European Economic Area ('EEA'); if they process your data as part of our relationship with them, it may mean that your personal data is transferred outside the EEA. Where this occurs, we will ensure that an adequate level of protection is applied in accordance with the Data Protection Laws.

How long do we retain your information?

We will ensure personal data shall not be kept for longer than is necessary. This includes:

- Reviewing the length of time personal data is retained
- Reviewing and considering why the information is retained
- Securely deleting information which is no longer needed
- Ensuring information held is updated and, when appropriate, is archived securely.

What do we do with your information?

Your information is transmitted using encryption technology and securely stored as per our Information Security Policy and controls. For certain pieces of information, we are required to retain hard copy records, which are also stored as per our Information Security controls.

We are the sole owners of the information collected on our website and we will only use your information to respond to you.

We only have access to and collect information that you have voluntarily given us.

If you are required to send us your credit or debit card information, your card details will always be transmitted securely. Any credit or debit card information stored by us are in an encrypted form and cannot be viewed by employees.

The data collected from you will be transferred, processed and stored at our dedicated secured offices, data centres or secure cloud storage. By submitting your personal data, you agree to this transfer, processing and storing.

We will take all reasonable steps necessary to ensure that your data is treated securely.

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If we are required to process your information which does not meet the requirements above, we will inform you prior to this.

Customer Responsibilities

Where we have given you a password or where you have selected a password which enables you to access certain parts of any of our websites or services, you are responsible for keeping this password confidential, including not sharing it with other persons.

Unfortunately, the transmission of information via the Internet is not completely secure. We will do our utmost to protect your personal data, we cannot guarantee the security of your data transmitted to any of our websites. In addition to the steps that we take to protect your personal data, you should take steps to help protect yourself against Internet fraud.

If any of your personal data changes or you identify any mistakes with the accuracy of your data, please contact us as soon as possible and we will update or correct your data.

CCTV

CCTV systems are used in many of our premises for the purposes of employee safety, public safety and crime prevention and detection. CCTV is also installed on the outside of some of our buildings for the purposes of monitoring building security, crime prevention and detection.

Images captured by CCTV will not be kept for longer than necessary (unless a crime is being investigated when there may be a need to keep images for longer).

Your rights as an employee data subject

As an individual you are accorded several rights under General Data Protection Regulation. These rights include that your personal data shall be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes;
- Relevant and limited to what is necessary for the purposes of Manx Telecom;
- Accurate and up to date.

You have the right to request a copy of the information held about you. If this information is incorrect, you have the right as an individual to request it to be rectified.

You also have the right for specific information to be erased, subject to applicable regulations or legislation.

If you object to the processing, feel that the personal employee information retained by us is inaccurate, or is being unlawfully processed, please contact the Manx Telecom Data Protection Officer.

Contact details for Data Protection Officer

You can contact the Data Protection by emailing <u>dataprotection@manxtelecom.com</u> or in writing at the following address:

Data Protection Officer, Manx Telecom Trading Limited, Isle of Man Business Park, Cooil Road, Braddan, Isle of Man, IM99 1HX.

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Complaints regarding data protection

If you have a complaint relating to data protection, please contact our Data Protection Officer at the address above. You also have the right to lodge a complaint with the Isle of Man Information Commissioner's Office – view contact details at <u>www.inforights.im</u>.

Changes to Privacy Notice

We may keep this privacy policy under review and may make changes from time to time which we will publish on the website. This privacy policy was last updated on 1st June 2021.

Contact

Questions, comments and requests are welcomed and should be addressed to Manx Telecom Trading Limited, Isle of Man Business Park, Cooil Road, Braddan, Isle of Man, IM99 1HX or by email to products@manxtelecom.com.



