

Privacy Policy

This privacy policy sets out how The Excell Group Plc ("**Excell**") uses and protects any information that you (or your employer or supplier) give Excell when you use the network or connection services (including Wi-Fi) ("**Services**") provided by Excell.

Excell is committed to ensuring that your privacy is protected. Should we collect information about you or if we ask you to provide certain information by which you can be identified when using the Services, then you can be assured that it will only be used in accordance with this privacy statement.

Excell may change this policy from time to time by updating this page and, where appropriate, notifying you by email. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 19 April 2016.

What information we may collect

- **Information you give us:**

You or your employer or supplier may give us information about you by filling in forms or by using our Services or by corresponding with us by phone, SMS, email or otherwise. This includes information you (or your employer or supplier) provide when registering to use our Services. The information you (or your employer or supplier) give us may include:

- your name, address
- email address
- phone number
- personal description
- demographic information such as postcode, preferences and interests
- other information relevant to customer surveys and/or offers

- **Information we may collect about you:**

We may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to our Services, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your use of the Services, including the full Uniform Resource Locators (URL) accessed through our Services (including date and time); your location; products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number;
- netflow data including the http protocol, Autonomous System number, data bandwidth and amount of data uploaded and downloaded

- **Information we receive from other sources**

We may receive information about you if you use any of the websites we operate or the other Services we provide. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected via the Services. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery Services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

What we do with the information we gather

We require this information to understand your needs and provide you with a better service. We use information held about you in the following ways.

- **Information you give to us**

We will use this information:

- to carry out our obligations arising from any contracts we enter into with you and to provide you with the information, products and Services that you request from us;
- to send you details relating to the service (for example, if you give us a mobile number, we may use this to text you a password), including to provide you or the user with usage details, or to advise of service limitations or expiry.

- **Information we collect about you**

We will use this information:

- to administer our Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our products and Services to ensure that content is presented in the most effective manner for you and for your computer;
- to improve our products and Services;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our Services safe and secure;

We may also use aggregated and anonymised usage and/or connection data for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

We may also share information with government departments or law enforcement purposes as required

- **Information we receive from other sources.**

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

- **Information we retain**

As a communications company we are required by legislation to have the capability to retain certain information.

We also retain certain data in the course of our business in order to improve our Services to customers. This includes for the purposes of fault diagnosis, trend analysis using aggregated data, highlighting abuse or security breaches, and the identification and mitigation of denial of service attacks.

Such usage data does not typically include personal information and we do not overtly track individual user usage. However, we retain the right to do so for purposes of security.

We typically retain data for periods ranging from 7 to 45 days or as directed by legislation after which we delete, aggregate or anonymise data.

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Disclosure of your information

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

- **We may share your information with selected third parties including:**
 - Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you.
 - The Service Sponsor.
 - Analytics and search engine providers that assist us in the improvement and optimisation of our Services.
- **We may disclose your personal information to third parties:**
 - If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
 - If Excell substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
 - If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or any contract that we have with you; or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support Services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted [using SSL technology]. Where we have given you (or where you have chosen) a password which enables you to access certain aspects of our Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted through our Services; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Controlling your personal information

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form when using our Services, look for the box that you can click to indicate that you do not want the information to be used by anybody for direct marketing purposes.
- If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by writing to or emailing us at enquiries@excellgroup.com

You may request details of personal information which we hold about you under the Data Protection Act 1998. A fee of £10 will be payable. If you would like a copy of the information held on you please write to The Excell Group Plc, 4-6 Langford Arch, London Road, Sawston, Cambridge, CB22 3FX.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct or delete any information found to be incorrect.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

Contact

To find out more about Excell call on 01223 505050 or email us enquiries@excellgroup.com.