

## Oakford Privacy Policy - Connectivity

At Oakford, we are committed to delivering an exceptional service to our customers. This commitment extends to ensuring data remains secure and private. The first step in enabling you to make the choice about using one of our products or services is to understand what data we collect, why we collect it, and what we do with it. This Notice includes information about our privacy practices that are specific to Oakford's Connectivity products. Please take the time to read this Notice and the Oakford Standard Privacy Notice, which both apply to the Connectivity products.

### Who is responsible for the data?

Before we explain the type of data we collected, why we collect it, and what we do with it, it is important you understand the two main data roles that exist and their responsibilities:

- **The Data Controller** determines the purposes and means of processing of personal data.
- **The Data Processor** processes personal data on behalf of a data controller.

Although these two roles sound like characters from the 1982 Sci-fi film, Tron they are in fact, well documented terms in data protection legislation, including but not limited to UK and EU Data Protection Laws.

This Privacy Notice covers Oakford Internet Services (OIS) connectivity solutions. If you are wondering what we mean by 'connectivity solutions' we are referring to solutions like ADSL, FTTC, FTTP, MPLS etc. For these services Oakford are acting as both a data processor and data controller; any Personally Identifiable Information (PII) we collect is used exclusively for provisioning and delivering the core service of your chosen connectivity solution.

For Internet traffic or data traversing our network, OIS are acting as a data processor.

### Information we collect

To use the OIS connectivity service you will need to share some information with us. In order for us to provision your account on the OIS connectivity platform and provide the core service, we need the following information, some of which is PII:

- **Personal and contact details of Technical Contact**, such as title, full name, email address;
- **Billing department contact details**, such as full name, address, telephone number, email address, postal address;
- **User identity and authentication information**, such as usernames, hashed passwords, IP Addresses, MAC addresses.

You can chose to send a variety of information across your OIS connection. You are determining the information that traverses your connection; Oakford are strictly processing this information to provide you with the connectivity service.

### How we use your information

Oakford collect and store some PII information to provide you with your chosen connectivity solution. Without your information, we would not be able to provide you with this service.

The information collected is stored and used in the UK exclusively for the following purposes:

- Provisioning your account connectivity account;
- Providing the connectivity solution;
- Billing;
- Support challenge resolution;
- Contacting you regarding your service e.g. changes to the platform, technical support, service outages.

Data sent across your connectivity is entirely under your control. Oakford do not view or store specific data sent across customer connections, unless related to support or maintenance activities. We are simply processing it to provide you with this service.

We do track various parameters of usage to help:

- Monitor and analyse trends and usage e.g. when you are exceeding your bandwidth quota;
- Enhance the safety and security of our products and services;
- Verify your identity and help protect against fraud or other unauthorised or illegal activity;
- Enforce our terms, conditions, and other usage policies.

### How we share information?

We share information about you in the following ways:

- **Government, regulatory bodies and law enforcement,** We may disclose your information to third parties if we determine that such disclosure is reasonably necessary to:
  - Comply with the law;
  - Protect any person from death or serious bodily injury;
  - Prevent fraud or abuse of Oakford systems or our users;
  - Protect Oakford's rights.
  - In the event of a government or legal request to provide our customer's data Oakford will be vigilant, ensuring there is clear and justified reason before handing over data. We aim to be transparent, protect our customer data and provide a trusted service.
- **Oakford employees,** In order for us to provide, improve, support and protect our services, Oakford staff members may share certain information. This is undertaken in compliance with this privacy notice and the Oakford Standard Privacy Notice and can include Information about you such as:
  - your name and contact details
  - All information about any query raised
  - Other information you have consented for us to share.
- **Service provider,** OIS connectivity uses the backbone network of providers like Virgin and BT. We need to share your PII information with these providers in order to quote and supply the requested connectivity solution; any information Oakford has access too will be handled in compliance with this Privacy Notice.

**It is important to say, we are not accessing or sharing data sent across your OIS connection.**

### How does Oakford protect your information privacy?

At Oakford, we are committed to following industry best practices when it comes to the security of your information, so much so we have a dedicated team of individuals and robots committed to keeping your information secure and private.

We are meticulous with our security controls and as an ISO27001:2013 certified organisation we continuously review the security of our backup platform to ensure only authorised and authenticated individuals access your information.

Oakford complies with all relevant laws and regulations in regards to protecting customer data, including but not limited to UK and EU Data Protection Laws.

### How long does Oakford keep your data?

We retain information stored on our platform for as long as needed to provide you with your subscribed services. If you cancel a service, then we aim to delete all this information. However, please note:

- There might be some latency in deleting this information from our servers and backup storage;
- We may retain this information if necessary to comply with our legal obligations.

### Where does Oakford keep your data?

Easy, the United Kingdom only.

### Control over your information

We want you to be in control of your information. If you would like more information on the data we hold or to request removal of data contact [privacy@oakfordis.com](mailto:privacy@oakfordis.com).

### Revisions to this privacy policy

We will update our Privacy Notice's from time to time. The latest copy will always be available on our websites.

### More questions

Not a problem, start by taking a look at our privacy webpages. If you still have questions then please email either [privacy@oakforduk.com](mailto:privacy@oakforduk.com) or [privacy@oakfordis.com](mailto:privacy@oakfordis.com) and one of our Data Protection Officers will respond accordingly.