

Oakford Standard Privacy Notice

Use of your Personal Data

At Oakford, we are committed to delivering an exceptional service to our customers. This commitment extends to ensuring our customer data remains secure and private. The first step in enabling you to make the choice about storing your information with us is to explain why data is collected, how it is used and with whom we share it.

As an Managed Service Provider (MSP), Internet Service Provider (ISP) and Hosting Service Provider our services are extensive, to name a few, support services, internet connectivity, MPLS, cloud backup, website hosting, VoIP telephony, hosted email, cloud storage, cloud compute. We take our responsibility to protect the privacy of your information extremely seriously and to be transparent with our customers on data protection and privacy policies.

This privacy Notice applies to all products and services, and cases/examples where we collect your personal data. Please take the time to read this Notice and the Privacy Notice's for the services you are subscribed to.

Who is responsible for the data?

Before we explain the type of data we collect, control and/or process, 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.

The role Oakford take with your information depends on the specific service or platform. To keep things simple and to be as transparent as possible we have specific privacy Notice's for each of our services on our website. This privacy Notice and the service specific privacy Notice both apply.

What kinds of personal information do we process?

This varies according to the service your organisation subscribes to. The best way to answer this question is to visit the privacy section on our website and review the relevant service privacy policy.

Personal information that we'll process in connection to our products and services, can include:

- **Personal and contact details**, such as title, full name, email address, telephone number, postal address, contact details and contact detail history;
- **Your date of birth, gender and/or age;**
- **User identity and authentication information**, such as usernames, hashed passwords, IP Addresses, MAC addresses;
- **Records of your contact with us** such as via the phone number of our support desk, if you get in touch with us online using our online services, IP address and MAC addresses, log information;
- **Personal information which we obtain from Credit Reference Agencies and Fraud Prevention Agencies**, Including public and shared credit history, financial situation and financial history.
- **Marketing to you and analysing data**, includes history of those communications, whether you open them or click on links, and information about products or services we think you may be of interest;
- **Log Data**, such as access times, resources requested, websites visited, web cookies.

What is the source of your personal information?

We'll collect personal information from the following sources:

- From you directly;
- Information generated about you when you use our products or services;
- Shared with us by Government, regulatory bodies and law enforcement.

What do we use your personal data for?

We use personal data to provide the service that you have subscribed too. In most cases, this means:

- Communicate with you about an order;
- Communicate with you for billing purposes;
- Communicate with you about your current services;
- Respond to support enquiries;
- Performing credit or company checks for new customers;
- Monitor and analyse trends and usage;
- Enhance the safety and security of our products and services;
- Verify your identify and protect against fraud or other unauthorised or illegal activity;
- Enforce our terms, conditions, and other usage policies.

Many of the services we provide hold personal data that we do not control. In this scenario Oakford are a data processor and we encourage you to read our Privacy Notices for more details.

What are the legal grounds for our processing of personal information?

We rely on the following legal bases to process personal data:

- 1) Where it is needed to provide you with our products or services**, such as:
 - a. Assessing an application or proving a quote for a product or service, including consider whether or not or offer you the product, the price, the payment methods available and the conditions to attach;
 - b. Managing products and services you hold with us, or an application for one;
 - c. Updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debit (where appropriate);
 - d. Sharing your personal information with partners or suppliers to provide quotations or supply a service;
 - e. All stages and activities relevant to managing the product or service including support requests, quotations.
- 2) Where it is in our legitimate interests to do so**, such as:
 - a. Managing your products and services relating to that, updating your records, tracing your whereabouts to contact you about your account and doing this for recovering debit (where appropriate);
 - b. To follow guidance and recommend best practice of government and regulatory bodies;
 - c. For management and audit of our business operations including accounting;
 - d. To carry out credit checks, at the application stage or before a service is supplied;
- 3) To comply with our legal obligations**
- 4) With your consent or explicit consent**
 - a. For some direct marketing communications.

When do we share your personal information?

We may share information with the following third parties for the purposes listed above:

- **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 Privacy Policy 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.
- **Software manufacturer,** Sometimes even our Oakford engineers need help in resolving those tricky technical support challenges. As such, we will need to share some information with the software manufacturer. The type of information shared matches what we listed in the 'With Oakford employees' section.
- **Resellers and Partners,** Some products or services we provide come from one of our partners. In order to quote or provide these services we will need to share some PII information.

How and when can you withdraw your consent?

Where we're relying upon your consent to process personal data, you can withdraw this at any time by contacting us using the contact details on our privacy page.

Is your personal information transferred outside of the UK or the EEA?

Most of the cloud services we sell are hosted from our own data centres. Data stored on our platforms resides in the UK only. You will find a specific privacy policy for each of our services on the privacy section of our website.

We do resell some cloud services such as Office 365. You will need to check with the hosting provider for specific details on where data is held.

What should you do if your personal information changes?

You should tell us so that we can update our records. You'll find our contact details at the top of this letter and on our websites.

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 and backup data, 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 and backup data.

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 is your personal information retained by us?

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 of 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.

What are your rights under data protection laws?

Here is a list of the rights that all individuals have under data protection laws. They don't apply in all circumstances. If you wish to use any of them, we'll explain at that time if they are engaged or not.

- The right to be informed about the processing of your personal information;
- The right to have your personal information corrected if it's inaccurate and to have incomplete personal information completed;
- The right to object to processing of your personal information;
- The right to have your personal information erased (the "right to be forgotten");
- The right to request access to your personal information and to obtain information about how we process it;
- The right to move, copy or transfer your personal information ("data portability"); and
- Rights in relation to automated decision making which has legal effect or otherwise significantly affects you.

You have the right to complain to the Information Commissioner's Office, which enforces data protection laws – <https://ico.org.uk/>. You can contact our DPO through our privacy website for more information on all of the above.

Your right to object?

You have the right to object to certain purposes for processing, in particular to data processed for direct marketing purposes and to data processed for certain reasons based on our legitimate interests. You can contact us using the details on our privacy page to exercise these rights.

Changes to this privacy notice

We will update this Privacy Notice and our Privacy Policies 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 or privacy@oakfordis.com and one of our Data Protection Officers will respond accordingly.