

Privacy Policy

Introduction

We are committed to protecting and respecting your privacy. This Privacy Policy explains what personal data and other information is collected by us, Eurodexx Ltd (“Eurodexx”, “we”, “our”), as part of our activities, and how we use or process that information.

We are committed to complying with the Data Protection Act 1998 and, with effect from 25th May 2018, the EU General Data Protection Regulation (GDPR). These are referred to in this Privacy Policy as “Data Protection Laws”. The Data Protection Laws give you various rights regarding the way in which we store and use your information, which are set out below in **Section 2f: Your rights under the Data Protection Laws**.

For the purpose of the Data Protection Laws, Eurodexx Ltd is registered at: 86-90 Paul Street, London EC2A 4NE. If you have any questions about this Privacy Policy, our practices, or your dealings with Eurodexx, you can contact us on legalcompliance@eurodexx.com

To make it easier for you to review those parts of the Privacy Policy which apply to you, we have divided up the document into two sections. Please take the time to read **Section 1: General** if you are using our website or contacting us via phone or email. If you are a Customer, please also read **Section 2: Customers**.

In this Privacy Policy, when we use the following words they will have these meanings:

“Customer”	an individual who is either an individual customer of Eurodexx or who is a director, employee or other individual stakeholder in a business customer of Eurodexx.
“Personal Data”	means information from which the identity of a living individual may be determined. Examples of Personal Data include (but are not limited to) first and last name, home or other physical address, email address, phone number and other contact information.
“Visitor”	means an individual that visits the Website or makes an enquiry with Eurodexx over the phone/via email.
“you”, “your”	means anyone who interacts with the Website or with a Eurodexx employee over the phone/via email, including Customers and Visitors.
“Website”	means Eurodexx’s website at www.eurodexx.com

Section 1: General

This section applies to everyone who visits, or otherwise interacts, with our Website and/or makes an enquiry to Eurodexx via phone or email.

1a: How we use cookies

We may obtain information about your general internet usage by setting a cookie file which is stored on your browser or the hard drive of your computer, tablet, smartphone or other device (a “Device”). We use both session ID cookies and persistent cookies. We use session cookies to make it easier for you to navigate our site. A session ID cookie expires when you close your browser. A persistent cookie remains on the hard drive of your Device for an extended period of time. You can remove persistent cookies via your browser’s “clear cookies” function. Please see www.allaboutcookies.org for more information about blocking cookies on your particular web browser.

Unless you have adjusted your browser setting so that it will refuse cookies, we will drop cookies onto your Device as soon as you visit our site. Persistent cookies enable us to track and target your interests to enhance your experience on our Website. For example, we use this data to understand how you interact with our Website so we can make improvements to the information and their design.

1b: IP addresses

We collect and store information about your Device, including where available your IP address, operating system and browser type. This is anonymous statistical data about your browsing activities and patterns, and normally does not contain any Personal Data.

1c: What we share with third parties

We use analytics technologies provided by Google Analytics and other third parties. This involves cookies being set via the Website, which then collect information about your usage. This information is anonymous and does not contain any Personal Data.

We may also use remarketing technologies provided by Google AdWords and other third parties. This involves cookies being set by the Website in order to show you ads across your different devices after you have left the Website.

1d: Other personal data

We also collect your personal data when you:

- contact us by any means with a query or ask us to email you information about a product or service
- book any kind of appointment with us, for example a meeting to review your business’s telecommunications
- engage with us on social media.

In these circumstances, we will collect your name, job title, business email address and phone number. You have the right at any time to ask for a copy of the information we hold on you, and for that to be deleted, simply by calling us on 020 333 333 00 or emailing us at legalcompliance@eurodexx.com.

You can read more about our policy for using and storing your Personal Data, as well as your rights, below, in sections **2c: Where, how and for how long we store your Personal Data**, **2e: What information we share with third parties**, and **2f: Your rights under the Data Protection Laws**.

1e: How we use the information that we collect from you

We use information collected from you to respond to your query accurately. We may also use it:

- To send you emails about new services, special offers or other information that we think may be of interest. You may request that we stop using your information for direct marketing purposes at any time and without giving any reason.
- To help us improve the services we provide.

1f: Your consent

By using our website or making an enquiry with us, you are agreeing to the terms of this Privacy Policy, and consent to the cookies referenced above being set on your device, as well as the information stated above being collected.

1g: Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time, so please review it frequently.

1h: Data Protection Service

You can obtain further information about data protection and privacy laws by visiting the Information Commissioner's web site at: <https://ico.org.uk/for-the-public/>.

Section 2: Customers

This section describes what information we collect from Customers, and how we use that information.

2a: What information we collect

When you become a Eurodexx Customer, we collect and store certain pieces of Personal Data and other information relating to you, including (but not limited to):

- When you set up a telecommunications network services account with us or purchase equipment from us, we will request information such as your name, private/business email or postal address, telephone or mobile number, financial or banking information, company registration number, VAT number, IP address(es) to help us identify you, process your order and to provide a quality service to you. In some circumstances, we may also need you to send us proof of identity, such as a driver's licence. ☒
- When you contact us to discuss your services, we will ask for certain information to be able to confirm your identity and deal with your query. ☒
- Where WLR and Broadband services are provided, we collect and store call record data, including the CLI passed, the call date and time, the IP the call originated from, the number dialled and the duration of the call. This information is stored securely within a third-party specialist billing platform, which we use solely to create accurate invoices for our network services and your usage of them.
- Where service issues are reported, personal data may be requested to help us investigate them, such as call date and time, number dialled and CLI passed.
- Where you have a telephone system operating on our Metavoxx platform, individual phone user names and numbers may be input and stored (at <http://control.metavoxx.com>) purely to enable you to manage your system.

2b: How we use the information that we collect from you

We use information collected from you to provide the functionality of our website and to manage the services provided on your account with us. We also use the information to:

- Communicate with you on matters relating to your Eurodexx Account, or to send you emails about new services, special offers or other information that we think may be of interest. You may request that we stop using your information for direct marketing purposes at any time and without giving any reason.
- To help us improve the Website and the services we provide.

2c: Where, how and for how long we store your Personal Data

The information that we collect from you (including any Personal Data) may be transferred to, and stored at, various destinations, including outside the European Economic Area ("EEA"). It may also be processed by staff operating at various locations outside the EEA who work for us, or for one of our payment processing, website development, website penetration testing (also known as "ethical hacking"), hosting, connectivity or telecommunications service providers. By providing us with your information (including Personal Data), you agree to this transfer, storing and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

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 information transmitted to our Website; 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.

- We secure access to our websites using 'https' technology.
- Access to our systems storing your personal data is always password-protected.
- We regularly monitor our systems for possible vulnerabilities and attacks.
- Our employees are all bound by confidentiality clauses within their contracts.

We will store your Personal Data for the duration of your time with us as a Customer or as long as is necessary for the purpose for which it was collected. You can request at any time for a copy of your information (including Personal Data) and for it to be removed (as per your 'right to be forgotten'), following the termination any services provided by us to you.

2d: Updating your information

You can update the information held on your Eurodexx Account at any time by emailing us at legalcompliance@eurodexx.com. It is your responsibility to:

- ensure that your contact details are up to date
- protect against unauthorised access to your Eurodexx Account Services
- log off from your Eurodexx Enlighten (online billing account) when not using it
- keep your Enlighten (online billing account) log-in details secret
- keep your Metavoxx (phone system control panel) log-in details secret
- log off from your Metavoxx (phone system control panel) when not using it

2e: What information we share with third parties

We will share information with other parties who help us provide services to you, eg. equipment finance and telecommunication network service providers. In all cases, they are required to follow our express instructions in respect of the use of your personal information and they must comply with the requirements of the GDPR and any other relevant legislation to protect your information and keep it secure.

We may disclose your Personal Data to third parties:

- In the event that 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 Eurodexx or substantially all of its assets are acquired by a third party, in which case Personal Data held by us 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 our contractual rights; or to protect the rights, property, or safety of Eurodexx, our stakeholders, or others.

We may also disclose your Personal Data to any member of our group of companies.

Except as set out above, ***we do not share your Personal Data with any third parties.***

2f: Your rights under the Data Protection Laws

You have certain rights under the Data Protection Laws, including:

1. The right at any time to withdraw your consent to our processing of your Personal Data.
2. The right to be told what Personal Data we hold about you on our database and how we process that data.
3. The right to request that we provide you with a copy (in a commonly used electronic format) of all the Personal Data that we hold about you. Unless you make repeated requests, we will not charge a fee for providing you with a copy of this data.
4. The right to request that we correct any inaccurate or incomplete Personal Data that we hold about you.
5. The right to request that we irretrievably delete all Personal Data that we hold about you (the so-called “right to be forgotten”). Note that there are limited circumstances in which we are legally entitled to refuse to comply with this request.
6. The right to request that we transmit all the Personal Data that we hold about you (in a structured, commonly used and machine-readable form) to another organisation’s IT environment. Note that we are only legally obliged to comply with this request if it is technically feasible for us to do so.

Should you wish to exercise any of the above rights, please contact us by post at:

Eurodexx Ltd
86-90 Paul Street
London
EC2A 4NE

or by email at legalcompliance@eurodexx.com.

If you exercise any of the above rights, then we will action your request as soon as reasonably practical and, in any event, within one month. We may ask for proof of identity to make sure we are giving information to the right person.

2g: Links to other websites

Our Website may contain links to enable you to visit other websites which may be of interest. However, once you have used these links to leave our Website, we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites. You should exercise caution and look at the privacy statement applicable to the website in question.

2h: Your consent

As a customer, you agree to the terms of this Privacy Policy, and consent to the collection, storage, processing and sharing of your Personal Data and other information on the basis set out above.