



Velocity 1 Limited (“Velocity 1”) / Magnet Networks Limited (“Magnet Networks”) Privacy Notice

Introduction

Magnet Networks, which owns 80% of Velocity1, operates a shared service centre in Dublin, Ireland, where all processing of data and administration is performed. As such Magnet Networks is the Data Controller for Velocity 1 and the Data Protection Commission in Ireland is the lead Statutory Authority involved. Please note if complaints are initiated with the ICO in the UK these will be dealt with by the lead statutory authority, being the Data Protection Commission in Ireland. This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain. The General Data Protection Regulation (GDPR) seeks to protect and enhance the rights of data subjects.

These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain.

Magnet Networks is strongly committed to protecting the privacy of its user community. The intent of this privacy statement is to detail the information Magnet Networks may gather about individuals who visit its website and how that information is used.

Personal Data

Magnet Networks uses the information collected from you to provide quotations, make telephone contact and to email you marketing information which Magnet Networks believes may be of interest to you and your business. In you making initial contact you consent to Magnet Networks maintaining a marketing dialogue with you until you either opt out (which you can do at any stage) or we decide to desist in promoting our services.

Magnet Networks also acts on behalf of its clients in the capacity of data processor. When working exclusively as a data processor, Magnet Networks will be acting on the instruction of its client, and will work hard to ensure that the client is fully GDPR compliant.

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally identifying information like Internet Protocol (IP) addresses.

Cookies Policy

Magnet Networks may from time to time use such information to identify its visitors. Magnet Networks may also collect statistics about the behaviour of visitors to its website. The Magnet Networks websites uses cookies, which is a string of information that a website stores on a visitor’s computer, and that the visitor’s browser provides to the website each time the visitor returns.

“Cookies” are small pieces of information stored by your internet browser that collect data such as your browser type, your operating system, web pages visited, time of visits, content viewed, advertisements viewed and other click stream data. We use cookies to help us tailor our websites to your needs, to deliver a better, more personalised service and to remember certain choices you’ve made so you don’t have to re-enter them. Cookies also enable us to identify traffic to our website including pages visited, visitor numbers and traffic paths taken.

More specifically a “cookie” is a small text file which is stored, either on your hard drive, or in memory until your browser is closed. Cookies are used by Magnet Networks to enhance your experience of the site and facilitate ease of navigation through the website. We also collect statistical data via the website, which allows us to assess the number of visitors to the website and to identify what page is viewed most frequently.

You are entitled to object to our use of cookies and you can disable cookies on your website browser. However, you should be aware that certain cookies may be necessary in order to provide you with certain features such as the customised delivery of certain information.

We may use advertising networks to help present advertisements or other content on our website and other websites that display Magnet Networks advertisements. Advertising networks use cookies, web



beacons, or similar technologies on your computer or mobile or other device to serve you advertisements or content tailored to interests you have shown by building a profile of your internet browsing on this website and other websites you have visited.

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies" as outlined above. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

You can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en>.

Please note that this website initializes Google Analytics with the setting anonymizelp. This guarantees anonymised data collection by masking the last part of your IP address.

Link to Third Party Sites

Please note that this policy applies only to the Magnet Networks website and not to the websites of other companies or organisations to which we provide links. Any third-party websites are viewed at your own risk.

Legal basis for processing any personal data

To meet Magnet Networks contractual obligations to clients and to also respond to marketing enquiries, or provide services requested directly by you.

Legitimate interests pursued by Magnet Networks Group and/or its clients

To promote the services offered by Magnet Networks and/or to market the services and/or products offered by Magnet Networks to existing clients.

Consent

Through agreeing to this privacy notice you are consenting to Magnet Networks processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing DPO@magnetnetworks.com or calling us or writing to us.

Acquisition of Data

All Data will be collected in an open and honest manner and obtained fairly. We will make you aware of all purposes that we intend to use your Data for, when we collect your data and prior the use of your data.



Data will be accurate and complete and, where necessary, kept up to date. Magnet Networks has an online portal where our customer can update their contact details.

Data will be adequate, relevant and not excessive in relation to the purposes for which it was obtained.

The acquisition methods we use for example account application forms, marketing surveys, or competition entries will have clear information to explain the intended purposes including secondary uses that may not be obvious to you for example if a competition entry is intended to be used for marketing purposes we will clearly advise you of this and the appropriate opt out mechanism. You should read this statement carefully before using the website.

How data is obtained

Information can be provided to us through our website, Livechat, emails or on calls when you enquire about a service, enquire about bill, or call to pay a bill or place an order and book a service appointment.

Information that has been provided by other organisations that obtained your permission to share the data.

Call data

Information can be obtained on calls in and out of Magnet Networks which are recorded for quality and training purposes but are only kept for a period of 30 days.

How we use your data

We need your data so as to be able to enquire about, and provide the services to you, as per your contract. The details will only be accessible by Magnet Networks agents or approved third parties to assist in identification of your account. Your data will be used in the performance of a contract to be able to communicate with you on Sales, Support, Billing, Service delivery issues and to meet our regulatory requirement and adherence to applicable Laws.

Marketing Preference

From time to time we may send you a marketing message that could be of interest in relation to amending your product from a service or contract issue, or to partake in a survey.

You can amend your preferences at any time to unsubscribe from direct marketing messages by clicking unsubscribe on a marketing email. This will not unsubscribe you from receiving communications from Magnet Networks in relation to information on your account in the performance of service to you.

Disclosure

Magnet Networks may on occasions pass your personal information to third parties exclusively to process work on its behalf. Magnet Networks requires these parties to agree to process this information based on our instructions and requirements consistent with this privacy notice and GDPR.



Magnet Networks do not broker or pass on information gained from your engagement without your consent. However, Magnet Networks may disclose your personal information to meet legal obligations, regulations or valid governmental request. Magnet Networks may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of Magnet Networks, its clients and/or the wider community.

Data storage

Data is held in Ireland using different (multiple) servers. Magnet Networks does not store personal data outside the EEA.

Securing your Data

Magnet Networks takes technical measures as well as organisational security measures which are set out in law and by industry standards to ensure that we protect your personal data from unauthorised access, use or disclosure.

We will ensure that we use your personal information as set out in our privacy notice and to the choices that you have made regarding permission. Magnet Networks only partner with reputable service providers who contract to provide the same level of security on information so that your data is at all times protected and used in accordance with our privacy notice.



Retention Policy

Magnet Networks will process personal data during the duration of any contract and will continue to store only the personal data needed in accordance with Magnet Networks Data Retention Policy and as required by Law or Regulations

Record	Retention Period
Call Detail Records	<p>Call detail records will remain visible on the online customer portal for periods up to 1 year.</p> <p>Call details records that form part of your invoice will be visible on reprints of invoices and kept for a period of 6 years plus the current year.</p> <p>By law we must retain call detail records for a period of 2 years. Records are located in a secure area.</p>
Recorded Calls	Recorded Calls are stored for a period of up to 30 days
Data Usage / Connection Stats / Website traffic	<p>Data Service Usage is kept for a period up to of 6 months plus current month. Service usage record will not include data content.</p> <p>Connection statistics are kept for a period of up to 1 year one year post contract end date.</p> <p>Web site traffic data is only kept on our network for 24 hours but does not include data content.</p>
Invoice Details	Legally invoice details are required to be maintained for a period of 6 years and the current year.
Customer Support Information	Customer communications in relation to a contracted service is maintained for a period up to 2 years post contract end date.
Customer Contracts	Contracts are stored to support invoices raised which must be kept for a period of 6 years plus current year
CCTV Images	Images are kept for 28 days, unless a request is made from the Police then it can be kept for 2 years which is stored locally.
Cookies	<p>Session cookies are only stored on a per session basis to assist in the customers navigation of our web-sites, so that we offer personal content for you.</p> <p>Persistent cookies are only stored to assist in the customer’s navigation of our web-sites using the stored data to display related preferences.</p> <p>Customer can control cookies by changing the options on their own PC. For more See http://www.allaboutcookies.org/</p>



Your rights as a data subject

At any point whilst Magnet Networks is in possession of or processing your personal data, all data subjects have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to certain types of processing such as direct marketing.
- **Right to object to automated processing, including profiling** – you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that Magnet Networks refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.

Magnet Networks at your request, can confirm what information it holds about you and how this information is processed.

You can request the following information:

- Identity and the contact details of the person or organisation (Magnet Networks) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Magnet Networks or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (Data Protection Regulator).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.



To access what personal data is held, identification will be required

Magnet Networks will accept the following forms of ID when information on your personal data is requested: a copy of your national ID card, driving license, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Magnet Networks is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to Sar@magnetnetworks.com or writing to us at the address further below.

Changes to Privacy Statement

Magnet Networks may change this Privacy Statement from time to time. It is advisable that you review this Privacy Statement regularly for any such changes.

Governing Law

This Privacy Statement is governed by the laws of Ireland and you submit to the exclusive jurisdiction of the Irish Courts.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Magnet Networks or its partners, you have the right to complain to Magnet Networks. If you do not get a response within 30 days, you can complain to the Data Protection Regulator.

The details for each of these contacts are:

Magnet Networks

Attention of the Complaints Department
IDA Business and Technology Park.
Clonshaugh,
Dublin 17, Ireland

Telephone 1800 789 789 or email complaints@magnetnetworks.com

Data Protection Regulator Ireland

Canal House, Station Road
Portarlinton
Co. Laois, R32 AP23

Telephone +353 761 104800
email: info@dataprotection.ie

Information Commissioner's Office

Wycliffe House
Water Lane, Wilmslow
Cheshire, SK9 5AF

Telephone 0303 123 1113