



Data Privacy Policy

Last updated	18 th September 2018
Version	1.0

Definitions

GDPR	EU General Data Protection Regulation.
Responsible Person	Individual registered with the ICO as either the Privacy Officer (PO) or data protection officer (DPO)
Register of Systems	means a register of all systems or contexts in which personal data is processed by CCN.
CCN	CCN Communications Ltd and Verevo Ltd

1. Introduction

At CCN we take data privacy and security very seriously. This document details how we collect and process your data in accordance with the requirements laid down in the GDPR.

We recognise the need to ensure that any personal data that we collect is properly protected and that we are transparent and responsible in the way we process it.

This document details what personal data we collect as a controller, what we do with it and how you may contact us if you need any further information.

Where CCN processes data on your behalf details of such processing are provided within the written and agreed contract terms and conditions and are available at any time on request.

2. From whom does CCN collect personal data?

CCN collects personal data from customers, suppliers and professional advisers, and their employees with whom CCN has an existing or prospective business relationship (“**Business Partners**”) in order to manage such relationship and interact with the Business Partners.

3. Who is the controller?

In relation to personal data that has been collected, CCN acts as the controller and collects and processes such data on the grounds of its legitimate interest of managing the relationship with Business Partners.

4. What personal data does CCN collect?

The personal data consists of any or all of the following: name, address, email, telephone numbers, communications records (emails and letters) and addresses relevant to the execution of CCN business.

5. How does CCN collect personal data?

Personal data as defined in point 3 is collected during our engagement with Business Partners by email, phone, meetings, CCN's website (www.ccnommunications.co.uk) and events organised by CCN.

6. How does CCN use the personal data?

The personal data is exclusively used for the management of the relationship with the Business Partner and, in the case of existing or prospective customers, for the promotion of services provided by CCN relevant to them. Personal data is not used for automated decision taking (including profiling).

7. With whom does CCN share the personal data?

Personal data is shared among the CCN Entities (as defined below) for the same purposes stated above.

In addition, where there is sufficient requirement as detailed under the GDPR regulations to do so, personal data may be shared with existing customers and those of our suppliers of services who need to have that data in order to be able to provide their services to our customers, which include Virgin Media Limited, BT and Gigaclear, among others.

8. Does CCN transfer personal data outside the European Economic Area?

No personal data is transferred outside the EEA in relation to prospective and existing customers.

9. How long does CCN retain the personal data?

Personal data is retained for the duration of the relationship with the Business Partner and for a period of up to 7 years from the end of such relationship.

10. What rights do Business Partners have in relation to their personal data?

Business Partners have, in relation to their personal data, the following rights: right of access, right to rectification, restriction of processing, erasure ("right to be forgotten"), data portability, object to the processing, and their right not to be subject to an automated individual decision making.

These rights can be exercised by contacting CCN using the contact details provided below.

11. Does CCN use cookies in its website?

CCN use cookies subject to the CCN Cookie Policy available at <https://www.ccncommunications.co.uk/cookie-policy>.

12. How to contact CCN?

CCN's Data Protection Officer can be reached using the following contact details:

Data Protection Officer, CCN Communications Ltd, Unit F1, Daedalus Park, Daedalus Drive, Lee-On-The-Solent, Hampshire, England, PO13 9FX.

Phone number – 0808 1695696

The data protection officer can be contacted on the following email address. dpo@ccncommunications.co.uk.

13. Complaints

Complaints can be raised with CCN by contacting the Data Protection Officer detailed above, or with the Information Commissioners Office (ICO): www.ico.org.uk on 0303 123 1113.
