

Data Privacy Policy

Date of Review

01 June 2025

Definitions

UK GDPR: United Kingdom 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: 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 personal data in accordance with the requirements laid down in the UK GDPR and the Data Protection Act 2018.

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

This document outlines what personal data we collect as a controller, what we do with it and how you may contact us if you need 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 upon request.

2. From whom does CCN collect personal data?

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

3. Who is the controller?

CCN acts as the controller for personal data that it collects and processes on the grounds of its legitimate interest in managing relationships with Business Partners. A Legitimate Interests Assessment (LIA) has been conducted to ensure that this does not override the rights and freedoms of data subjects.

4. What personal data does CCN collect?

Personal data may include name, address, email address, telephone numbers, communications records (emails and letters), and other addresses relevant to the

execution of CCN business.

5. How does CCN collect personal data?

Data is collected during engagements with Business Partners through email, phone, meetings, CCN's website (<https://www.ccncommunications.co.uk>), and events organised by CCN.

6. How does CCN use the personal data?

Personal data is used solely for managing relationships with Business Partners and, for prospective and existing customers, to promote relevant services offered by CCN. No automated decision-making (including profiling) is currently used. Should this change, this policy will be updated accordingly.

7. With whom does CCN share the personal data?

Personal data may be shared among CCN entities for the above purposes. It may also be shared with suppliers and customers, including but not limited to CityFibre Limited, Virgin Media Limited and BT, where necessary for service provision and under the appropriate lawful basis.

8. Does CCN transfer personal data outside the UK?

No personal data is transferred outside the UK. Should such transfers become necessary, CCN will implement appropriate safeguards in line with UK GDPR, such as International Data Transfer Agreements (IDTAs) or Standard Contractual Clauses (SCCs) with UK addendums.

9. How long does CCN retain the personal data?

Personal data is retained for the duration of the business relationship and for up to 7 years following the end of the relationship, unless otherwise required by law.

10. What rights do Business Partners have?

Business Partners have the right to access, rectify, restrict, erase (right to be forgotten), port, object to processing, and not be subject to automated decision-making. These rights can be exercised by contacting the Data Protection Officer at the details below.

11. Does CCN use cookies?

Yes, cookies are used in accordance with CCN's Cookie Policy available at: <https://www.ccncommunications.co.uk>.

12. How to contact CCN?

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

Phone: 0808 169 5696

Email: dpo@ccncommunications.co.uk

13. Complaints

Complaints can be raised by contacting the Data Protection Officer. You may also contact the Information Commissioner's Office (ICO) at www.ico.org.uk or call 0303 123 1113.

Two handwritten signatures in black ink, one on the left and one on the right, positioned above the pink circular stamp.A large, light pink circular stamp that partially overlaps the text below it.

Matt Skilton / Ashley Adams
Directors – CCN Communications
1st June 2025