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## TALK STRAIGHT LIMITED PRIVACY POLICY

### What information do we collect about you?

When you register with us or place an order for products or services we collect some information about you. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions. Some website usage information is also collected. (See below)

### How do we process this data?

We will only process your data if:

The processing is necessary for the performance of our contract with or you have asked us to do something before entering into a contract, such as provide a quote,  
OR

The processing is necessary for our legitimate commercial interests and they're not overridden by your rights  
OR

The processing is necessary to comply with a legal obligation to which we are subject,  
OR

Where we have your consent.

### How will we use the information about you?

#### Communicating with you:

This may include:

Processing your order

Managing your account

Providing you with information you've requested from us, such as training materials

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**Supporting you**, assisting you with the resolution of technical issues

**Protecting you**, so that we can try to detect and prevent any fraudulent and malicious activity

**Marketing communications** about our products and services we think may be of interest to you.

### How we share your data

There are times when we need to share your personal data with third parties. We will only share your data with:

Other companies in the Talk Straight Group.

Third party service providers and partners who enable us to supply our services to you, such as the providers of Content Filtering, Firewall and Anti-virus services.

Third parties if we are under a duty to disclose or share your data in order to comply with any legal obligation, or to enforce or apply any contract with you or other agreements; or to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

In processing your order we may send your details to, and also use information from, credit reference agencies and fraud prevention agencies.

Talk Straight will not share your information with companies outside the Talk Straight Group for those companies' marketing purposes.

### Marketing

We would like to send you, occasionally, information which may be of interest to you about products and services of ours.

You have a right at any time to stop us from contacting you for marketing purposes.

### Access to your information and correction

If you would like a copy of some or all of your personal information, please email or write to us at the following addresses.

Email: [info@talk-straight.com](mailto:info@talk-straight.com)

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Write to:     The Data Protection Officer  
              Talk Straight Limited  
              Units 2-4 Backstone Business Park  
              Ilkley  
              LS29 8JZ

We may make a small charge for this service.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate and ask to be removed from marketing lists.

## Data Security

We process all personal data we hold in accordance with our Data Security Policy and take appropriate security measures against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. Personal data will only be transferred to data processors if they agree to comply with those procedures and policies, or if they put in place adequate measures themselves.

We maintain data security by protecting the confidentiality, integrity and availability of the personal data, defined as follows:

Confidentiality means that only people who are authorised to use the data can access it.

Integrity means that personal data should be accurate and suitable for the purpose for which it is processed.

Availability means that authorised users should be able to access the data if they need it for authorised purposes.

Security procedures include:

Entry controls. Visitors are restricted to reception and toilets. Any stranger seen in entry-controlled areas should be reported.

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Desks, filing cabinets, drawers and cupboards are kept locked if they hold confidential information of any kind. (Personal information is always considered confidential.)

Methods of disposal. Paper documents are shredded. Digital storage devices are physically destroyed when they are no longer required.

Equipment. Data users ensure that individual monitors do not show confidential information to passers-by and that they log off from their PC when it is left unattended.

### International Data Transfers

If we transfer any personal data we hold to a country outside the European Economic Area (EEA) we ensure that one of the following conditions applies:

(a) The country to which the personal data is transferred ensures an adequate level of protection for the data subjects' rights and freedoms.

OR

(b) You have given your consent.

OR

(c) The transfer is necessary for one of the reasons set out in the Act, including the performance of our contract with you, or to protect your vital interests.

OR

(d) The transfer is legally required on important public interest grounds or for the establishment, exercise or defence of legal claims.

OR

(e) The transfer is authorised by the relevant data protection authority where we have adduced adequate safeguards with respect to the protection of your privacy, your fundamental rights and freedoms, and the exercise of your rights.

OR

Subject to the requirements in *para. (a)* above, personal data we hold may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. That staff maybe engaged in, among other things, the fulfilment of contracts with you, the processing of payment details and the provision of support services.

## Website

This privacy policy explains how Talk Straight uses any personal information we collect when visiting our website.

Talk Straight uses your information collected from the website to personalise repeat visits.

When visiting [www.talk-straight.com](http://www.talk-straight.com) or [www.schoolsbroadband.co.uk](http://www.schoolsbroadband.co.uk) Talk Straight uses Google Analytics' 3rd-party audience data such as age, gender, and interests to better understand the behavior of our customers and work with companies that collect information about your online activities to provide advertising targeted to suit your interests and preferences. This is collected via automated means (such as cookies or page tags).

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. For further information visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). You can set your browser to not accept cookies and the above websites tell you how to remove cookies from your browser. However in a few cases some of our website features may not function as a result.

These third party companies also use automated technologies to collect information when clicking on adverts which assists tracking, managing and personalising our marketing efforts.

You may **opt out** of the automated collection of information by third-party ad networks for the purpose of delivering advertisements tailored to your interests, by visiting the consumer opt-out page for the Self-Regulatory Principles for Online Behavioral Advertising at <http://www.aboutads.info/choices/> and edit or opt-out your Google Display Network ads' preferences at <http://www.google.com/ads/preferences/>.

Talk Straight Ltd uses a third-party service to help maintain the security and performance of the Talk Straight and Schools Broadband websites. To deliver this service it processes the IP addresses of visitors to our website.

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## E-newsletter

We use a third-party provider, Campaign Monitor, to deliver our customer e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For more information, please see Campaign Monitor's security and compliance policies: <https://www.campaignmonitor.com/trust/>

## Other websites

Our website contains links to other websites. This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## Schools Browsing Data

We are required by law to retain browsing data for a period of two years. This browsing data is stored on secure servers, protected by enterprise grade firewalls, within the Equinix Data Centre at Harbour Exchange, London. Every calendar quarter we will purge data over two years old. The software on these servers is provided by Netsweeper and Lightspeed Systems.

## Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web usage. This privacy policy was last updated on 15 May 2018.

## How to contact us

Please contact us if you have any questions about our privacy policy or information we hold about you:

Email: [gdprqueries@talk-straight.com](mailto:gdprqueries@talk-straight.com)

Write to: The Data Protection Officer  
Talk Straight Limited  
Units 2-4 Backstone Business Park  
Ilkley  
LS29 8JZ