



## PRIVACY POLICY

Ebroadband Communications Ltd (“Ebroadband”, “we”, “us”) is committed to protecting your privacy, be that when you visit our website, and/or provide us with information in when submitting an enquiry, or when you subscribe for and use our services. Ebroadband seeks to ensure the highest standards of compliance with all relevant Data Protection Laws and Regulations.

This policy applies to all personal data (“Personal Data”) in our possession and specifically includes the following: call traffic details, service usage data and customer information (including name, address, fixed line number, mobile number, email address and all other contact details), and your payment details, including bank account information.

In addition to existing data protection legislation and ePrivacy regulations, the General Data Protection Regulation (GDPR) requires that we give individuals specific information about what we are doing with their information. It sets out the detail that we should supply to individuals, and when we need to give it to you. Under the GDPR, the information we give to you about the processing of Personal Data must be:

- Concise, transparent, intelligible and easily accessible;
- Written in clear and plain language, particularly if addressed to a child; and
- Free of charge.

We endeavour to meet those obligations.

Where you provide us with your Personal Data in any of the ways described in below, you agree that we may collect, store and use it:

- (a) in order to perform our contractual obligations to you;
- (b) based on our legitimate interests for processing (i.e. for internal administrative purposes, data analytics and benchmarking (see below for more information), direct marketing, maintaining automated back-up systems or for the detection or prevention of crime);
- (c) based on your consent, which you may withdraw at any time, as described in this Privacy Notice.

## PERSONAL DATA USAGE

We need your Personal Data to;

- (i) provide service to you at a location, and arrange for the commissioning and installation of same;
- (ii) engage with you about delivery and service issues;
- (iii) communicate ongoing enhancements to, or issues with, the service,
- (iv) invoice you for the services,
- (v) collect payment from you for the services, and
- (vi) let you know about complementary services.

We have a legitimate interest in using Personal Data as part of the operation of our business and the provision of the services, but always balanced with your rights, and only where that legitimate interest is justified. Examples include using customer Personal Data to fulfil our service contract with you, get paid for the services we provide, for marketing, fraud prevention, intra-group transfers, or IT security. We may also have a legitimate interest in disclosing information about possible criminal acts or security threats to the authorities.

## PERSONAL DATA COLLECTION

We may collect Personal Data when you;

1. Register to use our websites applications or services; this may include your name (including business name), address, email address and telephone number. We may also ask you to provide additional information about your business and your preferences;
2. place an order using our website, applications or services;
3. complete online forms (including call back requests), take part in surveys, post on our message boards, post any blogs, enter any competitions or prize draws, download information or publications or participate in any other interactive areas that appear on our website or within our application or service;
4. interact with us using social media;
5. provide your contact details to us when registering to use or accessing any websites, applications or services we make available or when you update those details; and
6. contact us offline, for example by telephone, SMS, WhatsApp, email or post.

## SHARING YOUR PERSONAL INFORMATION

Recipients of Personal Data include outsourced billing providers to generate and/or dispatch invoices, credit reference checkers, collection agencies, marketing agencies, third party wholesale service providers (like *Open Eir, Siro, NBI, Three, BT Ireland*), outsourced installation technicians, equipment dispatchers, Regulators and law enforcement agencies. Please note that your information will be transferred outside of Europe, including to Canada and the United States.

We use Google Analytics. You can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/> . You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout> .

You can also opt out of targeted advertising by:

FACEBOOK - <https://www.facebook.com/settings/?tab=ads>

GOOGLE - <https://www.google.com/settings/ads/anonymous>

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

## DATA RETENTION

We are obliged to retain certain client information to ensure accuracy, to help maintain quality of service and for legal, regulatory, and legitimate business purposes.

We are required by law to retain client information and transaction records for six years from the end of the client relationship or the date of the last transaction respectively. No other information will be retained for longer than necessary for the purpose for which it was obtained by us or as required or permitted for legal, regulatory and legitimate business purpose.

## WE USE COOKIES

Ebroadband uses cookies for the purpose of storing and retrieving session information in our online systems, storing user preferences and for analysing traffic on our site. For more information on your browsing history and our use of cookies, please see our cookie policy <https://ebroadband.ie/wp-content/uploads/2021/06/Cookie-Policy.pdf>



## **YOUR RIGHTS**

You have the right to access Personal Data we hold about you and to ask that your Personal Data be corrected, updated, or deleted. If you would like to exercise this right, please contact us through the contact information below.

Where you have given your consent to the processing of your of Personal Data, you may withdraw that consent in writing at any time, by notification to the address below. Note in addition to, or instead of your explicit consent, we may also rely on our legitimate interest as a lawful basis for processing your Personal Data, and that legitimate interest may survive the withdrawal of consent. At a minimum, while you are a customer, (or while we are owed outstanding payments), we will need to provide the service, attend to faults, and invoice and collect payment for the service.

If you consider that the processing of Personal Data infringes the GDPR, you have the right to lodge a complaint with the office of the Data Protection Commissioner.

## **CHANGES**

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

## **CONTACT US**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by email at [info@ebroadband.ie](mailto:info@ebroadband.ie) or by mail using the details provided below:

Ebroadband Communications Ltd, 5 Main Street, Edgeworthstown, Longford, N39AH64.