



# **Fleur Telecom Policies**

### **Customer Rights Regarding Sales and Marketing of Fixed-Line Telephony Services**

Fleur Telecom and all other UK communications providers are regulated under Ofcom's General Conditions of Entitlement. These regulations apply to anyone who provides an electronic communication service or an electronic communications network. More specifically, General Condition C7 regulates how communications providers are able to market and sell fixed-line telephony services to customers. Full details of General Condition C7 are available [here](#).

### **Customer Rights Regarding Sales and Marketing of Mobile Telephony Services**

Fleur Telecom and all other UK communications providers are regulated under Ofcom's General Conditions of Entitlement. These regulations apply to anyone who provides an electronic communication service or an electronic communications network. General Condition C8 regulates how communications providers are able to market and sell mobile telephony services to customers. Full details of General Condition C8 are available [here](#).

To view a summary of General Condition C8, please click [here](#).

### **Accessibility and Vulnerability Services**

We want to support additional requirements for any customers with specific needs in relation to any accessibility difficulties or vulnerability they may be experiencing. For information on the supporting services available to our customers, please click [here](#).

### **Traffic Management**

Please click [here](#) to view our Traffic Management Policy.

Compensation Due to Porting Delays

Please click [here](#) to view our Porting Delays Compensation Policy.

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Special category data, such as data about your racial or ethnic origin, your physical or mental health or your religious beliefs, and data relating to criminal convictions and offences require additional protection. We try to limit the circumstances in which we collect sensitive personal data of this kind and will only process this type of data with your explicit consent.

The provision of some data is a contractual requirement or a requirement necessary to enter into a contract. You are not obliged to provide this data, but if you do not, then we may be unable to enter into a contract with you or fully perform the contract we have entered into with you. In some cases, it may lead to the termination of your contract with us. We can only use your personal data if we have a proper reason for doing so. We will only use your data for one or more of these reasons:

- To fulfil a contract we have with you or take steps in order to enter into a contract with you
- If we have a legal duty to use your data for a particular reason
- When you consent to it
- When it is in our legitimate interests

Legitimate interests are our business or commercial reasons for using your data, but even so, we will not unfairly put our legitimate interests above what is best for you. Where we use your data for market research, training and defending or bringing claims, we do so because it is in our legitimate interests of developing and running an efficient and effective business.

### 3. Uses made of the information

We may use information held about you in the following ways:

- to ensure that content from our website is presented in the most effective manner for you and for your computer
- to provide you with information, products or services that you request from us or which we feel may be of interest to you
- to audit the usage of our website
- to carry out our obligations arising from any contract entered into between you and us or take steps to enter into a contract with you
- for training purposes, quality assurance or to record details about the products and services you order from us
- to satisfy and meet our legal and regulatory requirements
- to allow you to participate in interactive features of our services when you choose to do so
- to notify you about changes to our products and services
- to carry out market research
- to defend or bring claims
- to improve our business and the products and services we offer
- to monitor and improve our marketing content



We will only retain your personal data for as long as is necessary. The retention period will vary depending on the type of personal data concerned. In order to determine the retention period we take into account the nature of the personal data, the purpose(s) for processing it, your relationship with us, any legal and regulatory requirements and any industry standards and guidelines. Once we no longer need your personal data, it will be securely destroyed.

#### **4. Disclosure of your information**

Fleur is part of the Telecom Acquisitions Group of companies and we may disclose your personal information to any member of the Telecom Acquisitions group of companies.

We may disclose your personal information to third parties if we are under a duty to disclose your personal information in order to comply with any legal or regulatory obligation; in order to enforce or apply our terms and conditions and other agreements; or to protect the rights, property, or safety of our customers or others. This includes sharing information with third parties in order to assist with the services and products we are providing to you such as business partners, network operators, customer service providers and payment transaction services. In the event that the business is being sold, merged, reorganised or similar we may disclose your data to prospective buyers.

Where we share your personal data with other organisations, we will take all reasonable measures to make sure it is properly protected, as far as is possible.

#### **5. Transfers of data outside of the EEA**

In order to provide you with requested products and services we may need to transfer your personal information to service partners based in countries outside the European Economic Area (EEA). This does not diminish your rights. Where such transfers do occur, we will ensure your personal data is protected in a manner that is equivalent to the way it would be protected within the EEA and in accordance with this Privacy & Cookies Policy. We will only make such a transfer where:

- A decision has been made by the European Commission that a place provides adequate protection for your personal data; or
- We have put appropriate safeguards in place to protect your personal data such as standard contractual clauses; or
- We rely on a specific ground for the transfer (called a derogation), such as your consent.

If you would like details of the specific safeguards in place, please contact us using the contact details at the end of this policy.



## 6. IP addresses and cookies

### 6.1 IP addresses

We may collect information about your computer, including where available your IP address, operating system and browser type for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

### 6.2 Cookies

Cookies and other similar technologies, such as pixels and web beacons, (we will refer to all similar technologies as cookies) store information on your device or access data from your device.

We use cookies on our website to recognise your device and store information about your preferences or past actions, which help make your future website visits to us more efficient. They do not store any personal information as they are designed only to collect information of an anonymous nature. We will not combine such anonymous information with your personal details.

We also use cookies in some of our emails to gather statistics around email openings and clicks to monitor and improve our content.

Save for the use of cookies, we do not automatically log data or collect data. You can set your computer browser to reject cookies but this may preclude your use of certain parts of our website or emails.

Some cookies are essential to using the website and others improve user experience of the website. Below are some examples of how we use cookies to do this:

- To gather information which allows us to identify your platform and record enquiries so we may improve customer experience and identify issues on the website
- To help ensure you are provided with correct and useful information during your visit to our website
- To collect data which allows us to improve our content and services based on your purchases, website usage and email interactions

### 6.3 Cookies in use

The cookies we use, the reason for using them and the duration for which they are stored, are described below.



First-party cookies are cookies that belong to the same domain that is shown in the browser's address bar (or that belong to the sub domain of the domain in the address bar).  
Fleurtelecom.co.uk

| Cookie Name | More Information   | Duration/Expiry |
|-------------|--|-----------------|
| _ga         | Google Analytics cookie. Used to distinguish users but not identify them | 2 years         |
| _gat        | Google Analytics cookie. Used to throttle requests                       | 1 minute        |
| _gid        | Google Analytics cookie. Used to distinguish users but not identify them | 24 hours        |

### Twitter

For more information on Twitter cookies see:

<https://help.twitter.com/en/rules-and-policies/twitter-cookies>

| Originating Domain   | Cookie Name   | Duration/Expiry                    |
|----------------------|---|------------------------------------|
| platform.twitter.com | <a href="https://platform.twitter.com/m">https://platform.twitter.com/m</a> | (Local Storage) no cookie selected |

### Facebook

For more information on Facebook cookies see:

<https://en-gb.facebook.com/policies/cookies/>

| Originating Domain                                   | Cookie Name  | Duration/Expiry |
|--|--|-----------------|
| <a href="https://www.facebook.com">.facebook.com</a> | fr   | 90 days         |
| _gat   | Google Analytics cookie. Used to throttle requests                       | 1 minute        |
| _gid   | Google Analytics cookie. Used to distinguish users but not identify them | 24 hours        |



In addition to the cookies we use on our website, we also use similar technologies in our emails so we know whether an email has been delivered, opened and interacted with.

We may from time to time, via secure means, upload data into Facebook, Google and LinkedIn. The data is 'hashed' so that it is an anonymous data sequence.

We may from time to time add different cookies to test systems to make your user experience better. We will not use or keep any of the data captured during these trials.

#### **6.4 Your consent to our use of cookies**

On our website there is a notice that tells you that we use cookies and provides a link to this Privacy and Cookies Policy to demonstrate how we use cookies and how you can change which cookies you choose to accept.

If you click 'agree and continue' you are providing your consent to those cookie settings and unless and until you change your settings, you've agreed to them. Additionally, if you change the settings using your browser settings, you are giving your consent to our use of those cookies which you have not disabled.

#### **6.5 How to reject and manage cookies**

You can choose not to allow cookies in your browser settings. How you do this will depend upon the browser you are using. More information on cookies, their use and how to accept or reject them can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).

If you do not wish to accept the cookies in our emails, you can choose not to download any images or click on any links or opt out of marketing. For more information, please refer to your email or device instructions.

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

As our cookies are largely aimed at improving the user experience on the website, you may find that if you block certain cookies you may experience deterioration in the service you receive.



## 7. Your rights and how to contact us

Data protection legislation provides you with the following rights regarding your personal data:

- The right to access a copy of the personal data we hold about you (commonly known as a subject access request (SAR))
- The right to rectify the personal data we hold about you where it is inaccurate or incomplete
- The right to have the personal data we hold about you deleted (commonly known as the right to be forgotten)
- The right to restrict the way we use your personal data
- The right to data portability e.g. to get your personal data from us in a commonly used and machine readable format or ask us to transfer it to another organisation
- The right to object to the way we process your personal data
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You can access and amend some data and opt out of marketing by using our privacy centre or logging into MyAccount.

In addition to these rights, if you gave us consent to use your data e.g. so that we can send you marketing emails, you can withdraw your consent at any time and free of charge. Information on how to do this is on each marketing email you receive as well as the preference centre.

Often, how we deal with data subject rights will be through our business as usual processes. There are some rights that we will always comply with, such as an objection to receiving direct marketing. However, we are not obliged to comply with all requests we receive. If there is a legitimate reason why we cannot comply with a request you make, for example a legal requirement may mean we have to keep your data even if you have requested that we delete it, we will let you know. We aim to respond to you within one month of receiving your request. However, we are permitted to extend this timeframe by an extra two months, where necessary. If this is the case, we will let you know within a month of receiving your request.





We will not charge you for exercising your rights, unless the request is manifestly unfounded or excessive, in which case we may charge a reasonable fee for our administrative costs or refuse to act on your request. We may also charge a reasonable fee for additional copies of data. We may require identification from you before we can consider your request. If identification or a fee is required or we are refusing to act on your request, we will let you know without undue delay.

If you have any queries about this policy or would like to exercise any of your rights you can contact our Data Protection Officer at [complaints@fleurtelecom.co.uk](mailto:complaints@fleurtelecom.co.uk) or at Global House, 60b Queen Street, Horsham, West Sussex, RH13 5AD.

Whilst we always endeavour to resolve your concerns, you also have the right to lodge a complaint with a supervisory authority. In the UK, this is the Information Commissioner. Please visit the Information Commissioner's Office's website for more information on how to do this – [www.ico.org.uk](http://www.ico.org.uk)

