

## Privacy Policy

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## 1. Who are Home Unity?

- 1.1. This Privacy Policy belongs to Home Unity Ltd, registered in England 14685025. Our registered address is: Home Unity Ltd, 2nd Floor College House, 17 King Edwards Road, Ruislip, London, HA4 7AE.
- 1.2. We provide broadband, telephony, mobile, TV, insurance and energy services to consumers in the UK.
- 1.3. We are responsible for your personal data as a Data Controller, under the General Data Protection Regulations (GDPR) 2018.
- 1.4. For any concerns regarding privacy, you can contact us at [info@homeunity.co.uk](mailto:info@homeunity.co.uk) or write to us at:

Data Protection Officer  
Home Unity Ltd  
2nd Floor College House,  
17 King Edwards Road,  
Ruislip,  
London,  
HA4 7AE

## 2. Who does this policy apply to?

- 2.1. This privacy policy applies to;
  - 2.1.1. Customers (past, present, and prospective)
  - 2.1.2. Individuals that use our website
  - 2.1.3. Authorised individuals acting under a power of attorney or with the express consent of the account holder
  - 2.1.4. Shareholders
- 2.2. Our products and services are intended for adults, aged 18 or over, and we do not knowingly collect or process personal data relating to children or anyone aged under 18 years.
- 2.3. It is important that our customers personal data is accurate and current. It's your responsibility to keep us up to date if you make any changes to your personal data by contacting us.

## 3. How do we collect your information?

### 3.1. Information you give us:

- 3.1.1. When you place an order with us for any of our services (for example on the website, through social media links, over the phone or through a third party), we will need certain information to process your order.
- 3.1.2. When you contact us to discuss your services, we will ask for information to be able to confirm your identity, check our records and help you with your query.

## Key Points

Your data is protected under the General Data Protection Regulations (GDPR) 2018.

If you have any concerns about your data or privacy, you can write to us or email [info@homeunity.co.uk](mailto:info@homeunity.co.uk)

Any user who visits our website, is a prospective customer or becomes a customer will have this policy apply to them.

It is your responsibility to let us know if any of your personal information changes (Name, address, contact details etc).

We collect information when you discuss or place an order with us, either directly or through external companies.

We use your personal information to check we are speaking to the correct customer, when carrying out DPA checks.

3.2. If you complete any survey or enter any competitions we may ask for information about you, which we will make clear to you at the time and let you know how we will be using this information.

### 3.3. Information we collect automatically:

3.3.1. We will automatically collect information:

- 3.3.1.1. When you use our services; and
- 3.3.1.2. When you visit our websites or portals, we may collect and process information about your usage of these by using “cookies” and other similar technologies to help us improve the websites and services available to you.

### 3.4. Information we receive from other sources:

- 3.4.1. We may receive personal data about you from third parties and other entities, publicly available in the following categories:
  - 3.4.1.1. Companies contracted by us to help us provide services to you;
  - 3.4.1.2. Other telecommunications operators when transferring services;
  - 3.4.1.3. Marketing or market research organisations;
  - 3.4.1.4. Credit reference agencies or fraud prevention agencies.

## 4. What data do we collect?

- 4.1. We collect personal data, which is defined as any information that can identify a natural person. We may collect, use, store and transfer different categories of personal data to enable us to deliver our services, as follows:
  - 4.1.1. **Your Identity data**, including your full name, title and date of birth;
  - 4.1.2. **Contact information data**, including addresses, email address and telephone numbers;
  - 4.1.3. **Financial data**, such as your bank account details for any direct debit and your payment card details for any recurring card payments;
  - 4.1.4. **Transactional data**, such as details about payments and products and services you have purchased from us;
  - 4.1.5. **Technical data**, such as your IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, online chat logs and other information on the devices you use to access our services;

### Key Points

Our website, like most these days, use cookies to collect information.

You can reject certain cookies when you go onto the site, but some are mandatory for the website to function properly.

We work with third party companies for marketing and other activities that will pass on your information to us. In this case, the third party is responsible for ensuring it is clear to you that your information is being passed to us, as this is their contractual obligation with us.

We collect a range of personal data, from who you are, your contact details, your payment and banking details, your history with Home Unity, service and usage data and vulnerability and accessibility needs.

We only collect data that is required for the intended purpose. If we don't need to collect a certain piece of data, we won't ask for it.

- 4.1.6. **Online account data** for your Home Unity account, such as your username, marketing preferences, feedback and survey results:
  - 4.1.7. **Service Usage data**, such as when you make a call, the number you called, destination and duration, what products you receive and have available to your property, the devices, set up or configurations you have or might require to use the services:
  - 4.1.8. **Marketing data**, such as how you would like to be contacted, how frequently and what type of content:
  - 4.1.9. **Special categories of data**, such as any accessibility or vulnerabilities that we need to be aware of to deliver our services.
- 4.2. We may also collect and use non-personal data, such as statistical or demographic data to help us identify our products and services. This data may come from your personal data but is not considered personal data as this data cannot identify you.

## 5. How do we use your data?

- 5.1. The data we collect helps us better understand the products and services you need from us and how we can improve them for you.
- 5.2. We use the data collected for example to:
  - 5.2.1. Verify your identity;
  - 5.2.2. Process your enquiries, orders or applications;
  - 5.2.3. Carry out credit checks;
  - 5.2.4. Monitor, record, store and use any telephone, e-mail or other electronic communications with you for training, monitoring and complaint purposes, so we can check any instructions given to us and to improve the quality of our service, and in order to meet our legal and regulatory obligations;
  - 5.2.5. Where you have agreed, provide you with information about other products, services and offers which you may be interested in;
  - 5.2.6. Tell you about changes to our terms, services, products or websites;
  - 5.2.7. Analyse personal data and/or marketing data, by profiling or creating statistical or testing information so we can improve the services we offer you and to understand our customers needs, demands and usage better;
  - 5.2.8. Recover any monies you owe us for your services;
  - 5.2.9. Analyse our services with the aim of improving them;

### Key Points

Sometime we collect non-personal data for the purpose of statistics, which we use to improve the products and services. This is not classed as personal data as it cannot identify you.

We use your data in various ways, from helping us make decisions on the products and services we offer, to the day to day operations, like making sure we're speaking to the correct person or preventing fraud.

There are certain regulatory actions we need to carry out using your data, such as informing you of key changes to our terms and conditions, the services, products or our website.

All conversations with you and Home Unity are recorded on the system, usually for 12 months, unless laws or regulations requires us to hold the data for longer.

5.2.10. Prevent or detect a crime, fraud or misuse of, or damage to our network, and to investigate where we believe any of these have occurred.

5.3. Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law.

5.4. We may supplement the data directly collected by us with data from third parties (for example socio-demographic data, credit reference agencies and fraud prevention agencies etc.) to improve the quality and accuracy of the data

## 6. When and who do you share my data with?

6.1. We need to share your data with third parties to enable us to provide the services to you.

6.2. The different categories of third parties we would share your details with are:

6.2.1. Our third-party suppliers to help us provide the services;

6.2.2. Regulators, such as Ofcom and the ICO;

6.2.3. Professional bodies, such as BSI for maintaining accreditations;

6.2.4. Professional advisors, such as Solicitors;

6.2.5. Law enforcement agencies;

6.2.6. Other companies as part of the process of selling one or more of our businesses or part of those businesses.

6.3. Where we share your information third parties, they are contractually required to follow our express instructions regarding the use of your personal information, and they must keep all records of your data within the EU and must comply with all applicable UK data protection laws.

## 7. Why do we process your data?

7.1. We process each type of personal data for one the following reasons:

7.1.1. We need to process the data under our contract with you for our services;

7.1.2. We have a legitimate interest under GDPR as a business processing your data;

7.1.3. We have a legal obligation to process the data; or

7.1.4. We have your consent (which you can withdraw at any time).

### Key Points

We may update your data record with information from third parties, such as credit reference agencies.

We need to share your data with third parties to fulfil your services. There are many companies involved behind the scenes to put all the pieces together. From the software providers to the engineers installing the services or even the post person delivering the parcel to your door.

We don't sell your data to any third parties, and we don't pass on any data unless it is required to do so.

Regulatory bodies, professional bodies and law enforcement agencies may require us to share data with them. There are strict rules and guidelines in place when this happens.

We process your data to provide you with services, because we have your consent or before we have legitimate interest or a legal obligation.

7.2. If you don't provide us with the data we need then we may not be able to perform our contract with you and may need to terminate the contract. If this happens we will notify you as set out in our Terms and Conditions.

## 8. What happens with data transferred outside the UK?

8.1. From time to time the external companies we work with may share our data outside of the United Kingdom in countries that do not always have the same standard of data protection laws as the UK. We always prioritise keeping data within the EU areas, rather than worldwide so the standard of protection under GDPR is consistent across the continent. In some instances, our external company may not be able to keep the data in the UK or EU. In this instance, we will have a contract in place to ensure your information is suitably protected, and we will remain bound by our obligations under applicable UK data protection laws even when your personal information is processed outside of the UK.

## 9. How long do you keep my data for?

- 9.1. Unless there is a specific regulatory or legal requirement for us to keep your information longer, we will keep your information for as long as it is necessary for the purpose for which it was collected. This is usually around a period of 6 years from the last transaction date for most activities.
- 9.2. Each type of data is covered by our Data Retention policy, where we assess the need to keep the data, any risks and the purpose in having the data. Based on this and other factors, we can then determine the length of time that each piece of data is kept for.
- 9.3. If you have any questions around certain types of data and the retention periods, then you can contact us using the details in section 1.

## 10. Do you guarantee my information protected?

- 10.1. We take information security and data protection seriously and have a range of controls in place to do our utmost in protecting you against unauthorised disclosure or processing.
- 10.2. We cannot guarantee the security of transmitting information via the internet, such as home or private networks. We have tried to create a secure and reliable website for our customers in line with industry standards. However, we have no responsibility or liability for the security of personal information transmitted via the internet.

## 11. What are my privacy and data rights?

- 11.1. Under GDPR, you are classed as a data subject, with this you have several personal rights under data protection laws in relation to your personal data. These are:
  - 11.1.1. **Subject access requests** - You have a right to access personal data that we hold as a data controller.

### Key Points

If we don't provide you with the data we need to fulfil the contract, then we might need to cancel the contract.

Our preference is to keep your data within the UK, and when not possible within the EU as a secondary choice.

EU countries have strict rules under GDPR which helps keep your information safe. If we can't keep your data in the UK or EU with certain suppliers, then strict contracts and information security controls are required by us.

The amount of time we keep your data for depends on the type of data, but typically most data is kept for 6 years.

We can't guarantee the security of transmitting information via the internet and we are not responsible or liable for this.

You have certain rights under GDPR that gives you controls over your personal data.

11.1.2. **Right to be forgotten** - In certain circumstances you have a right to request that your personal data be erased from the systems within our control.

11.1.3. **Rectification** - You have a right to correct your personal data that we hold as a data controller.

11.1.4. **Withdraw consent** - Where we have offered you the right to consent to giving us your data, for instance with your marketing preferences, you have the right to withdraw your consent at any time.

11.1.5. **Objection and restriction of processing** - In certain circumstances, you have a right to object to or request we restrict our processing of your personal data.

11.1.6. **Right to port** – You have a right to receive certain information about you in a machine-readable format.

11.2. If you would like more information about these rights or how to apply them, then please contact us using the details in in section 1.

## 12. How do I complain about use of my personal data?

12.1. We are committed to having a strong information security culture, but sometimes things can go wrong. If you need to make a complaint about our use of your personal data, please contact us using the details in section 1.

12.2. If we have not resolved your complaint, which should take less than 8 weeks, you can contact the UK data protection regulator, the Information Commissioner’s Office (ICO) ([www.ico.org.uk](http://www.ico.org.uk)).

12.3. We would appreciate it if you could give our team the opportunity to resolve any data complaints before reaching out to the ICO for assistance.

## 13. What happens if this privacy policy changes?

13.1. We review all of our policies on a regular basis, and it is likely this policy will change.

13.2. Any changes to the policy will be communicated via a new policy on our website.

13.3. Where the policy change is of a material detriment to our customers, as defined under Ofcom’s General Conditions, we will issue the appropriate 30 days’ notice to any customers impacted to a material detriment of any change.

### Key Points

The most common request for data is a Subject Access Request (SAR). We have 28 days to provide you with the information you requested.

Other common requests are withdraw consent, for example opting out of marketing.

Right to be forgotten (11.1.2) may not be possible to complete, as contractual law requires us to hold on to certain records for 6+ years.

If you have any complaints about the use of your personal data, or concerns, firstly contact us at [info@homeunity.co.uk](mailto:info@homeunity.co.uk) before escalating to the Information Commissioners Office (ICO).

This policy will be periodically updated on our website.

If there are any changes to this policy that significantly impact you, we will let you know in line with the Ofcom General Conditions on contract modifications.