

Porrima Privacy Policy

At Porrima we recognise the importance of the privacy and security of both your personal information and that of your customers.

This privacy policy explains what we do to look after your personal data and your customers' data.

The privacy policy will provide information on the following:

- Where and how we collect your personal information and your customers' information
- What we do with this information and how we keep it secure
- What your privacy rights are and how the law protects you
- How we look after your personal data
- Your rights over any personal information we hold about you and your customers
- How to contact us with any queries that you have

1. Important information

a. What does this privacy policy cover?

This privacy policy applies to you if you work with or receive services from Porrima Ltd, whether this be online, by telephone, in person, through written forms, via our website, through our mobile applications and software tools, or interacting with us on social media.

This privacy policy demonstrates our commitment to protect your personal information and your customers' data. It is followed by all members of the team at Porrima.

It is important that you read this privacy policy together with any additional privacy information which we may provide on specific occasions when we are collecting or processing personal data about you and your customers, so that you are fully aware of how and why we are using this data.

b. Contact us

If you would like to exercise one of your rights as explained in this privacy policy, or if you have a question or complaint about this privacy policy or the way in which your personal information and that of your customer is processed, please contact us using one of the following methods:

- By email: dataofficer@porrima.co.uk
- By post: Porrima Ltd, Data Officer, Europa House, Barcroft Street, Bury, BL9 5BT
- By telephone: 0800 331 7787

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

c. *Your duty to inform us of changes*

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data or relevant information relating to your customers changes during your relationship with us.

2. The data we collect about you and your customers

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may access, collect, analyse, store and transfer different types of personal data about you and your customers. We have grouped these different types into categories and provided some examples of each category below:

- **Identity Data** includes first name, last name, username or similar identifier
- **Contact Data** includes company address, billing address, delivery address, email address, and fixed line and mobile telephone numbers
- **Payment Data** includes bank account, details about payments to and from you, and other details of products and services which you have purchased from us
- **Employment Data** includes job title and employment ID
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our software applications
- **Profile Data** includes your username and password, administration levels and credentials, and commercials such as revenue shares, commissions and advances
- **Usage Data** includes information about how you use our website, products and services
- **Customer Usage Data** includes login details for online customer billing portals, summary and itemised usage data from mobile and fixed line billing in all formats
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences

We also collect, use and share **Aggregated Data**, such as statistical data, for any purpose.

Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature in our proposal management software application. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

Where we need to collect personal data by law or under the terms of a contract which we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a Tariff Analyser

Report), In this case, we may have to cancel a product or service that you have with us but we will notify you if this is the case at the time.

3. How is your personal data and your customers' personal data collected?

We use different methods to collect data from and about you and your customers including through:

- **Direct interactions**

You may give us your Identity, Contact, Payment, Employment, Profile, Customer Usage, and Marketing and Communications Data in person, by filling in forms on paper, online or electronically, by corresponding with us by post, telephone, email or otherwise, or providing information as part of a contract. This includes personal data you provide when you:

- Apply for our services
- Apply to provide goods and/or services to us
- Create a user account on our software applications
- Create a customer record on our software applications
- Request a Tariff Analysis of a customer account
- Submit information via our website
- Submit information via another method of correspondence
- Subscribe to our services
- Request marketing material to be sent to you
- Provide us with feedback and testimonials

- **Tariff Analysis**

We access and use Customer Usage Data via a range of network and provider online portals, disk systems, CSV billing files, PDF bills, paper bills, and photocopied or scanned paper bills as part of a contract.

- **Automated technologies and interactions**

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

- **Third parties or publicly available sources**

We may receive personal data about you from various third parties and public sources as detailed below:

- Identity and Contact Data from data brokers or aggregators
- Technical Data from analytics providers
- Identity, Employment and Contact Data from publicly available sources such as Companies House

4. How we use your personal data and your customers' personal data

We will use your personal data and your customers' personal data only when the law allows us to do so. Most commonly, we will use your personal data and your customers' personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending directing marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

a. Purposes for which we use your personal data and your customers' personal data

Please see the table below in which we outline a description of all the ways in which we plan to use your personal data and that of your customers, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Please note that we may process your personal data and that of your customers for more than one lawful ground, depending on the specific purpose for which we are using your data. Please contact us should you require further details about the specific legal ground we are relying on to process your personal data where more than one ground has been specified in the table below.

Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact (c) Payment (d) Employment	(a) Performance of a contract with you (b) Necessary for our legitimate interests in developing our relationship with you as a potential customer
To deliver agreed services to you (or prepare for their delivery)	(a) Identity (b) Contact (c) Payment (d) Technical (e) Profile (f) Usage (g) Customer Usage (h) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests in delivering a product/service we offer, and monitoring and reporting on contract progress

<p>To manage our relationship with you which will include:</p> <p>(a) Managing your account and providing support services</p> <p>(b) Notifying you about changes to our terms or privacy notice</p> <p>(c) Asking you to leave feedback or provide a testimonial</p>	<p>(a) Identity (b) Contact (c) Payment (d) Profile (e) Usage (f) Customer Usage (g) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests in keeping our records updated and studying how customers are using our products/services</p>
<p>To use data analytics to measure and report on the performance of our services</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage</p>	<p>(a) Performance of a contract with you</p>
<p>To administer our day-to-day business operations, including enabling you to access our products/services, meeting our legal obligations in carrying out our business, and assessing applications to deliver services to us</p>	<p>(a) Identity (b) Contact (c) Payment (d) Profile</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests in ensuring our business functions as cost-effective, compliant and accessible</p>
<p>To administer and protect our business and our software applications (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data), including measure or understand the effectiveness of our website, products and services</p>	<p>(a) Identity (b) Contact (c) Technical (d) Profile (e) Usage (f) Customer Usage (g) Marketing and Communications</p>	<p>(a) Necessary to comply with a legal obligation</p> <p>(b) Necessary for our legitimate interests in running our business, providing administration and IT services, ensuring network security, preventing fraud</p> <p>(c) Necessary for our legitimate interests in studying how customers use our products/services, to develop our products/services, to grow our business and to inform our marketing strategy</p>
<p>To make suggestions and recommendations to you about goods, services, and opportunities that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Profile (e) Usage (f) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests in developing our products and services and growing our business</p> <p>(b) Your consent, where this is required by law</p>

b. Marketing

We strive to provide you with choices regarding personal data uses, particularly in relation to marketing. We have established the following personal data control mechanisms:

- Promotional offers from us

You will receive marketing communications from us if you have requested information from us or if we can demonstrate that we have a legitimate interest in sending marketing material to you (and you have not opted-out).

- Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time. Once you have opted out of our marketing activity your data will be deleted from our marketing records within 48 hours.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

c. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

d. Change of purpose

We will use your personal data only for the purposes which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to obtain an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

We would like to stress that Customer Usage Data is used solely for the purpose of providing Tariff Analyser Reports as part of a contract with you.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, on compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to disclose your personal data with external third parties as highlighted below for the purposes established in the table in paragraph 4 above. These external third parties must all meet our standards of data and security. We share only information which allows them to provide their services to us or facilitate them providing our services to you. Examples include:

- IT administration and/or management services, including organisations which host our server
- Debt recovery agencies, should these be required
- HM Revenue & Customs, regulators and other authorities who require report of, or access to, processing activities in certain circumstances
- Email addresses stored on a third party email marketing system

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes. We permit them only to process your personal data for specified purposes and in accordance with our instructions.

Should we choose to sell, transfer, or merge parts of our business or our assets, we may have to share your personal data with such third parties. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens in our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

6. Data security

We have established appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data and that of your customers to those employees, agents, contractors and other third parties who have a business need to know. They will process your personal data only on our instructions and they are subject to a duty of confidentiality.

Similarly, we have established appropriate security measures to prevent any third party data which you provide to us from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have established procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

We will retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any contractual, legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we have process your personal data, and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data. Please see further information in the Glossary below.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please refer to the Glossary below to find out more about these rights:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

With regards to third party data which is provided to us, e.g. network/distributor bulletins and commercials, we will be unable to grant a transfer of this data to an editable format for your personal use. This third party data would constitute non-personal data and providing it to you in an editable format has the potential to result in a breach of privacy and legal action against both you and us. This is because the data could be distributed or manipulated after transfer, with legal and commercial implications as a result, were the third party to become aware of this and subsequently deciding to take action. In such circumstances, we recommend that you contact the third party directly to request the data in your desired format.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Glossary

a. Lawful basis

- **Legitimate interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data and that of your customers for our legitimate interests. We do not use your personal data and that of your customers for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Performance of Contract** means processing your data and your customers' data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation to which we are subject.
- **Consent** means any freely given, specific, informed and unambiguous indication of your wishes by which you, by a statement or by a clear affirmative action, signify agreement to the processing of your personal data and that of your customers.

b. Your legal rights

You have the right to:

- **Request access** to your personal data (known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), or where we may have processed your information unlawfully. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right applies only to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. This right does not apply to the transfer of third party data, as explained above.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.