



Privacy Policy

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F&W Networks respects your privacy and is committed to protecting your personal data. This Privacy Policy tells you why we need to collect your personal data, how we use and protect it and what your rights you are in relation to your personal data.

1. Important information and who we are

F&W Networks is a limited company registered in England and Wales with company number 11514559. Our registered office address is at 3rd Floor, 1 Ashley Road Altrincham, Cheshire, WA14 2DT.

In this Privacy Policy, “we”, “us” and “our” mean or refer to F&W Networks and references to “our website” mean the website at www.fwnetworks.co.uk

F&W Networks is the controller of and responsible for any personal data we hold and process about you.

If you have any questions about this Privacy Policy or our privacy practices, please contact us at:

Email address: legal@fwnetworks.co.uk

2. The data we collect about you

Personal data, or personal information, means any information about a person from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data: includes your name, marital status, title, and gender.

Contact Data: includes your address, email address and telephone number(s).

Transaction Data: includes details about payments you have made relating to services you have purchased from us.

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 services and our website.

Profile Data: includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.

Usage Data: includes information about how you use our website and services.

Marketing and Communications Data: includes your preferences in receiving marketing from us and your preferred communication channels.

Financial Data: (this includes your bank account and payment card details which you use to pay for our services) when you order our services. We pass your Financial Details to our trusted third-party payment provider, who collects any payments due to us from your bank account on our

behalf. We do not store any of your Financial Data after we have passed it on to our third-party payment provider.

We may collect, use, and share **Aggregated Data** (such as statistical or demographic data) for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users using our services at a particular time. 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.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Our website and our services are not aimed at children, and we do not knowingly collect any personal data relating to children.

3. How we collect your personal data

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

3.1 Direct interactions:

You may give us your Identity, Contact, Financial, and Marketing and Communications Data by filling in forms online or by contacting us by post, phone, email or otherwise. This can include personal data you provide when you agree to purchase our services, request information to be sent to you, enter a competition, promotion or survey, report a problem with our services or contact us for any reason.

3.2 Automated technologies or interactions:

As you use our services and interact with our website, we will automatically collect Technical, Profile and Usage Data including about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our Cookie Policy for further details about data we collect via our website.

3.3 Third parties:

We may receive Technical Data about you from our third-party website analytics providers. We may also receive Transaction Data about you from our payment provider, GoCardless, or any provider of credit checking facilities we may use.

4. How we use your personal data

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

- where we need to perform the contract that we are about to enter or have entered into with you
- where it is necessary for our legitimate interests (or those of a third-party) and your interests and fundamental rights do not override those interests or
- where we need to comply with a legal obligation

We have set out in a table below a description of all the ways we plan to use your personal data and the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Whenever we process your personal data under the 'legitimate interest' lawful basis, we make sure that we consider your rights and interests and will not process your personal data if we feel that there is an imbalance.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Generally, we do not rely on consent as a legal basis for processing your personal data.

Purpose	Type of data	Lawful basis for processing
To register you as a customer	a) Identity b) Contact	a) Perform our contract with you
To process your order and provide our services including carrying out any surveys or installation work, to manage fees and charges and to collect money owed to us	a) Identity b) Contact c) Transaction d) Financial e) Usage	a) Perform our contract with you b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: a) notifying you about any changes to our services, our standard terms, or Privacy Policy b) dealing with your requests and enquiries and responding to any complaints c) asking you to provide survey feedback d) maintaining our records	a) Identity b) Contact c) Profile	a) Perform our contract with you b) Necessary to comply with our legal obligations c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)

<p>To keep a record of communications with you and records of your use of our services</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Usage 	<ul style="list-style-type: none"> a) Perform our contract with you b) Necessary to comply with our legal obligations c) Necessary for our legitimate interests (to maintain our records, internal training, and quality assurance purposes to ensure our customer service standards and to analyse how customers use our services)
<p>To administer and protect our services and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (for running our business, provision of our services, network security, to prevent fraud) b) Necessary to comply with our legal obligations
<p>To use data analytics and tracking technologies to improve our website, services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> a) Technical b) Usage 	<p>Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about services we offer that may be of interest to you</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage e) Profile f) Marketing and Communications 	<ul style="list-style-type: none"> a) Necessary to comply with our legal obligations b) Necessary for our legitimate interests (to develop our services and grow our business)

5. Marketing

You will receive marketing communications from us if you have requested information from us or subscribed to our services and you have not opted out of receiving that marketing.

You can ask us to stop sending you marketing messages at any time by emailing or calling us using the contact details set out in Section 1 or by following the opt-out links in any marketing message sent to you.

If you opt out of receiving marketing messages from us, we will continue to send you service-related communications in relation to your use of our services.

6. 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. For more information about the cookies we use, please see our Cookie Policy.

7. Changes to your personal data

It is important that the personal data we hold about you is accurate and current. Please tell us as soon as possible if any of your personal data changes (e.g., your email address or telephone number) whilst you are a customer.

8. Who we share your personal data with

We will only share your personal data with the people who need to have access to it so that we can provide the services you have requested. We will share your personal data with:

- Our employees and contractors to provide you with our services.
- Our partner organisations and subcontractors who provide some of the services on our behalf.
- Our trusted third-party payment provider.
- Credit reference agencies (to carry out credit checks) and debt recovery agencies (if you have outstanding payments).
- Our service-providers who provide us with services to support our IT tools and systems.
- Professional advisers including lawyers, auditors, and insurers.
- Third parties to whom we may choose to sell, transfer or merge parts of our business with.
- Regulators, ADR providers, government/industry bodies and authorities for the purpose of resolving disputes, complying with regulatory requirements, and reporting and in connection with obtaining grants or funding directly or on your behalf.

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 and only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. International transfers

Some of our external third-party suppliers are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

If you require further information on the specific mechanism used by us when transferring your personal data out of the UK, please contact us via email at the following email address: info@fwnetworks.co.uk.

8. Data security

We have put in place 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 to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place 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.

9. How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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 process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

By law we must keep basic information about you (including Contact, Identity and Transaction Data) for at least seven years after you cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Section 10 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

You have various rights in respect of the personal data we hold about you – these are set out in more detail below. If you wish to exercise any of these rights, you can do so by contacting us using the information at Section 1 above.

Access: you can ask us to give you a copy of the personal data that we hold about you (commonly known as a «data subject access request»).

Correction: you can ask us to change or complete any inaccurate or incomplete personal data we hold about you.

Erasure: you can ask us to delete your personal data where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.

Objection: you can object to our processing of your personal data where we are relying on a legitimate interest and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.

Restriction: you can ask us to restrict our use of your personal data in the following circumstances: 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) if you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Transfer: you can ask us to provide you or a third party with the personal data that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

Withdraw consent: if you have given us your consent to use personal data (for example, for marketing), you can withdraw your consent at any time.

You will not usually 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.

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 several requests. In this case, we will notify you and keep you updated.

11. Third-party links

Our website may include links to third-party websites, plug-ins, and applications as well as social media links. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

12. Complaints

If you have any comments or concerns about this Privacy Policy or our handling of your personal data, please contact us as soon as possible so that we can respond and take any action necessary to resolve your concerns.

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

13. Changes to our Privacy Policy

We keep our Privacy Policy under regular review. If we make any changes to our Privacy Policy, we will post an updated version on our website. Please check the policy as published on our website from time to time so that you are aware of how we use your personal data.