

toob privacy policy

This is the privacy policy of toob Ltd ("toob", or "we" or "our", or "us") whose company registration number is 11051348, and registered office is Building 4000 Lakeside North Harbour Western Road, PORTSMOUTH, England, PO6 3EN.

We respect your privacy and are committed to protecting your personal data. This means we will:

- use your data in a lawful, fair, and transparent way;
- collect your data for valid purposes that we have clearly explained to you and not in any way that is incompatible with those purposes;
- collect your data in a way that is relevant to the purposes we have told you about and limited only to those purposes;
- make sure your data is accurate and kept up to date;
- only keep your data for as long as necessary for the purpose we have told you about;
- keep your personal data safe and secure.

Our full privacy policy is found below, and we encourage you to acknowledge it then read through it in your own time.



ico.org.uk/yourdatamatters

In the United Kingdom, the Information Commissioner's Office (ICO) is the Supervisory Authority responsible for upholding information rights. For more information, please visit the ICO website (www.ico.org.uk/yourdatamatters).

Hyperlinks to third party websites outside the domain www.toob.co.uk are provided for the convenience of users only. toob is unable to provide any warranty concerning the accuracy or completeness of any information held within these third-party websites – this is the responsibility of the third-party website.

1. Who we are

toob is a data controller in respect of your personal data that you make available to us. That means we decide which personal information we need from people and what we do with it. For more information about our company, you can visit our website <https://www.toob.co.uk/about-us/>

We have a Data Protection Officer ("**DPO**") who is responsible for overseeing all matters related to data protection and privacy on behalf of our company. If you wish to contact our DPO, please send an email to helpdesk@toob.co.uk. Our full contact details are found in the section **Contact details and complaints**.

2. Personal data we collect

Our privacy policy tells you ("**you**", "**your**") how we use and look after your personal data when you are:

- a user of our website ("**user**"); or
- a subscriber of our service or products who is the individual named on the contract with us ("**subscriber**") or a pre-approved representative of that person ("**representative**"); or
- an end user of our service or products, but not in the capacity of subscriber ("**end user**"); or
- an enquirer ("**enquirer**"); or
- a **complainant** ("complainant");
- a representative of a business or organisation that interacts with us or with which we have an ongoing business arrangement ("**business contact**");
- a person with an interest in land or property within our network build.

and when you:

- visit our website, www.toob.co.uk ("**website**");
- interact with us :
 - a. to place an order for our service or products,
 - b. to register your interest in our service or products,
 - c. to contact us to make a general enquiry, for customer service about installations, maintenance & repair, marketing related matters,
 - d. for business-related matters, or
 - e. regarding any other matter;

(whether in person, via telephone, email, letter, meetings, SMS, our customer portal, or other communications, referred to in this privacy notice as "**channels**");

- attend our on-site premises ("**attendance**");
- participate in any competitions we offer ("**competitions**"); or
- interact with us in any other way,

or when we have:

- obtained your personal data from public domain sources as detailed in **How we collect personal data**.
- obtained your personal data from a third-party provider that we have a contract with or subscribe to.

In this privacy policy, we also refer to each of these ways of interacting with us as “**communication channels**”. The interactions between you and us via the communication channels are referred to as “**communications**”.

We may show you other privacy notices, including those of third-party organisations, when we collect or share your personal data which apply in addition to this privacy policy.

We may collect the following information about you:

- **Financial data.** If you are a business contact, we receive transactional and financial information relating to you for the purposes of invoicing. We do not store subscriber financial information in our systems.
- **Information that directly identifies you.** This includes your name, address, email address, username, and password.
- **Information that indirectly identifies you.** We automatically receive and record information from your device or web browser when you interact with our internet service, website and toob Customer Portal, for example your MAC code, mobile device ID, time zone setting, location data, language preference, operating system, platform, and links you have clicked on or shared with others, including through email and social media. We may use this information to collect data about your activities on our website and portal and on third-party websites. We may associate information that indirectly identifies you with your subscriber account (if you have one) and other information we have collected about you.
- **Internet traffic data.** We collect internet traffic data to monitor the provision of service that we provide, which helps us identify and resolve problems. This includes information about you transmitted between us and your router. We are permitted to do this as we are a public communications provider as defined by the Privacy and Electronic Communications Regulations (PECR). For more information, you may wish to visit the Information Commissioner's Office website (www.ico.org.uk)
- **Location data.** We may collect geo-data, which tells us where you are, when we collect other information about you. We may link location data to other information we have collected about you.
- **Marketing and communications data.** This includes information about your subscriptions to our communications and your marketing preferences.
- **Profile data.** This includes your username and password and other information you give us (if you are a subscriber), information you give us in connection with orders you make, your preferences, feedback, and survey responses.

Special category data. We do not currently collect any special category data about you, however, should this ever change, we will notify you in advance of our intention



to collect it and ask for your consent to do so, and update this privacy policy accordingly.

3. Aggregated data

- We aggregate personal data we collect, such as the number and frequency of your visits to our website or toob Customer Portal, to produce metrics and statistical information. We may share this data with third parties in an anonymised format.
- We share aggregated, anonymized, information with our ad partners and service providers so that we, and they, can understand how people use our website, and interact with our social media and advertising campaigns; this helps us grow our business and improve and develop our products and services. These third parties may share information about you with us that they have independently developed or acquired in an anonymous format.
- We combine anonymised information about you with anonymous information about other users to create audience segments of aggregated data, for example, statistical, demographic and usage data. If, for any reason, we combine or connect aggregated data with personally identifiable information (that is, information that may identify you whether directly or indirectly), we treat the combined data as personal data and manage it in accordance with this privacy policy.

4. How we collect personal data

- We collect personal data when you give it to us directly, for example when you register your interest in our service, when you subscribe to our service, when you opt-in to our marketing communications, when you contact us by email, when you enter a competition, or contact us for any reason.
- We automatically collect personal data when you interact with our website and toob Customer Portal, for example, information about your devices and browsing actions via cookies and similar technologies. For more information on this, please see our [cookie policy](#).
- Third parties that we work with, such as analytics providers or ad networks, may give us your personal data, for the purpose of supplying our business with data.
- We may also collect your personal data from public domain sources (such as HM Land Registry and Companies House) and use this to contact you if we need to get in touch about building our network on land or property where wayleaves may be required from you.
- We may receive your personal data from third parties when you make payments to us. This includes your contact details and financial and transaction data from providers of payment and invoicing services. We do not store financial information such as bank account or credit card numbers from you.
- If you interact with us via Social Media websites or apps, the privacy notices of the specific social media platform will also apply.

- If you do contact us, we will keep a record of that correspondence either as part of an ongoing subscriber account or for other reasons (such as when you make a complaint). This is so we can contact you with any follow-up responses by email, and monitoring our correspondence helps improve our business.

5. Our lawful bases for processing your data

We only collect and use your personal data for the purposes shown below, unless we reasonably and lawfully consider that we need to use it for another reason that is compatible with the original purpose it was collected for. If we need to use your personal data for another purpose, we will explain the legal basis we rely on to you via this privacy policy.

We do not always need your consent to process your personal data; the table below shows how we use your personal data and the lawful basis(es) for processing it in each case. In some cases, more than one lawful basis applies.

This policy does not intend to limit any legal objections or defences you may have regarding the processing of your data, including requests to disclose your data to third parties.

Purpose	Type of Data	Lawful basis for processing
<p>Recognising you and analysing how you navigate our website or toob Customer Portal.</p> <p>This is done using cookies and similar technologies. Required cookies are necessary to enable the basic features of our website to function, such as allowing images to load.</p> <p>For an explanation and details on how you can manage cookies, please click here to see our cookie policy.</p>	Data that identifies you indirectly such as MAC code, mobile device ID.	Consent.
Communicate legal information to you.	<p>Data that directly identifies you such as your name, username.</p> <p>Data that identifies you indirectly such as MAC code, mobile device ID, location data.</p>	Compliance with a legal obligation.

Purpose	Type of Data	Lawful basis for processing
Analyse comments, feedback and reviews you have given us including those provided via our website, toob Customer Portal, social media, and review websites so that we can improve our service to you and others.	Data that directly identifies you such as your name, username or equivalent. Data that identifies you indirectly such as MAC code, mobile device ID, location data.	Legitimate interest.
Send you communications that you have opted-in to receive, including direct marketing communications.	Data that directly identifies you such as your name, username, email address, mobile number.	Consent.
Register you as a subscriber of our service and products.	Data that directly identifies you such as your name, address, username, email address, mobile number, and other information in your profile.	Creation or performance of a contract.
Fulfil orders for subscription(s) you have placed with us.	Data that directly identifies you such as your name, address, username, email address, mobile number, and other information in your profile.	Creation or performance of a contract.
Collect money you owe us. The financial data of our subscribers is not stored on our systems.	Data that directly identifies you such as your name, address, username, email address, mobile number other information in your profile, and financial and transactional data.	Creation or performance of a contract.
Communicate our terms and conditions to you, notify you about changes to them, and communicate with you about any contravention of these.	Data that directly identifies you such as your name, address, username, email address, mobile number, and other information in your profile. Data that identifies you indirectly such as MAC code, mobile device ID, location data.	Creation or performance of a contract.

Purpose	Type of Data	Lawful basis for processing
Communicate our privacy policies to you, notify you of changes to them, and communicate with you about any contravention of these.	<p>Data that directly identifies you such as your name, address, username, email address, mobile number, and other information in your profile.</p> <p>Data that identifies you indirectly such as MAC code, mobile device ID, location data.</p>	Compliance with a legal obligation.
Conduct surveys or undertake research about our service, products, and website so that we can improve the quality of service delivered to you and others.	<p>Data that directly identifies you such as your name, address, username, email address, mobile number other information in your profile, and may include information such as demographic data so we can understand our customers better.</p> <p>Data that identifies you indirectly such as MAC code, mobile device ID, location data.</p>	Consent.
<p>Ask you to take part in polls about our website, service and products or our other legitimate interests.</p> <p>This may be conducted via social media; in which case the privacy policies and other relevant terms and conditions of the specific social media platforms will also apply.</p>	<p>Data that directly identifies you such as your name, address, username, email address, mobile number, and other information in your profile.</p> <p>Data that identifies you indirectly such as MAC code, mobile device ID, location data.</p>	Legitimate interest.
<p>Invite you to take part in a competition, prize draw, or other promotional activity.</p> <p>We will notify you at the time you enter the competition, prize draw, or other promotional activity of any specific terms and conditions that may apply.</p>	Data that directly identifies you such as your name, username, email address, mobile number.	<p>Legitimate interest;</p> <p>Creation or performance of a contract.</p>
Conduct 'door-to-door' enquiry and sales services in the areas we intend to provide internet service.	Data that may indirectly identify you such as your address.	Legitimate interest.

Purpose	Type of Data	Lawful basis for processing
The general administration and protection of our company, including administrative and IT services, data analysis, testing, system maintenance, network security, fraud prevention and anti-money laundering, subscriber/end user support, hosting and reporting data, customer services and complaints management, wayleave management, including the exchange of information with third parties for general administration, complaint resolution, the prevention of fraud, information security breaches, expanding our network and other related matters.	<p>Data that directly identifies you such as your name, address, username, email address, mobile number, call recordings and transcripts, and other information in your profile.</p> <p>Data that identifies you indirectly such as MAC code, mobile device ID, location data.</p>	<p>Legitimate interest;</p> <p>Creation or performance of a contract;</p> <p>Compliance with a legal obligation.</p>
Use data analytics to improve our service and products and develop our marketing strategy.	Data that identifies you indirectly such as MAC code, mobile device ID, location data.	Legitimate interest.
Compliance with applicable law and regulatory or statutory obligations.	<p>Data that directly identifies you such as your name, address, username, email address, mobile number, and other information in your profile.</p> <p>Data that identifies you indirectly such as MAC code, mobile device ID, location data.</p>	Compliance with a legal obligation.
Maintain your minimised personal data on a classified suppression list if you have asked us to restrict/limit the processing of your personal data, including a record of data subject access requests on the right to be forgotten.	Data that directly identifies you such as your name, or a reference number.	Compliance with a legal obligation.
<p>For visitors to our HQ, a log of your entries and exits to the premises for the ongoing monitoring of the security of the premises and our staff.</p> <p>This data is also controlled by the operator of the premises.</p>	Data that directly identifies you such as your name, address, username, email address and other information in your profile.	<p>Legitimate interest;</p> <p>Protect vital interests.</p>

Purpose	Type of Data	Lawful basis for processing
For visitors in attendance at our HQ, a log of your access to our Guest Wi-Fi service. Separate terms & conditions, and acceptable usage policy apply that will be shared with you before you use the service.	Data that directly identifies you such as your name, address, username, email address and other information in your profile. Data that identifies you indirectly such as MAC code, mobile device ID, location data.	Legitimate interest; Compliance with a legal obligation.
For visitors in attendance at our HQ, your image is captured on our CCTV system. CCTV footage is also captured and managed by the operator of the premises; whose own privacy policy also applies in this case.	Data that directly identifies you, specifically your image.	Compliance with a legal obligation; Legitimate interest; Protect vital interests.
For members of the public in the vicinity of our remote sites, your image may be captured on our CCTV system.	Data that directly identifies you, specifically your image.	Compliance with a legal obligation; Legitimate interest; Protect vital interests.

6. Marketing

We will send marketing messages to you if you have opted-in by giving us your consent to do so. You can unsubscribe from our direct marketing communications at any time either by using the link provided in email messages, via your toob Customer Portal account (if you are a toob broadband subscriber) or by contacting our friendly customer service team, email helpdesk@toob.co.uk or call 0800 368 9458. For opening times visit <https://www.toob.co.uk/support/>.

Sometimes we work with third-party companies who provide products and services that may be of interest to you. When this applies, we will ask for your consent before sending your contact details on to the third party.

7. Service-related communications

You may not opt out of Service-related communications (e.g., account verification emails or SMS, purchase confirmations, billing reminders, changes/updates to features of our service, technical and security notices). This information is essential, and we have either a legitimate interest to send it to you or it is a contractual obligation according to the legal bases set out above.

8. Sharing personal data

- We collect your data to use within the toob legal entity.
- We share your data with third parties who process data on our behalf. These are companies that we have contracts with or subscribe to, to deliver specific

services, for example, email communications, SMS communications, internet installation, financial services, review websites, professional services advisors.

- We may need to share your personal information with landowners or freeholders to proceed with your order by obtaining their permission to build our network on their land or in their property. If you are the landowner or freeholder, we may share your contact details with approved third parties to contact you about obtaining wayleave consent on our behalf.
- We share your data with third parties to use it for their own purposes when you have given us your consent to do so, for example cookies and similar technologies.
- You share your personal data with third parties when you publish content publicly on social media, for example, comments, reviews, replies, blogs, articles, and advertisements.
- If at any time a change happens to our business, for example, we sell, transfer, or merge parts of our business we will share your personal data with the new owner who may use it in the same way as set out in this privacy policy.
- We may disclose your personal data if we are required to do so by law, for example, to assist with a criminal investigation, as a matter of national security, or to comply with a court order.
- When using your information, we do so primarily to fulfil our contractual and legal obligations. We may also share your information with certain third parties including our suppliers, partners, and sub-contractors for the performance of any contract we enter into with you and for the purposes set out in the table above. This includes third party recipients such as those who provide installation, payment, billing, or communications services (among others) on our behalf. We require all third parties to treat your data in accordance with our privacy policy. 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 data transfers

- When we process your personal data for the purposes outlined above, this may require transferring it outside of the UK, European Union (EU), and/or European Economic Area (EEA). When this is the case, we take all steps reasonably necessary to ensure that your personal data will have equivalent levels of protection as it would have in the UK, EU, or EEA.
- When we select third parties to work with and process personal data on our behalf, we make it clear that we expect standards to be in place that ensure the protection and safeguarding of your personal data and legal rights.

10. Looking after your data

- We have procedures in place to safeguard your personal information, which includes having appropriate security measures to prevent your data from being lost, used, altered, disclosed, or accessed in an unauthorised way whether accidentally or on purpose.
- We restrict the access and use of your personal data to our staff, agents, contractors, and third parties who need to access it to support you as part of their job roles. They are all subject to a duty of confidentiality and may only process your data as we have instructed them to do so and in accordance with our privacy policy.
- We make no guarantees that our security measures will prevent personal data breaches. We have procedures in place to identify and manage suspected data breaches: if we confirm a personal data breach has taken place that is likely to endanger your rights and freedoms, we will notify you, the Information Commissioner's Office (ICO), and, if necessary, any relevant competent authorities (e.g., Police, Government).
- If you are concerned that a personal data breach may have taken place you should contact us as soon as possible so that we can investigate this. Please call us on 0800 368 9458 (lines are open from 8.00am to 10.00pm Monday to Friday, 9.00am to 5.00pm Saturday and Sunday) or send an email to helpdesk@toob.co.uk if the suspected breach occurs outside our operating hours.

11. Your responsibilities regarding end users

If you, as a toob broadband subscriber, allow end users ("**them**", "**their**") (for example, your family and friends, visitors, staff, customers etc) to use the services and products covered by this privacy policy, you are responsible for:

- adequately informing them that we control their data because of their use of the services and products;
- obtaining any consents from them as may be legally required before their data is communicated to us about the services or products you allow them to use;
- adequately informing them about this privacy policy and how it applies to them including their rights on data protection & privacy and how they can exercise them;
- ensuring you do not use the services or products to collect or gain access to their data in an unlawful way or in a way that conflicts with this privacy policy;
- not doing, causing, or permitting anything that could in any manner or under any circumstances, result in any violation of applicable data protection law; and
- to comply with the relevant toob Terms & Conditions (visit www.toob.co.uk/legal and see either home broadband terms & conditions or business broadband terms & conditions)

12. Retaining your personal data

We keep your personal data for as long as reasonably necessary to fulfil the purposes for which it was collected, 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

13. Third party sites, apps, and platforms

Our website includes links to third party websites and social media platforms. When you click on those links it may allow third parties to collect or share data about you.

You agree that we are not responsible for, and we do not control those third-party websites or social media platforms. We encourage you to read the privacy policies and notices of those websites or platforms so you understand how they will process information about you.

14. Cookie policy

This website uses cookies and similar technologies to distinguish you from other users. This helps us to provide you with the best experience possible when you browse our website and allows us to decide which improvements to make to it. For detailed information on the cookies, we use and the purposes for which we use them see our [Cookie Policy](#).

15. Your rights

Data Protection law makes sure your data is used properly and legally, and you can exercise certain rights, which are summarised below. For more information, please visit the ICO website(www.ico.org.uk/your-data-matters).

- **Right to be informed if your personal data is being used**
We must tell you how we use your personal data, and you will find this information in section **Our legal bases for processing your data**. If you have any specific questions about this, you may contact us for further information.
- **Right to get copies of your data**
You have the right to find out if we are using or storing your information and to request copies of it.
- **Right to get your data corrected**

You can challenge the accuracy of the personal data we hold about you and we encourage you to let us know if the personal data you have given us have changed.

- **Right to get your data deleted**

You can ask us to delete personal data about you. In some circumstances it may not be possible for us to delete your data, for example, if there is a contractual or legal obligation for us to retain it for a specific time.

- **Right to limit how we use your data**

You can ask us to limit the way in which we use your personal data. In some circumstances it may not be possible for us to limit the use of your data, for example, if there is a contractual or legal obligation for us to process it for a specific purpose.

- **Right to data portability**

When we provide you with copies of your data, you have the right to request it from us in an accessible format that can be used again or elsewhere.

- **Right to object to the use of your data**

You have the right to object to the processing or use of your personal data under certain conditions. In some circumstances it may not be possible for us to alter the use of your data following your objection, for example, if there is a contractual or legal obligation for us to process it.

- **Rights relating to decisions being made about you without human involvement**

Automated decision-making takes place when an electronic system uses personal information to decide something without human intervention. We do not expect to make any decisions about you as an individual that involve automated decision-making and would place a significant impact on you; however, should that position change at any time we will notify you via this privacy policy.

- **Right to raise a concern**

We encourage you to raise any concerns you might have about how we use your data. Please see section **Contact details and complaints** below for more information.

15.1. How to exercise your rights

Please contact us to exercise your rights in relation to personal data. You will find our contact details below in section **Contact details and complaints**. You can help us by providing a detailed request, for example including information about yourself such as your name and any reference number and telling us if your request relates to data held on a specific date or series of dates.

When you contact us, it may be necessary for us to ask you to verify your identity as a security measure and this may involve requesting a copy of your personal identification (ID) such as passport or driving licence. Any such requests from us will be proportionate to the type of information requested.

If you allow a third party to contact us on your behalf, we will ask you to provide your written consent naming that third party, or for the third party to suitably demonstrate that they are acting on your behalf, whichever is most relevant to your circumstances.

We might need to contact you (or the third party) and ask for further information to help you exercise your legal rights, or to help us speed up our response time to you.

We are legally obliged to reply to your request within one month. If we are unable to complete your request within that time, we will always contact you to let you know. This might occur if your request is complicated and/or requires a significant amount of work to complete.

In certain circumstances exemptions may apply, or we may have an overriding legal basis for processing your personal data, which means we can decline your request. If that is the case, we will always contact you to explain why.

16. Contact details and complaints

We encourage you to raise your concerns with us in the first instance, so that we can try to resolve them.

Should you wish to make a complaint or raise a concern with us, our full contact details are as follows: -

Full name of legal entity: toob Limited (Registered company number: 11051348)

Contact: Data Protection Officer

Email address: helpdesk@toob.co.uk

Postal address: Building 4000 Lakeside North Harbour Western Road, PORTSMOUTH, England, PO6 3EN.

You have the right to make a complaint or raise a concern at any time about data protection and privacy matters to the Information Commissioner's Office (<https://ico.org.uk/global/contact-us/>).

17. Changes to this policy

Our privacy policy was last updated on 26 January 2022 and this published version supersedes any previous versions.

We review our privacy policy on a regular basis and will let you know about any significant changes to it if we have your contact details. In any event, the latest version will always be published here.

It is important that the data we hold on you are current so, please keep us up to date with this during our relationship with you.

If you have any questions about our privacy policy or would like to request a copy of a previous version, please contact us by sending an email to helpdesk@toob.co.uk.