



Customer Privacy Notice

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GCI Network Solutions Limited – Privacy Notice

At GCI Network Solutions Limited, we're committed to protecting and respecting your privacy at all times.

This statement provides an outline of when and why we collect personal information, how we use it and the conditions under which we may disclose it to third parties.

If you have any questions regarding this statement or our privacy practices in general, please email us at dpo@gcicom.net

1.1 What is personal data?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed in the European Union by the General Data Protection Regulation 2016/679 (the "GDPR"), by the Data Protection Act 2018 ("DPA") in the United Kingdom and also by the Privacy and Electronic Communications (EC Directive) Regulations 2002.

1.2 Who are we?

GCI Network Solutions Limited and the GCI group of companies, hereafter referred to as "GCI", is the data controller (contact details below). This means we decide how your personal data is processed and for what purposes.

GCI Network Solutions Limited
Global House
2 Crofton Close
Lincoln
LN3 4NT

1.3 Contact details of the Data Protection Officer

Our Data Protection Officer ("DPO") can be contacted by emailing dpo@gcicom.net

1.4 How do we process your personal data?

GCI complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To respond to enquiries that you have made;
- To process & fulfil an order that you have made;
- To conduct credit checks (where applicable);
- To manage your account;
- To provide support for your account;
- To carry out our contractual obligations where a contract is entered into by you and GCI;
- To seek your views or comments on the services and products that we provide;
- To notify you of changes to our services and products;
- To conduct fraud prevention & security checks.
- For internal record keeping;

1.5 Our legal basis for processing

Processing is necessary for the performance of a contract to which you have entered into with GCI or in order to take steps at the request of yourself prior to entering into a contract.

On occasion, processing may also be necessary for compliance with a legal obligation to which we as the controller are subject.



1.6 Automated decision making & profiling

Decisions reached by GCI are never solely based on automated decision-making results. Automated profiling is used to prevent fraud & credit risk however, all final decisions are made by GCI employees qualified to do so.

1.7 Categories of recipients

Your personal data will be treated as strictly confidential and will only be shared with the categories of recipients detailed below as applicable and for the purpose stated.

- Partners, suppliers or agents involved in delivering the products and services you've ordered – to fulfil your order;
- Credit reference agencies – to ensure financial eligibility;
- Fraud prevention agencies – to prevent fraud;
- Invoice delivery providers – to process billing records;
- Secure payment portals – for PCI compliant payment transactions;
- Alternative dispute resolution – for complaint escalation;
- External debt collection or recovery agencies – for payment disputes;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities – where required by law.

GCI may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

1.8 Non-EU transfer & safeguards for international transfers

Data may be transferred to third countries i.e. those outside of the EU and this will be undertaken in compliance with the requirements of the GDPR in order to ensure that an adequate level of protection is provided for this personal data.

Details of how to obtain a copy of the relevant safeguards can be requested by contacting dpo@gcicom.net.

If you use GCI services whilst you are outside of the EU, your data may be transferred outside the EU in order for us to provide you with those services.

1.9 Data retention period & criteria used to determine that period

GCI will only store your personal data for as long as we are required to by law. If no legal requirement is applicable, we will only store it for as long as we need it to fulfil our contractual obligations or for a twelve month period after the termination of your contract with us to facilitate you resuming your service with us should you change your mind.

Information relating to accounting will be held for a period of 6 years from when your contract ends with us.

1.10 Rights to request access to the data, object, restrict processing, rectification, erasure & portability

Unless subject to an exemption under the GDPR, you have the ability to exercise via the GCI DPO the following rights with respect to your personal data:

- The right to request a copy of your personal data which GCI holds about you;
- The right to request that GCI corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for GCI to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right where applicable to request that GCI provide you with a copy of your personal data and, where possible, to transmit that data directly to another data controller (known as the right to data portability);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right where applicable to object to the processing of personal data;
- The right to lodge a complaint with your local supervisory authority



1.11 Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new Notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

1.12 Right to lodge a complaint with a supervisory authority

To exercise all relevant rights, or for queries, please in the first instance contact GCI on the contact details provided above.

Should you have a concern about our information rights practices, you have the right to complain directly to our supervisory authority

In *Eire*, the address and contact details are as follows:

Office of the Data Protection Commissioner
Canal House
Station Road
Portarlinton,
Co. Laois, R
32 AP23
Ireland.

Phone +353 (0761) 104 800
LoCall 1890 25 22 31
Fax +353 57 868 4757
email info@dataprotection.ie

In the *UK*, the address and contact details are as follow:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Alternatively, you can email them via the following link:

<https://ico.org.uk/global/contact-us/email/>

If you are not in the UK, you should contact the equivalent supervisory authority in your country.

1.13 Updates to this Notice

We may update this Notice from time to time in response to changing legal, technical or business developments.

When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws.



You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.