



Privacy Policy

# 1. Introduction

Welcome to the Seethelight Privacy Policy.

Please note that, in this privacy policy, reference to “we”, “us”, “our” and Seethelight denotes Independent Service Provider Limited, trading as “Seethelight” which is an Inexus Group Company, Registered number 05366057, whose registered address is Ocean Park House, East Tyndall Street, Cardiff, South Wales, CF24 5GT and “you”, “your” denotes you the customer.

Independent Service Provider Limited will be responsible for all uses of your personal data.

Seethelight respects your right as our customer to privacy and takes its responsibilities regarding the security of your customer information very seriously. We have developed this policy because we want you to feel confident about the privacy and security of your personal information.

Seethelight has notified the Information Commissioner’s Office of its activities in accordance with the Data Protection Act 1998 (Registration No. Z1334015). This notification can be viewed at [www.ico.gov.uk](http://www.ico.gov.uk).

Seethelight takes all reasonable care to prevent any unauthorised access to your personal information.

## 2. About Seethelight

Seethelight is a leading-edge broadband and telephony communications provider in the UK. It is currently deploying a next generation services in various areas across the country to bring its customers advanced voice and high-speed Internet services. Seethelight’s mission is to bring these advanced services to business and residential customers alike. Please contact our sales office (please see Contacting Seethelight on our website) to find out if you are able to receive our services in your area, or alternatively check on our website at [www.seethelight.co.uk](http://www.seethelight.co.uk).

## 3. Definition of Personal Data

3.1 This privacy policy has been created to explain to you the way in which Seethelight uses your “personal data”. When we refer to “personal data” in this privacy policy, we mean personal information which identifies you as an individual, or is capable of doing so. This may include information which tells us something about you as an individual, for example your name, address or telephone number. We are committed to providing you with a professional and personalised service whilst at the same time safeguarding your privacy and protecting your personal data from unauthorised uses or disclosures.

3.2 “Sensitive personal data” is a particular category of information and is any “personal data” which concerns racial or ethnic origin, political opinion, religious beliefs or other beliefs of a similar nature, membership of a trade union, physical or mental health or conditions, sexual life, commission or alleged commission of any offence or any proceedings for any offence committed or alleged to have been committed by you, the disposal of such proceedings or the sentence of any court in such proceedings. Any sensitive personal data that you provide to us will be processed in accordance with this policy and the Data Protection Act 1998. By providing us with your sensitive personal data you are consenting to such use.

## 4. Collection of Personal Data

4.1 We may hold and use data about you in your capacity as a customer or in any other capacity, for example, when you visit our website. The types of personal data we will collect may include details of your name, address, telephone number, email address, fax number and date of birth.

4.2 In some instances, we may need your credit/debit card details to charge for the services. All financial transactions are secured by SSL encryption to offer secure communications of sensitive data to and from our website. However, no data transmission over the Internet can be guaranteed to be totally secure, and any information which you send to us is sent at your own risk.

4.3 When you (or someone using your telephone line) make a telephone call or send a fax that uses our telephone network or connect to the Internet, we keep a record of that call (including the number called) to enable Seethelight to charge for it. We also receive information from other operators about calls made over our network, where we need that information for connecting and billing purposes.

4.4 If a customer abuses the Seethelight telephone network, for example by making offensive or nuisance calls, we may keep any information relating to that abuse.

4.5 If a customer abuses the Seethelight Internet Service or any value-add services connected with it, for example by breaching any of part of our Internet Acceptable Use Policy (available on our website [www.seethelight.co.uk](http://www.seethelight.co.uk)), we may keep any information relating to that abuse.

4.6 We will hold information about your use of our services (such as the amount of time you spend on-line), which we will use to manage our network and for billing. We may also use this information for marketing products and services. If you do not want to receive such information, please let us know (see Contacting Seethelight on our website).

4.7 Seethelight may, from time to time, hold competitions or promotions. If you enter into any of our competitions or promotions, we may ask for information about you. This will be made clear at the time you enter the competitions or promotions. We will also inform you of the purposes for which the information you provide may be used.

4.8 We may ask you questions, from time to time, regarding the use you make of the services we provide, the other services you would like us to provide in the future and regarding any other information, such as lifestyle data. This information will only be used internally to enable us to improve the quality of our service and to provide additional services to you. This information will not be published on our website. We may also use your data to perform statistical analysis to help understand how people are using our services so that we can improve them.

4.9 We may receive personal information about you from other companies and organisations (for example, for marketing purposes). We will rely on these third parties to obtain your consent to our use of this information.

4.10 When you order services from Seethelight, we may make enquiries about you for credit reference purposes. These enquiries include searching your records held by Experian/Equifax or any other credit reference agency and checking any details held on you by the Interactive Media in Retail Group (IMRG) Security Alert or any other fraud prevention scheme. At all times, where your information is disclosed to us, we will protect it in accordance with this policy and keep it secure.

4.11 Seethelight will use your personal data in accordance with the Data Protection Act 1998 and in accordance with this policy. Seethelight will not disclose your personal information to third parties other than when required to provide services to you.

## 5. Direct Marketing

5.1 If you have consented at the point of data collection to Seethelight (and/or any third party) providing you with direct marketing material, you will be requested to elect the type of media via which this material shall be provided (e.g. by post, email, telephone or fax). Seethelight will only provide you with such material via your chosen media. If, at any stage, you object to Seethelight's use of your personal data for direct marketing or to the media in which such material is being sent, you may choose to unsubscribe to its receipt. If you have consented to receive third party direct marketing, you will need to unsubscribe directly with that third party.

5.2 If you would like to stop unsolicited telemarketing calls from companies (including Seethelight), please contact the Telephone Preference Service on 0845 070 0707, or do this online at [www.tpsonline.org.uk](http://www.tpsonline.org.uk) and register your telephone number(s). Direct marketing calls should stop after 28 days.

5.3 If you would like to stop unsolicited direct marketing mailings companies (including Seethelight), please contact the Mail Preference Service on 0845 7034599, or do this online at [www.mpsonline.org.uk](http://www.mpsonline.org.uk). Direct marketing mailers should stop or significantly reduce after 3 months.

5.4 If you would like to stop unsolicited fax calls from companies, please contact the Facsimile Preference Service (FPS) on 0845 070 0702, or do this online at [www.fpsonline.org.uk](http://www.fpsonline.org.uk) and register your telephone number(s). Direct marketing calls should stop after 28 days.

Remember to re-register if you change your address.

## 6. Sharing of your Personal Data

6.1 As a normal part of our business, we share with other communications companies information for connecting and charging for calls over each others' networks. We sometimes use other companies to provide services to you or to provide services to us. To enable them to do this, we may need to share your personal information with them. When we do so, these companies are required to act in accordance with the instructions we give them and they must meet the requirements of the Data Protection Act 1998 to keep the information secure.

6.2 We make our customers' telephone numbers available to directory enquiry services, unless the customers have chosen to be registered ex-directory.

6.3 We may provide information, in response to properly made requests, for the purposes of the prevention and detection of crime and the apprehension or prosecution of offenders. We may also provide information for the purpose of safeguarding national security. In either case, we do so in accordance with the provisions of the Data Protection Act 1998. We also provide information when required to do so by law, for example under a court order, or in response to properly made demands, under powers contained in legislation.

6.4 If there is a change (or prospective change) in the ownership of Seethelight or any of its assets, we may disclose personal information to the new (or prospective) owner. If we do so, we will require them to keep such information confidential.

6.5 Seethelight may disclose your personal data to carefully selected business partners and third party suppliers to whom we engage to provide services and as is necessary to provide services to you. Disclosures to third parties, other than as described in this privacy policy, will occur only with your express consent or as is required by law.

6.6 If you believe that the personal information we hold on you is incorrect, you may amend it by following the procedure set out below in "Making Changes to Your Retained Personal Data."

## 7. Retention of your Personal Data

The time period for which we keep information varies according to the purpose for which the information is used. In some cases, there are legal requirements to keep data for a minimum period. Unless there is a specific legal requirement for us to keep the information, we will retain the information for no longer than is necessary for the purposes for which the data was collected or for which it is to be further processed.

## 8. Finding out What Personal Data we Hold About You

8.1 You have certain rights under the Data Protection Act 1998. You can contact us to ask us whether we are keeping any personal data about you. If you want to obtain any specific information, please contact us and provide us with any relevant information to enable us to locate the information about you (this will speed up our reply). We may be able to provide such specific information without you having to make a formal request.

8.2 You can make a formal request if you want to obtain details of the personal information Seethelight holds about you. We may ask for a small charge for providing this information to you.

Please send your written request to the following address:

Data Protection Officer  
Seethelight  
The Lighthouse  
Ocean Way  
Cardiff  
CF24 5HF

## 9. Making Changes to Your Retained Personal Data

If you believe that the personal data held by Seethelight about you is in any way incorrect, you can contact our Data Protection Officer to notify the required changes. Please contact Seethelight using the address shown in Section 8 (Finding out What Personal Data we Hold About You), paragraph 8.2

## 10. Use of “Cookies”

In addition to the personal information you provide to us, we may also automatically collect some information about you through the use of cookies (files which are sent by us to your computer). The main reason we use cookies is to help us improve your experience of using our website. The purpose of the use of cookies is also to provide us with information regarding what you and other users do on our website so that we can make the whole experience better for everyone.

We may access cookies which are stored on your computer when you visit our website or when you open emails we send to you. We are able to do this by including web beacons (also known as clear GIFS or web bugs) in our emails. If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies.

Our cookies will have the file name: STL(...).txt.

If you want to stop cookies being stored on your computer in future, please refer to your browser manufacturer's instructions by clicking "Help" in your browser menu. Please note that, by deleting our cookies or disabling future cookies, you may not be able to access certain areas or features of our website. For more information about deleting and controlling cookies visit [www.aboutcookies.org](http://www.aboutcookies.org).

Our web beacons do not store any additional information on your computer but, by communicating with the cookies stored on your computer, we will be able to know when you have opened the emails we sent to you. If you object to our use of web beacons, we recommend that you follow the instructions for deleting existing cookies and disabling future cookies. We will still be able to know how many of our emails you have opened and we will also automatically receive your IP address (which is a unique identifier for your computer or other access device) but we will not be able to identify you as an individual.

## 11. Security of your Personal Data

We take very seriously the guarding and security of your personal information and the details of any transactions made. We take appropriate organisational and technical security measures to protect your data against unauthorised disclosure or processing. We use secure servers to store the information you give us when you register or place an order (including your credit card details and your password). Any personal data you send us online is securely encrypted. These measures ensure an appropriate level of security in relation to the risks inherent in the processing and the nature of the personal data to be protected. Your securely held personal data will only be accessible by select authorised members of Seethelight.

Please note that your billing account number is a sensitive piece of information, which can be used, with your telephone number,

to find out information about your use of the Seethelight's services. Please ensure that you keep this information in a safe place and do not share it with others. For access to information, such as itemised billing and some business account and ordering services, extra proof of identity and authorisation may be required.

## 12. Your Privacy and Third Party Websites

In the event that you access links to third party websites from the Seethelight website (for information, products or services), please be aware that your use of these websites is not covered by our privacy policy. We therefore urge you to be careful when you enter any personal information on these third party websites. Seethelight does not accept responsibility or liability for these third party websites. You are strongly advised to read any privacy policy which is displayed on a third party's website.

In the event that we allow other companies to advertise or offer their products or services on our website, please be aware that they may also allocate cookies to your computer. The use of the information generated by such cookies will be governed by their own privacy policies and not ours. However, you may refuse such cookies by following the procedure described in paragraph 10 above.

## 13. Changes to This Privacy Policy

We may change our privacy policy from time to time. New versions of the policy will be published on our website.