



MANX TELECOM TRADING LIMITED
PRIVACY POLICY

1. BACKGROUND

This Privacy Policy together with our Website Terms of Use (a copy of which can be found at www.manxtelecom.com/terms) set out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. We are committed to protecting and respecting your privacy.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the Data Protection Act 2002 (the Act), the data controller is Manx Telecom Trading Limited that has its registered office at Isle of Man Business Park, Cooil Road, Braddan, Isle of Man IM99 1HX.

Any terms not defined in this Privacy Policy shall take the meaning provided in our Website Terms of Use.

2. INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- information that you provide by filling in forms on any of Our Websites, including (but not limited to) information provided at the time of:
 - registering to use of any of Our Websites;
 - subscribing to any of our services;
 - posting material on any of Our Websites; or
 - requesting further services from any of Our Websites.
- if you enter one of our competitions or promotions or such competitions or promotion that are sponsored by a third party company;
- when you report a problem with any of Our Websites;
- if you contact us, we may keep a record of that correspondence;
- if you complete one of our surveys that we use for research purposes.
- if you carry out any transactions on any of Our Websites.
- details of your visits to any of Our Websites including, but not limited to:
 - traffic data;
 - location data;
 - weblogs; and
 - other communication data,whether this is required for our own billing purposes or otherwise and the resources that you access.
- personal information as required for certain services may include:
 - name;
 - postal address;
 - email address;
 - MT account number;
 - banking details; and/or

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- credit/debit card details.

4. IP ADDRESSES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

5. COOKIES

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Each of Our Websites uses cookies from time to time to distinguish you from other users of each of Our Websites. This helps us to provide you with a good experience when you browse each of Our Websites and also allows us to improve each of Our Websites.

For detailed information on the cookies we use and the purposes for which we use them see our cookie Policy, the current version of which is available at www.manxtelecom.com/terms

6. WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you will be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). Also it will be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

All confidential information you provide to us is transmitted using Secure Socket Layer (SSL) encryption technology and may be stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of any of Our Websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Any modern browser can be used to access our websites with SSL technology.

If you are required to send us your credit or debit card information, your card details will always be transmitted securely using HTTP over SSL (HTTPS). Some details will be encrypted and stored on our servers for the period required for processing. Where a regular or on-demand payment has been requested by you then your card details are stored at our payment provider's secure facility to be used as necessary.

Any credit and debit card details stored by us are in encrypted form and can only be viewed by employees with the appropriate level of security clearance.

In addition to the steps that we take to protect your personal data, you should take the following steps to help protect yourself against Internet fraud:

- choose a password you can remember but others will not guess, and if you do write it down, keep it somewhere safe and secure;
- when you have finished any session on any of Our Websites, make sure that you prevent your details being seen by any third parties and, if you have registered and logged in, remember to log off;
- clear any 'cache' so there is no record of any transactions left on screen; and
- close your browser so any history of the session is cleared.

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Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to any of Our Websites; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

7. USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- to ensure that content from each of Our Websites is presented in the most effective manner for you and for your computer;
- to send you messages about your account or to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- to carry out our obligations arising from any contracts entered into between you and us;
- to allow you to participate in interactive features of our service, when you choose to do so; and
- to notify you about changes to our service.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post or telephone.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.

If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, then:

- please tick the relevant box situated on the form on which we collect your data (the order form); or
- by contacting our Customer Services department by telephone (+44 1624 624624) or by email customer@manxtelecom.com.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in IM1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

8. DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 220 of the Isle of Man Companies Act 2006 (as amended).

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;

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- if we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use or our Terms and Conditions of Supply (a copy of which can be found at www.manxtelecom.com/terms) and other agreements; or to protect the rights, property, or safety of Manx Telecom Trading Limited, our customers, our suppliers or other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

9. YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data.

You can also exercise the right at any time by contacting us at Manx Telecom Trading Limited, Isle of Man Business Park, Cooil Road, Braddan, Isle of Man IM99 1HX or by email to [**products@manxtelecom.com**](mailto:products@manxtelecom.com).

Each of Our Websites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates or other third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

10. ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

11. CHANGES TO OUR PRIVACY POLICY

We may revise this Privacy Policy.

You are expected to review this Privacy Policy from time to time in order to consider any changes that we make hereto, as such changes will be binding on you once you access any of Our Websites.

If appropriate, we may notify you by email of certain changes to this Privacy Policy that we may make from time to time.

12. CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to Manx Telecom Trading Limited, Isle of Man Business Park, Cooil Road, Braddan, Isle of Man IM99 1HX or by email to [**products@manxtelecom.com**](mailto:products@manxtelecom.com).

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