

Privacy Policy

This Privacy Policy sets out how Purefibre Internet Ltd. ("Purefibre") collects, uses, stores and processes any information that you provide when you use Purefibre's services or its website.

For the purposes of the General Data Protection Regulation (the "Regulation"), which comes into effect on 25 May 2018, the Data Controller is Purefibre Internet Ltd. of The Courtyard, Park Road, Tring Herts. HP23 6DB (contact details below).

Purefibre is committed to ensuring that your privacy is protected and only used as permitted under privacy laws. Should you provide personal information by which you can be identified when using Purefibre's services or when using our website, your personal information will only be used in accordance with this Privacy Policy.

Data Collection

When you order our services, we will collect your name, address, contact numbers and email address. The Direct Debit Mandate for the payment of services also identifies your bank sort code and account number. We are also required by law under certain circumstances to monitor, collect and retain data and information regarding your use of Internet and broadband communications services that you obtain through us. 3rd party service providers such as telephone, television, mobile phone, wi-fi or other communications services, which provide a service to you using Purefibre's broadband, may also separately collect, access and retain data about you and your use of services across the Internet.

We use your details and information to provide a contractual service to you and to provide you with support and maintenance. We also may use this information to tell you about our services, about associated 3rd party services that may affect you, as well as any changes to our service. Unless you tell us not to, we may, from time to time, contact you to tell you about products or services we think you might be interested in. We might do this through the post, online, via email, or on the phone.

We may collect and process the following data about you:

Information you give us

You may give us information about you by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you subscribe to our service, search for a product, place an order, participate in discussion boards or other social media functions, and when you report a problem or contact Purefibre for any reason. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description, work details, technical information regarding your use

of our and associated 3rd party services, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, operating system and platform as well as internet activity.

Information we receive from other sources

We may receive information about you if you use 3rd party services using our products such as telephone services. We also work with third parties (including, for example, business partners, sub-contractors, payment and delivery services, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

We may use information held about you in the following ways:

to carry out our obligations arising from any contract(s) entered into between you and us and to provide you with the information, products and services that you request from us;

- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about; to notify you about changes to our service;
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to correspond with you regarding Purefibre products and services;
- to comply with any legal obligations we have as a broadband and internet service provider;
- to help us improve the services we provide.

Information we receive from other sources.

We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

Purefibre may provide links to third parties, or may provide access to 3rd party services across our networks. Purefibre has no responsibility or liability for the information practices of those 3rd parties and we encourage you to review each 3rd party's privacy policy before disclosing any personal details to them.

Information obtained by automated means

We keep information about how you are using your broadband to help us understand and manage traffic flows on our network. This includes IP addresses and other traffic data including websites you've visited. We may also use this information to provide you

with certain services you ask us for – like parental controls on web access and to provide support and maintenance for you. We also may have regulatory obligations to monitor and store information about your broadband and Internet access use.

Our monitoring systems are designed to optimise your internet experience and assist us in trouble-shooting issues that you may encounter. These systems may receive nicknames you have given to your network access points and devices, person profiles, profile nicknames, and profile photos to allow us to provide you with a user-friendly view of your network access points and connected client devices.

To deliver the best Wi-Fi experience, quality of service and security, we automatically collect some information when you use our network such as:

Information about your connected devices

This information includes the type of device you use, operating system version, along with attributes gleaned from its network metadata including (but not limited to) its dynamic host configuration protocol (“DHCP”) fingerprint, hypertext transfer protocol (“HTTP”) user agent information, UPnP and mDNS discovery information, a sampling of domain name system (“DNS”) requests, device hostname, the nickname given to the device and the unique addresses of the device.

Network topology map

This information depicts the connections between client devices you use and the network routers and access points serving Wi-Fi.

Network and connectivity status

This information indicates the networking addresses of the devices and system used to communicate with our monitoring systems and the Internet along with the operating statistics of the Wi-Fi and Internet connections.

Data consumption from your devices, the Internet and network system interfaces

This information includes the current and historical data transfer speeds and the amount of data consumed.

Services statistics and logs

We collect certain information to help us create statistics and optimise our Services. Such information includes your Internet protocol (“IP”) address, speeds and outages, Wi-Fi operating environment, mobility of devices within the home, and usage stats (e.g., number of features used or screen views) for any apps that we provide you with to configure and monitor your home network. We also collect log information such as messages from the network devices, device inventory data, and software and hardware versions.

Safety controls and Internet security features

Safety controls and Internet security features require the monitoring of device network traffic like source and destination traffic headers, IP addresses, ports, size and counts of transferred bytes and packets, applications consumed and DNS requests. If you are using the WiFi of someone while the safety controls and security features are On, note that the user of any monitoring app that we provide with our network devices may link the activity on your device to you, and see in the app information about your use of the WiFi, such as whether your device is currently connected to the WiFi, how long it has been connected, any blocked domain name that you tried to access, and the time when you tried to access it.

Motion at home

We collect information regarding disruptions in WiFi waves in the periphery of some of our network access points and devices connected to the home network to provide you with visuals of the live motion and motion history in your home.

Digital wellbeing related features

Digital wellbeing requires collection of device network traffic metadata about time spent online using various Internet applications.

Crash reports

We collect crash reports for both the network device software and any mobile monitoring app that we provide you with. These reports can include information such as the type of crash, the software version you are running and the operating system version of the device running the monitoring app.

Disclosure of your information

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with you.
- 3rd party web or internet server and storage companies which operate in the UK or overseas. Purefibre takes all necessary precautions and safeguards to ensure that any transfer and processing of your data overseas is managed in compliance with all European Union standards.
- Analytics and search engine providers that assist us in the improvement and optimisation of our website.

We may disclose your personal information to third parties:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Purefibre, our customers, or others. This

includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

- If Purefibre or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets.

Where we store your personal data

The data that we collect from you is primarily stored and managed in the UK, but may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). By submitting your personal data, you agree to this transfer, storing or processing. We take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

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 our site; 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.

Retention of your information

The law says that in certain circumstances we may have to keep certain information about how you use our internet services for 12 months. This information may be used by law enforcement agencies to prevent and detect crime and to protect national security, but we only disclose information to them when we are legally required to. If we think there has been crime, fraud, misuse of, or damage to, our network, we will use this information for our internal investigations and any subsequent prosecution(s). We will also provide it in reply to other lawful requests for information such as about illegal online file sharing.

Your rights

Unless subject to an exemption under the Regulation, you have the following rights with respect to your personal data: –

- The right to request a copy of your personal data which we hold about you.
- The right to request that we correct 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 us to retain such data.
- The right to withdraw your consent to the processing at any time.
- The right to request that we provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability) where applicable.
- 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 to lodge a complaint with the Information Commissioners Office (contact details below).

You also have the right to ask us not to process your personal data for marketing purposes. We will 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 the right at any time by contacting us at help@purefibre.net.

Our website may, from time to time, contain links to and from the websites of partner networks, advertisers and affiliates. 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.

Access to information

The Regulation gives you the right to access information we hold about you. Your right of access can be exercised in accordance with the Regulation.

Changes to our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

Purefibre Internet Ltd., The Courtyard, Park Road, Tring, Herts. HP23 6DB

www.purefibre.london help@purefibre.net

You can contact the **Information Commissioners Office:**

by telephone on 0303 123 1113

via email at:

<https://ico.org.uk/global/contactus/email/>

or by post:

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.