Millbeck Communications Limited

Privacy Policy

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Millbeck.

Contents

1. Who We Are
2. Scope of This Policy
3. The Information We Collect
4. How We Use Your Information
5. Marketing
6. Who We Share Your Information With
7. International Transfers
8. How Long We Keep Your Information
9. How We Protect Your Information
10. Cookies
11. Your Rights
12. Complaints
13. Links to Other Websites
14. Changes to This Policy
15. Contact Us

1. Who We Are

Millbeck Communications Limited ("Millbeck Communications", "we", "us") is a company registered in England and Wales with company number 04501248. Our registered office is 6 Arena Park, Tarn Lane, Leeds, LS17 9BF, United Kingdom.

We supply IoT and machine-to-machine (M2M) connectivity, mobile voice and data services, mobile broadband, value-added services, cellular routers and other hardware to business customers.

This policy explains how we collect, use and protect personal information. We work only with business customers, so the personal information we handle is mainly about the people who work for or represent those businesses.

2. Scope of This Policy

This policy applies when you visit millbeck.co.uk, contact us, apply for or buy our products and services, or use our services as a customer or customer contact. For this information, Millbeck Communications is the controller, which means we decide how and why it is used and we are responsible for looking after it.

When we provide connectivity services, our business customers may pass us, or send over our services, personal information about their own users, devices and end customers. For that information we act as a processor on our customer's behalf, under our contract with them, and our customer's own privacy notice explains how it is used.

3. The Information We Collect

We collect the following types of personal information:

- **Contact details:** your name, job title, company name, email address, phone number, and billing and delivery addresses.
- **Account details:** account numbers, login details for our online platforms, and account preferences.
- **Order and contract details:** the products and services you order, contracts, invoices, deliveries, returns and warranty claims.
- **Payment and credit details:** payment and Direct Debit details, and credit checks on your business where it applies for services or a credit account.
- **Service and usage details:** for mobile and connectivity services, SIM and mobile numbers, call and message records, data usage, connection times, network location information and device identifiers.
- **Communications:** emails, phone calls, support requests, complaints and other messages you send us, and any survey responses you choose to give.
- **Website usage:** your IP address, browser type, device information, the pages you visit and how you arrived at our website, collected through cookies and similar technologies (see section 10).
- **Marketing preferences:** whether you have chosen to receive, or opted out of, marketing emails from us.

Most of this information comes directly from you or from your employer. We may also receive information from the mobile networks and platforms we use to provide our services, credit reference and fraud prevention agencies, and publicly available sources such as Companies House.

4. How We Use Your Information

Data protection law requires us to have a lawful basis for each way we use personal information. The table below sets out what we do and why.

What we use it for	Lawful basis
Checking eligibility, processing orders, providing and supporting our products and services, and billing	Performing a contract with you, or our legitimate interests in supplying your business where you act on its behalf
Handling returns, faults, warranty claims and support requests	Performing a contract, or our legitimate interests in supporting our customers
Keeping financial, tax and customs records, and meeting our regulatory obligations as a communications provider	Complying with our legal obligations
Connecting emergency calls and passing location information to the emergency services	Complying with our legal obligations
Preventing and detecting fraud and crime, including fraudulent use of our services, and keeping our services and systems secure	Our legitimate interests in protecting our business, our customers and the networks we use
Checking credit for new services and credit accounts	Our legitimate interests in managing credit risk
Sending service information and updates about the products and services your business uses	Performing a contract, or our legitimate interests in keeping customers informed
Responding to enquiries and complaints	Our legitimate interests in running our business and serving our customers
Surveys, market research and improving our products and services	Our legitimate interests in understanding and improving what we offer
Running, maintaining and improving our website	Our legitimate interests in operating an effective website
Advertising cookies	Your consent, which you can change at any time through our cookie settings
Sending marketing emails about our products and services	Our legitimate interests in promoting our products to business customers, or your consent where the law requires it

5. Marketing

We may send business contacts emails about products, services and offers that are relevant to their business. Where the law requires your consent, for example if you are a sole trader or in some partnerships, we will only send marketing emails if you have agreed or, where you have bought from us, about similar products and services. Every marketing email includes a link to unsubscribe, and you can also opt out at any time by contacting us. We do not sell your personal information.

6. Who We Share Your Information With

We only share personal information where we need to, and only with:

- **Mobile network operators and connectivity platforms** that we use to provide our services, including for SIM activation, service management, billing and fault resolution.

- **Service providers** who help us run our business, including hosting and IT providers, billing, CRM and email providers, payment providers, couriers, and our accountants and professional advisers. They may only use your information to provide their services to us.
- **Manufacturers and distributors** where this is needed to handle a warranty claim or product return.
- **Credit reference and fraud prevention agencies** when your business applies for services or a credit account. They may keep a record of the search.
- **Other communications providers** where needed to move a mobile number to or from us.
- **The emergency services** when an emergency call is made using our mobile voice services.
- **Ofcom, the Communications Ombudsman, and customs and tax authorities** where needed to meet our legal and regulatory obligations or to resolve a complaint.
- **Police, courts or other authorities** where the law requires it or where it is needed to prevent fraud or crime.
- **A buyer or successor** if all or part of our business is sold or reorganised.

We may share aggregated statistics about how our website and services are used, but these do not identify any individual.

7. International Transfers

Some of our service providers may store or process personal information outside the UK. Where they do, we make sure your information is protected, for example by using countries the UK government recognises as providing adequate protection, or by using contracts approved for international data transfers.

8. How Long We Keep Your Information

- **Contracts, orders, invoices and financial records, including call and usage records used for billing:** up to 7 years after the end of the financial year they relate to, or after the contract ends, to meet tax, accounting and legal requirements.
- **Customer account details:** while your account is open, and for up to 7 years after our last transaction with you or the end of your contract.
- **Enquiries and support requests that do not lead to an order:** for as long as needed to deal with them.
- **Marketing preferences:** until you opt out. We keep a record of your opt-out so that we do not contact you again.
- **Cookies:** for the periods set out in our cookie settings.

We may keep information for longer where the law requires it or where it is needed to deal with a dispute or legal claim. When we no longer need personal information, we delete it or anonymise it so that you can no longer be identified.

9. How We Protect Your Information

We use appropriate technical and organisational measures to protect personal information, including encryption where appropriate, access controls so that only authorised staff can see customer information, security controls on our IT systems, security requirements for our service providers, and staff training on data protection and security.

We will never ask for your account passwords or PINs in an unsolicited phone call or email. Please keep any passwords and PINs we give you secure and do not share them with anyone you have not authorised to use your account.

10. Cookies

Cookies are small files placed on your device when you visit a website. Our website uses the following types of cookies:

- **Necessary cookies:** needed for the website to work, such as remembering your cookie choices. These do not need your consent.
- **Analytics cookies:** used only to understand how visitors use our website so that we can improve it. We do not use them for advertising. We use these cookies unless you switch them off, which you can do at any time in our cookie settings.
- **Preference cookies:** remember choices you make, such as display settings. We use these cookies unless you switch them off in our cookie settings.
- **Advertising cookies:** used to show relevant adverts and measure how well they work, including tracking across other websites. We only use these if you agree, and you can withdraw your agreement at any time in our cookie settings.

You can also block or delete cookies in your browser settings, although parts of the website may not work without necessary cookies.

11. Your Rights

You have the right to:

- ask for a copy of the personal information we hold about you;
- ask us to correct information that is inaccurate or incomplete;
- ask us to delete your information;
- ask us to restrict how we use your information;
- object to us using your information on the basis of our legitimate interests, and object at any time to marketing;
- ask us to transfer information you have given us to another organisation; and
- withdraw your consent at any time, where we rely on consent.

Some of these rights only apply in certain circumstances. To make a request, contact us using the details in section 15. We will respond within one month, or tell you if we need longer and why. If your request is unclear, we may ask you for more detail, and the time limit will restart once we receive it.

12. Complaints

If you are unhappy with how we have used your personal information, please contact us first using the details in section 15 so that we can try to put things right. We will acknowledge your complaint within 30 days, look into it without undue delay, and tell you the outcome.

You also have the right to complain to the UK data protection regulator, the Information Commissioner's Office (ICO). Its website is ico.org.uk and its helpline is 0303 123 1113.

13. Links to Other Websites

Our website may link to other websites, such as manufacturers' and network operators' sites. We are not responsible for how those websites handle personal information, so please read their privacy policies.

14. Changes to This Policy

We may update this policy from time to time. The latest version will always be published on our website, with the date it was last updated. If we make a significant change, we will tell our customers.

15. Contact Us

Millbeck Communications Limited

Email: info@millbeck.co.uk

Telephone: 0113 548 0770

Post: Data Protection, Millbeck Communications Limited, 6 Arena Park, Tarn Lane, Leeds, LS17 9BF