

## **Privacy Policy - What's Changed**

**29 January 2021**

Our Privacy Policy has been updated mainly to accommodate how we might –

- share certain customer-related contact details with the providers of services our network enables connectivity to, being the data centre operators, cloud service providers and SD-WAN providers we've partnered with (our 'Business Partners'); and
- conduct customer surveys, produce aggregated anonymous survey results, and perhaps share such anonymous results with some of our Business Partners.

We've also clarified the distinction between customer data and prospective customer data and made other improvements to grammar for clarity, the more substantive changes being as follows:

<b>Clause reference</b>	<b>What's changed</b>
Part 1 generally	Part 1 has always dealt with the data of customers and prospective customers, but we've now split Part 1 into two sections to deal with each of these separately for better clarity, defining what we mean by 'customer' and 'prospective customer' at the start of each such section
Part 1.1 – Customers	Customer-related processing details remain the same, save for inserting specific mention of possible participation in customer surveys and possible sharing of contact details with our Business Partners (subject to privacy and marketing laws)
Part 1.2 – Prospective Customers	Prospective customer-related processing details effectively remain the same, save that we've now included mention of our Business Partners as being a possible source of contact details and the fact that contact details are retained for up to 5 years after the last communication.
Part 3 – Visitors to our Website	'Submitted Data' and 'Technical Data' now make clear reference to live web chat and our inference of generalised location (based on IP address) respectively
Part 5 – General – How else we may share personal information	We've qualified the 'Other' section with reference to the data we may share with our Business Partners (as explained in Part 1)
Part 5 – General – Where personal information is stored & processed	The substance here has not changed, but as the EU-US Privacy Shield was invalidated last year, we have removed express reference thereto
Part 5 – General – Anonymous data	We've accommodated the fact that we might permanently anonymise data as an alternative to deletion (where deletion is not reasonably possible) and as part of producing aggregated anonymous survey result reports (which, if customer-related, might be shared with our Business Partners)