



**BROADBAND
PRIVACY POLICY**

Imagine Privacy Policy

At imagine we recognise the importance of your privacy and are committed to protecting it and minimising the information we collect about you, limiting what we use it for and keeping it for no longer than required.

With this in mind, we've developed this policy so you can clearly understand what information we collect about you and how we use it, share it and your rights to that data.

We take the protection of your data seriously and apply appropriate security measures to keep your data safe and secure and that we handle and process it in accordance with the current Data Protection Legislation and European General Data Protection Regulations.

Ways we collect your data:

We collect information in a few different ways

When you give it to us or give us permission to obtain it

When you enquire about our service through our website, call-centre or speaking to us directly you give us certain information voluntarily. This includes your name, email address, phone number, Eircode and any other information you give us. When you sign up for our service we collect customer information such as name, address, Eircode, email address, phone number(s), usernames and passwords, birthdates, payment information, details of the product and service you bought, your contract type and your marketing contact preferences.

We also get technical information when you use our service

When we provide you with your service and connect you to our network we associate technical information to your account such as the IP address, Mac address and IMEI/SIM Number and location data of the equipment we provided you which uniquely identifies you.

Whenever you use our service, certain information gets created and logged automatically such as location data, traffic data, call traffic data and other diagnostic and usage data. We use this data to let you access our network and use the service, calculate billing, traffic management, performance management, fraud investigation, network troubleshooting and to meet legal or regulatory obligations.

Here are some of the types of information we collect:

- Location data which records your IP address, Mac address and IMEI/SIM number and unique identifiers to establish a connection between our network and your device to enable you to make or receive calls and access the internet.
- Call traffic data which records the calls you make including the date, time, duration of your phone calls and the number to or from which the calls were made.
- Diagnostic & Usage Data which records technical statistics about your connection, signal strength, coverage, upload and download speed and the amount of data you use.
- IP Traffic data which is limited to your IP address, the date and time of your internet access and the duration of your session. We don't have a history of your web-browsing or emails you send

as this is limited for a short real-time period to enable the connection to be made. We don't keep records of the websites you visit, what content you look at online or the content of emails you send.

- Device data is limited to the type of device you're using and its IP address.

Devices, applications and websites you use have their own privacy policies and settings for you to manage how information is collected. Due to the nature of the internet, any communications over it can pose a security risk. You should take appropriate measures to ensure the devices you use and any communications you send, have the proper level of security and encryption. Your device and communication security and encryption are your responsibility.

Information we collect on our websites

When using our websites or applications, we may collect certain information about your computer, including where available your IP address, operating system and browser type, to gather statistical information on how you browse our websites, analyse trends, administer the site, and gather broad demographic information for aggregate use.

We use Google Analytics to analyse use of our websites and emails we send to you.

To do this Imagine and Google Analytics use Cookies and Web Beacons.

Cookies are small text files, containing a unique identification number, that are stored on your devices when you visit a website. They allow us and Google Analytics to remember you and how you've used the site. Our cookies do not hold or track your personal information or provide us with any way to contact you, and do not extract any information off your computer.

Web beacons are small image files that may be placed on web pages and within web-based emails that we send. They accurately count the number of unique users who have visited a specific page on the site and the number of times those pages are displayed. We may also use web beacons to let us know how many people opened a web-based email. They are also used to facilitate the transfer of data from our website to the Google Analytics website.

Any information is only collected in aggregate form and will not be linked to your personally identifiable information. We use the information to gather trends and analysis to develop, improve and personalise our website.

Can I enable or disable cookies?

Cookies will issue when you log on to our sites. You can choose to refuse cookies, through your web browser settings. If you do, you may still use our sites, but you may be limited from accessing certain areas or services. Some of our business partners may also use cookies on our site. You can also easily delete or clear cookies on your browser at any time. You can find out more about cookies at www.allaboutcookies.org which shows you how to see what cookies have been set on your browser and how you can manage them.

We also record information when you interact with us about your service such as

- when you communicate with us through letters, emails, chat services, calls, and social media.
- when you set-up your My Imagine account with your contact and email information and create your unique password.
- when you provide information to us through competitions or market research.
- when we receive information from third parties such as address verification services or

publicly available sources where you have given them permission to share it with us.

What we do with the information we collect:

The main purpose we collect and use your information is to provide you with our product and services in accordance with our contract with you and manage your relationship with us. We also use it for legitimate business reasons or to comply with a legal or regulatory obligation.

We use the information we collect to

- provide the products and services you request.
- to manage our relationship with you as our customer and administer your account for service delivery, provisioning, customer services enquires, technical support, billing, payment processing and to manage collections.
- to record instructions you give us and keep you updated on any changes to your service.
- to record our communications with you including emails and phone conversations, to administer your account and for verification, training and quality assurance.
- to route and manage traffic and usage across our network.
- to ensure our network is secure and detect and prevent fraud or carry out network troubleshooting.
- to meet our legal or regulatory obligations.
- to protect or enforce our rights or those of a third party.
- to protect someone's vital interests.
- if you have requested us to include your name, address and phone number in the National Directory Database, or if you ask us to remove it as you have opted out.
- to improve our product and services and offer new features.
- to conduct analyses of the performance of our services, network or customer services through anonymised or aggregated information which doesn't identify you.

In addition to the specific circumstances above, we'll only use your information with your consent

- to send you information about our products, services and promotions that might interest you.
Each time we send you marketing information we give you the option to unsubscribe.
- or when you accept the use of cookies on our sites or applications.

How and when we share information:

We share your information with trusted third parties for a number of reasons, including

- with other companies within Imagine Group.
- for the performance and delivery of our products and services with companies who work on our behalf and based on our instructions. For example engineering services, billing, payment processing, cloud services, equipment vendors. In which case we will require those parties to ensure that information is kept confidentially, securely and the use is limited to the purpose for which it was provided.
- to detect, prevent or otherwise address fraud, security or technical issues.
- to carry out credit checks or debt collection processes where legally applicable.
- if you fail to meet your contractual obligations with us.
- to protect or enforce our rights or those of a third party.
- to deal with complaints, queries and protect our legal rights.

- if required to comply with a law, regulation or legal request.
- to protect someone's vital interests.
- if there was a merger or change of ownership of Imagine in which case the new owner of the business would assume the rights and obligations regarding your information.
- if a third party who is processing your data on our behalf is required to disclose it by law.
- if we need to transfer your data outside the EEA when we require a third party to work on our behalf for the performance and delivery of a product or service, we require any such service providers to process your information in a secure manner and in accordance with Irish and EU law on data protection.

How long we keep your information:

We keep your information only so long as we need it to provide services to you and for the purposes described in this policy. When we no longer need to use your information and there is no need for us to keep it to comply with our legal or regulatory obligations we'll either remove it from our systems or anonymise it so that we can't identify you.

How we secure your information:

At Imagine securing your data is important to us, which is why we take appropriate security measures, protocols and processes to secure and protect the confidentiality, integrity and availability of your information. We always aim to protect your personal information against unauthorised access, use or disclosure, using security technologies, procedures and limited access control.

Rights you have about your information:

You have rights in relation to the personal information that we hold about you:

- the right to know what's been collected and how it's being processed.
- the right to access the information we hold about you, known as a Subject Access Request.
- the right to have inaccurate or incomplete information corrected.
- the right to restrict the processing for example if you want us to establish its accuracy or the reason for processing it.
- the right to object to processing your information.
- the right to withdraw your consent for direct marketing purposes.
- the right to have information erased when we no longer have a legitimate reason to keep it.
- the right to have your information transferred to you or another organisation of your choice in electronic form.
- the right to object to decisions being made solely by automated means.
- the right to make a complaint to the Data Protection Commissioner about your information.

As we use your information to provide you with your services and for the performance of our contract with you, if you object to processing information or make requests for restriction/erasure these may affect our ability to provide you with the service requested.

You can exercise any of your rights by contacting our Data Protection Officer at the details below.

Your Contact Preferences:

You can manage your contact preferences and decide how you would like us to keep you updated about our products, services and exclusive promotions via post, telephone, text or email at anytime via your My Imagine online customer portal.

We don't share your information with third parties for marketing purposes – we only send you information that's relevant to our services. If at any time you no longer want to hear from us simply update your contact preferences on your My Imagine customer portal or just click unsubscribe at the bottom of any email or text message we send you.

To provide you with your service and manage your account with us we will always send you communications about your Account, Billing or important Service updates.

How we make changes to this policy:

We may update this policy from time to time. When we do, we will post the current version on our website and, where appropriate, notify you using your contact email. We encourage you to periodically review this policy so that you will be aware of how we use your information.

How can you contact us about this policy?

If you have any questions about this Privacy Policy or you wish to request access to your information that we hold then you can contact our Data Protection Officer at dataprotection@imagine.ie or write to us at Imagine Networks Services Limited, Data Protection, Sandyford Business Centre, Blackthorn Road, Dublin 18.

This Privacy Policy was last updated May 2018.