Privacy policy

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data. We will also tell you about your privacy rights and how the data protection law that protects you.

This privacy policy covers the specific areas set out below.

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1. The Purpose of this document

This privacy notice aims to provide information on how we collect and process our customers' personal data, as well as their customers information in turn, that we may have access to in out platforms.

Please read this privacy notice together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal data to be fully aware of how and why we are using this data. This privacy notice supplements the other notices and is not intended to override them.

Firstcom Europe is the data controller and responsible for your personal data (collectively referred to as the "Company", "we", "us" or "our" in this privacy notice).

2. The personal data we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. More about personal data is available from the Information Commissioners Office.

Information may be collected, used, stored and transferred for different kinds of personal data about customers which we have grouped together as follows:

- **Identity Data** includes first name, last name, username, marital status, title, date of birth, gender.
- **Contact Data** includes billing address, delivery address, email address, telephone numbers.

Firstcom Europe may also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with personal data so that it can directly or indirectly identify a person, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions,trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. If you fail to provide personal data

Where Firstcom needs to collect personal data by law, or under the terms of a contract and a customer fails to provide that data when requested, we may not be able to perform the contract we either have with you or are trying to enter into with you such as to provide you with goods or services.

In this case, the contract may have to be cancelled and Firstcom will notify you if this is the case at the time.

4. How we collect personal data

Firstcom uses different methods to collect data from and about customers, including:

- **Directly.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Apply for our products or services;
  - Create an account with the Company
  - Subscribe to our services or publications;
  - Request marketing to be sent to you.

5. How we use your personal data

We will only use your personal data where the law allows us to. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using it. Please contact us on DPO@firstcomeurope.co.uk if you need details about the specific legal ground, we are relying on to process your personal data.

Most commonly, we will use your personal data in the following circumstances:

- **Performance of contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

- **Legitimate interest** this means that it is in the interest of conducting and managing our business to enable us to give you the best services/products and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights, before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting DPO@firstcomeurope.co.uk

- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. Youhave the right to withdraw consent to marketing at any time by contacting us on

DPO@firstcomeurope.co.uk

- **Promotional offers from us**

  We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what products and services we think you may want or need, or what may be of interest to you.

  You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving marketing material.

- **Third-party marketing**
  We will get your express opt-in consent before we share your personal data with any company outside the Company for marketing purposes.

- **Opting out**
  You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out on any marketing message sent to you.

  Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us because of a product/service purchase, warranty registration, product or service experience or other transactions.

- **Change of purpose**
  We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact DPO@firstcomeurope.co.uk.

  If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

  Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Sharing of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in point 4 above.

- Internal Third Parties

- External Third Parties Services

  a. Professional advisers including lawyers, bankers, auditors, and insurers who are based in the EEA provide consultancy, banking, legal, insurance and accounting services.

b. HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom, who require reporting of processing activities incertain circumstances.

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way asset out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Passwords are issued only to those employees that have a specific need to access a particular system. A record is kept of each password issued on hosted protected servers. Upon employees leaving the company these passwords are revoked.

We have put in place procedures to deal with any suspected personal data breach and will notify youand any applicable regulator of a breach where we are legally required to do so.

9. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure ofyour personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available, please contact DPO@firstcomeurope.co.uk for more information.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

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

- The right to request a copy of the 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 ofdate
- The right to request that 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, where consent was the lawful basis for processing your data
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means)
- 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 object to our processing of your personal data, for our non-service delivery or legal purposes

If you wish to exercise any of the rights set out above, please contact DPO@firstcomeurope.co.uk

- **No fee required – for reasonable requests**
  You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.
- **What we may need from you**
  We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

- **Time limit to respond**
  We try to respond to all legitimate requests within one month. Occasionally it may take us

longer than a month if your request is particularly complex or you have made several requests. In this case we will notify you and keep you updated.

11. Changes to this notice and your duty to inform us of changes

This version was last updated on the date indicated at the beginning of this document and historic versions can be obtained by contacting us on DPO@firstcomeurope.co.uk

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

12. Queries, Requests or Concerns

To exercise all relevant rights, queries, or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Protection Officer DPO@firstcomeurope.co.uk

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioners Office on 03031231113 or via email https://ico.org.uk/global/contact-us/email/