

PrePayPower Limited Privacy Statement for Domestic Broadband Customers

1. Acceptance of the Privacy Statement

We take your privacy very seriously and we ask that you read this privacy statement carefully, along with our “terms and conditions” as it contains important information. This privacy statement and our terms and conditions are located on our website www.prepaypower.ie/broadband.

If you need to give personal information about someone else in your household this privacy statement will also apply to them and we ask that you share this with them.

Please note that we may not be able to provide you with services if you do not provide your personal data.

2. Changes to the Privacy Statement

We may change this privacy statement from time to time. You should check this statement occasionally to ensure you are aware of the most recent version that will apply each time you access this website.

3. What personal data do we collect directly from you?

We collect personal data about you such as:

Contact details: meaning information that allows us to directly identify or contact you. This information includes name, address, telephone number, e-mail address, date of birth, type of electricity meter installed at the property and the supply number by which your electricity number is identified (MPRN).

Competition Information: meaning information you provide to us when you enter competitions.

Customer Care Information: meaning information when you contact us inquiring about our products and services and also information such as your support requests and the details required to resolve them. The time and duration of the customer care call, the communication channel used to contact us (including social media) and the solution applied. We may also monitor and record our communications with you, including e-mails and phone conversations, for training purposes and quality assurance.

Financial information: meaning credit and debit card information you provide when payment is made online or over the phone

Website Data and cookies: such as when you use our website, we collect the time and duration of the session, pages visited, campaign attributes, transaction details and technical details (IP/MAC address, operating system and browser type). For more information on how we use cookies on our website, please read our cookies policy. A copy of this can be found at <https://www.prepaypower.ie/termsandconditions>. We do not keep records of what content you look at online. The only exception to this is when we are required to do so by law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities.

4. What do we use your personal data for?

We process your personal data for the following reasons, which we have listed based on the appropriate legal basis for this processing:

- For the preparation or performance of a contract with you.
- Based on our legitimate interest.
- Compliance with a mandatory legal obligation
- Where you have provided your consent. You can withdraw your consent at any time (see section 7)

Performance of a contract:

- Provide you with the service
- Record details about the broadband service you have ordered
- To make sure our broadband service is working as it should be
- Provide you with updates on the delivery, connection or installation of the service
- Send you service information messages (e.g. when we need to tell you about any change that might affect your service such as planned works)
- To respond to your queries
- To send you statements

Legitimate interest:

- Identify and let you know about, products and services that interest you
- Create aggregated and anonymised information for further use
- Research and analytics to monitor how customer use our network
- Detect and prevent fraud and crime
- Secure and protect our network
- To tailor our services to your needs
- To remember certain choices, you have made (so you do not have to re-enter them)
- Show you more relevant online advertising
- Help you understand when you may need to top-up, or perform some other action to ensure continued broadband service
- Payment information e.g. online top-up payments
- Run surveys and market research about our products
- To collect debt

Compliance with a legal obligation:

- As requested by law enforcement agencies or competent authorities

Consent

- As a new customer when you sign up, we will ask you if you would like to receive marketing information from us by way of email, SMS, phone, post or other specified means of contacting you.
- Competitions

5. Who we share your personal data with

We may disclose your personal data to:

- Other companies within our group:
- Our agents, business partners, service providers, suppliers and sub- contractors. We may need to disclose your details to organisations who provide services to use. For example: third party wholesale service providers (like Open Eir, Siro, Enet, EutelSat), outsourced installation technicians, equipment dispatchers, marketing and advertising and debt collection agencies. If our suppliers are in other countries which have different laws about data protection, we impose contractual and technical measures to ensure your data is secure.
- Law enforcement agencies in connection with any investigation to help prevent unlawful activity

6. Transfers of your personal data out of the EEA

We may need to transfer your personal data outside the European Economic Area. If we need to send your information to a country that is not in the EEA, we will make sure that your information is properly protected. We will always ensure that there is a proper legal agreement that covers the data transfer. If the country is not considered to have laws that are equivalent to EU Data protection standards, then we will ask the third party to enter into a legal agreement that reflects those standards.

7. Keeping your personal data secure

The security of your personal data is important to us. We restrict access to personal data to employees, contractors and agents who need to know such personal data to operate, develop or improve the services we provide. We will use technical and organisational measures to safeguard your personal data, for example:

- We store your personal data on secure servers
- Payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).

While we use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. We cannot accept responsibility for any unauthorised access or loss of personal data that is beyond our control.

8. How long do we keep your personal data?

We will keep:

- A summary of your bill (broadband usage) for six years from the date of the bill
- Your contact details on file while you are one of our customers and for six years after and
- Details relating to any dispute for six years after it was closed.

We will keep some personal information for a reasonable period after your contract with us has finished in case you decide to use our services again. If you have not opted out of receiving marketing communications, we may contact you about PrePayPower services during this time.

9. Right to access personal data relating to you

You can request a copy of the information that we hold about you (you must be the account holder to ask for this information). Requests for your personal data must be made to us in writing (see “How to contact us” section). We will always try to accommodate your request, but we can refuse if we believe doing so would have a negative effect on others or the law prevents us. And even though we must complete your request free of charge, we are allowed to reject requests if:

- they're repetitive;
- you don't have the right to ask for the information; or
- the requests made are excessive.

If that's the case, we'll explain why we believe we don't have to fulfil the request.

It will normally take up to month to respond to your request, but it could take longer (up to a further two months) if it is a complicated request or you send a lot of requests at once.

10. Right to restrict processing of your personal data

You can request restriction of processing of your personal data for following reasons if:

- You do not think that your data is accurate
- You believe that we shouldn't be processing your data, but you don't want us to erase it
- We no longer need the data, but you need it to establish, exercise or defend legal claims or
- You have objected to the processing as we are in the process of verifying whether we have legitimate grounds to keep processing the data

11. Right to correct any mistakes in your personal data

You can require us to correct any mistakes in your information which we hold. If you would like to do this, please:

- Email, call or write to us (see “How to contact us” section)

- Let us have enough information to identify you (e.g. account number, registration details) and
- Let us know the information that is correct and what it should be replaced with.

12. Rights to erasure

You have the right to request the erasure of your personal data which we hold about you where the personal data is no longer necessary, where you have withdrawn your consent or where you feel that there is no lawful reason for us to process your personal data.

13. Data Portability

You may ask for an electronic copy of your personal data provided to us and which we hold electronically, or for us to provide directly to another party.

14. Right to ask us to stop contacting you with direct marketing

You will be given an opportunity to opt out each time we send a marketing communication to you electronically. You can withdraw your consent for direct marketing purposes. If you would like to do this, please:

- Email, call or write to us (see “How to contact us” section).
- Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- Let us know what method of contact you are not happy with if you are unhappy with certain ways of contacting you only (for example, you may be happy for us to contact you by email but not by telephone).

We will provide you with information on action taken on a request to stop direct marketing- this may be in the form of response email confirming that you have “unsubscribed”.

15. How to contact us

The controller of your information is PrePayPower having its registered office at:

PrePayPower Limited, Paramount Court, Corrig Road, Sandyford, Dublin 18, D18 R9C7. You can address any question, comment or request regarding your information to broadbandprivacy@prepaypower.ie or by post to the address above.

If you would like to make a complaint on how we have handled your personal information, please contact us who will investigate the matter and report back to you. If you are not satisfied after our response you also have the right to the Data Protection Commissioner. Information about how to do this is available on his website at <https://www.dataprotection.ie>.