



Privacy Policy

1 WHO ARE WE?

1.1 This privacy policy pertains to UCG Group Ltd, registered under company number 15412627, situated at 128 City Road, London, United Kingdom, EC1V 2NX. Our services encompass telephony, broadband, and fibre services. As the data controller, we are accountable for your personal data.

1.2 Oversight of personal data matters is vested in our Data Protection Officer, who can be reached at the following address:

The Data Protection Officer
UCG Group Ltd
128 City Road
London, United Kingdom
EC1V 2NX
hello@theucg.co.uk

1.2 Effective from 1 January 2024, this privacy policy supersedes all prior versions.

2 WHO DOES THIS PRIVACY POLICY APPLY TO?

2.1 This privacy policy extends to:

- a) Customers;
- b) Prospective customers;
- c) Individuals utilizing our websites;
- d) Former customers;
- e) Nominated users or individuals acting under a power of attorney.

2.2 Our services are not designed for children, unless explicitly stated otherwise. We do not knowingly collect or process personal data pertaining to children or individuals under 18 years of age.

2.3 Ensuring the accuracy and currency of the personal data we hold about you is imperative. It is your responsibility to inform us of any changes to your personal data by contacting our data team at hello@theucg.co.uk.

3 WHAT INFORMATION DO WE COLLECT?

3.1 Personal data constitutes any information identifying a natural person. To facilitate the provision of our services, we may collect, utilise, store, and transfer various categories of personal data, including but not limited to:



- a) Identity data such as first name, last name, title, date of birth, and gender;
- b) Contact details encompassing service address, correspondence, company name, billing address, email address, landline telephone number, and mobile phone number;
- c) Financial data including bank account details for direct debit, payment card details, and credit rating;
- d) Transaction-related data detailing payments to and from you, and information about the products and services you have procured from us;
- e) Technical data like IP address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, online chat logs, and device information;
- f) Usage data on our network across all products and services;
- g) Data concerning your marketing and communication preferences.

3.2 Additionally, we may collect and utilise non-personal data, such as statistical or demographic data, derived from personal data but incapable of identifying you.

4 HOW DO WE COLLECT INFORMATION?

4.1 Information may be gathered through various means:

- a) Voluntary submission of information when placing an order for our services, contacting us, or participating in trials, surveys, or competitions;
- b) Automatic collection of information during service usage or website visits, utilising technologies like cookies and similar tools for improvement purposes;
- c) Receipt of information from third-party sources, including companies aiding in service provision, telecommunications operators, marketing organisations, and credit reference agencies or fraud prevention agencies.

5 HOW DO WE USE INFORMATION?

5.1 The information collected aids in comprehending your requirements and enhancing service provision.

5.2 Examples of information utilisation include:

- a) Identity verification during service usage or contact;
- b) Processing of inquiries, orders, or applications, including the use of automated decision-making systems;
- c) Conducting credit checks and managing accounts;
- d) Monitoring, recording, storing, and using electronic communications for training and quality improvement purposes;
- e) Provision of information about additional services, offers, or products based on your preferences;



- f) Notification of changes to our websites, services, or terms and conditions;
- g) Conducting marketing analysis, profiling, or creating statistical or testing information to personalise services and understand customer preferences;
- h) Debt recovery;
- i) Service analysis for improvement;
- j) Crime, fraud, or misuse prevention, and investigation;
- k) Network traffic monitoring for backup and problem-solving purposes.

5.3 Your data may be employed for purposes to which you have expressly consented or when required by law.

5.4 We may enhance directly collected information with data from third parties to improve customer services or products.

6 WHEN WILL WE SHARE YOUR DATA WITH OTHERS?

6.1 Information sharing with external organisations may be necessary to facilitate service provision.

6.2 Categories of non-UCG Group parties with whom we may share your details include:

- a) Third-party suppliers assisting in service provision;
- b) Professional advisors;
- c) Law enforcement agencies;
- d) Other companies in the event of business sale or transfer;
- e) Regulators such as Ofcom or the ICO.

6.3 External entities handling your personal information must adhere to applicable UK data protection laws and ensure information security.

7 PROTECTING INFORMATION

7.1 We prioritise data protection and implement appropriate organizational and technical security measures to safeguard against unauthorised disclosure or processing.

7.2 While efforts have been made to create a secure website and mobile application, we cannot guarantee the security of information transmission over the internet. We bear no responsibility or liability for personal information transmitted via the internet.

8 WHY DO WE PROCESS YOUR DATA?

- 8.1 Personal data processing serves various purposes:
- a) Contractual obligations with you for service provision;



- b) Legitimate business interests;
- c) Legal obligations;
- d) With your consent, which can be withdrawn at any time.

8.2 Failure to provide necessary data may result in inability to fulfill contractual obligations, potentially leading to contract termination.

9 TRANSFERS OF DATA OUTSIDE THE EEA

9.1 Data sharing with third parties outside the EEA is subject to contractual arrangements ensuring adequate protection, in compliance with applicable UK data protection laws.

10 HOW LONG DO WE HOLD YOUR INFORMATION FOR?

10.1 Unless specific regulatory or legal requirements dictate otherwise, we retain information for the duration necessary to fulfill its intended purpose.

11 YOUR RIGHTS

11.1 As a data subject, you possess various rights concerning your personal data, including:

- a) Subject access requests;
- b) Right to erasure;
- c) Rectification;
- d) Withdrawal of consent;
- e) Objection and restriction of processing;
- f) Right to data portability.

12 COMPLAINTS

12.1 If you wish to lodge a complaint regarding our personal data usage, contact our Data Protection Officer. Alternatively, complaints can be directed to the UK data protection regulator, the Information Commissioner's Office (ICO).

13 CHANGES TO THIS PRIVACY POLICY

This privacy policy may be updated periodically, with revised versions posted on our website. It is advisable to review this policy periodically.