

## Privacy Policy

### Introduction

Broadband for Surrey Hills Ltd (B4SH) is a Community Benefit Society that exists to provide high speed broadband to rural premises, especially those areas that are poorly served. Our customers, investors and volunteers rely on B4SH to treat them fairly, and this includes how B4SH manages their personal information.

### General

Broadband for Surrey Hills Ltd ('data controller') processes personal data for the following reasons:

1. To deliver broadband and related services under contract and to take steps to enter into such a contract
2. To raise investment for the society
3. To engage with volunteers to facilitate growth of the network
4. To comply with our legal obligations.

All personal data is either stored on our own servers or in paper format on the premises. No data is transferred outside the UK. We do not share personal data with third parties other than to fulfil legal or regulatory requirements, as allowed by law or for debt collection purposes.

We do not pass your data on to third parties for marketing purposes. We may use your data to inform you of new broadband-related products and services (eg VOIP) that we may provide in the future.

We do not use your personal data for profiling or automated decision making.

We do not collect or process special categories of data.

We do not collect personal data from third parties other than that which is already in the public domain or in order to enter into a service contract (we do not count named B4SH volunteer group champions as third parties).

We do not retain personal data for longer than 7 years unless there is a legal obligation or reasonable reason to do so.

We do not process personal data on children, other than as nominees under the age of 18.

### Categories of Data Subject

#### - Investors

We process personal data provided by you as part of the process of applying to be a member of B4SH, to purchase shares in B4SH and to be eligible to claim HMRC Social Investment tax relief (SITR). The personal data is collected for a mixture of contractual and statutory reasons. We share personal data with HMRC as required under the SITR regulations.

#### **- Lenders**

We process personal data provided by you within the loan agreement. The personal data is collected for a mixture of contractual and statutory reasons. We share personal data with HMRC as required.

#### **- Customers**

We process personal data provided by you within the service contract. We do not share this information with third parties, other than as required by a court order or as part of a Police investigation. We use a third party (GoCardless) to process direct debit payments, but we do not pass any personal data to them.

#### **- Volunteers**

We do not routinely process personal data on volunteers, unless they are also included in one of the above categories.

We keep a record of contact details of current B4SH volunteer champions, and obtain their permission before passing their details to enquirers in their area.

#### **- Newsletter**

We process information provided by you if you have registered to receive our newsletter. You can unsubscribe at any time from the newsletter by clicking the unsubscribe box at the bottom of the newsletter.

### **Expressions of interest**

We process information provided by you if you express an interest in taking B4SH service or enquire about volunteering to build the network to your area. We may pass your contact details to local volunteer champions so that they can gauge levels of interest or to contact you to link you to a volunteer group.

### **Your rights**

You have the right to withdraw consent at any time to us holding your personal data, where there is no good reason for processing to continue.

You have the right to receive a copy of the personal data we hold on you and the right to rectify any inaccurate data.

You have the right to have your personal data deleted from our records if we have no reasonable reason to retain it.

You have the right to object to your personal data being used for the purposes of direct marketing.

You can contact B4SH at:

Email: [enquiries@b4sh.org.uk](mailto:enquiries@b4sh.org.uk)

Tel: 07437 165949

Web: [www.gigupanddown.net](http://www.gigupanddown.net)