

Privacy Policy

We take privacy and the protection of personal information seriously. This Privacy Policy sets out details about how we gather, use and share personal information and about individual privacy rights. How we use personal information depends upon the context in which it is made available to us.

Who are we?

HBT Communications was formed in 1988 and now has 30 years' experience of advising customers on the right telecommunication solution, VOIP and Calls, hardware, Internet Connectivity, Hosted Telephony, IT Security, software licensing and general IT services and solutions currently available.

HBT Communications is a company registered in England and Wales, with company number 025755331. HB Telecom (UK) Limited trading as HBT Communications.

Data Protection Officer

Our Data Protection Officer (DPO) provides help and guidance to make sure we apply good practice standards to protecting personal information. Our DPO can be reached by email at a.hussain@hbtcommunications.com if you have any questions about how we use personal information.

How do we collect information?

We obtain information about you in different ways such as:

- When you interact with us directly: This could be speaking with us at networking events at which we agree to swap business details in order to keep in touch and for us to send you news and offers by email. We may also use your telephone number to make contact with you. This includes when you email us, phone us, visit our website, or in person.
- When you visit our website: We gather general information which might include which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We also use "cookies" to help our site run effectively. There are more details below – see 'Cookies'.



Where you apply for a role with us, we will process the
personal information you provide to us as part of your application and any
interview selection process. This will ordinarily include your name, personal
contact details, professional history, education and qualifications and
references. We may also collect and use some special categories of personal
data about job applicants, such as information about an applicant's racial or
ethnic origin and some health information regarding any medical conditions or
disabilities.

Legal basis

We process the personal information of our business contacts as necessary for the legitimate interests of managing the day-to-day operation of our business to administrator your account and to provide the products and services you have requested from us or our partners. Also, including correspondence, engaging suppliers, and promoting our services to business contacts.

For job applicants we process the personal information of job applicants for the legitimate interests of determining whether or not to employ a particular individual for a role in our organisation. Where we decide to employ a job applicant, we process their personal information for the purposes of entering into and performing our employment contract with the applicant. We process racial and ethnic origin and health information of job applicants for the purposes of meeting our legal obligations under employment and similar laws

We will never retain personal information for any longer than is necessary for the purposes we need to use it for.

Generally, in respect of personal information gather in the context of a contract, we will retain personal information for the duration of the contract and a period of up to six years after the contract has expired or terminated in case such personal information is required for the exercise or defence of a legal claim during this period.

We may also retain personal information for as long as required by law or regulation or instruction of a relevant accreditation body.

Unsuccessful job applicant information is retained for a period of 12 months after the position has been filled.

We will retain the personal information of business contacts that receive our newsletter until they opt-out or unsubscribe from our newsletter.

We only share personal information with third parties:

(a) to the extent necessary for fulfilling the purposes outlined as above, including where necessary for the provision of services;



- (b) where we are under a legal or contractual obligation to do so; or
- (c) where is it fair and reasonable for us to do so in the circumstances.

We may share personal information with the following third parties:

- (a) We use a number of different suppliers, payment processors and consultants, with whom we share personal information so that these suppliers can process personal information on our behalf. In these circumstances, we take steps required by data protection laws to ensure that these suppliers protect the personal information we share with them;
- (b) and Government bodies where we may be required by law to share personal information with government bodies and regulators (such as HMRC).

Cookies

HBT Communications website uses cookies, cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow our website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your area of interest. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting browser preferences. Turning cookies off may result in a loss of functionality when using our website.

Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.



Individual rights

Individuals are entitled to exercise any of the following privacy rights in respect of our processing of personal information:

- (a) Access: Individuals can request access to a copy of their personal information held by us, along with details of what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision-making.
- (b) Rectification: Individuals can ask us to change or complete any inaccurate or incomplete personal information held about them.
- (c) Erasure: Individuals can ask us to delete their personal information where it is no longer necessary for us to use it, or where we have no legal basis for keeping it.
- (d) Restriction: Individuals can ask us to restrict the personal information we use about them where we are not able to erase their personal information or where an individual has objected to our use of their personal information.
- (e) Object: Individuals can object to our processing of their personal information.
- (f) Portability: Individuals can ask us to provide them or a third party with some of the personal information we hold about them in a structured, commonly used, electronic format so it can be easily transferred.
- (g) Withdraw Consent: Generally, we do not require consent to process personal information and so we do not ordinarily ask for consent to process personal information. However, where we do ask for consent to process personal information, individuals have the right to withdraw their consent at any time.

Please make all requests to exercise privacy rights in writing to a.hussain@hbtcommunications.com.

We are required to verify the identity of anyone requesting to exercise their privacy rights and we may ask individuals to provide valid identification documents when making a request to allow us to do this.

We will not make any charge for responding to any request from an individual exercising their privacy rights, and we will respond to any requests in accordance with our obligations under data protection laws.

Individuals can make a complaint about how we have used their personal information to us by contacting us as noted above, or to the ICO (https://ico.org.uk/concerns/).



Effective

This Privacy Policy is effective as of 5th May 2018 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this privacy policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

If you have any questions about this Privacy Policy, please contact us at the below:

Telephone: 0844 415 3666