



PRIVACY AND COOKIE POLICY

You are reading VFM's Privacy and Cookie Policy (the "Privacy Policy"). By registering or placing an order on this website you consent to the collection, use and transfer of your information under the terms of this Privacy Policy.

INFORMATION ABOUT US

Vision Fibre Media Ltd ("VFM") is a full fibre Internet Service Provider ("ISP"). We are a limited company registered in England and Wales under company number 8003317 whose registered office is Silavco Technology Centre, Compass Point, St Ives, Cambs, PE27 5JL. Our VAT number is 159 7127 80.

We are regulated in the UK by Ofcom. We are also a member of the UK Internet Service Providers Association ("ISPA") and CISAS (the provider of an independent alternative dispute resolution scheme) about both of which you may find further details in our Code of Practice and/or our Fair and Acceptable Usage Policy.

ABOUT THIS PRIVACY POLICY

VFM is committed to protecting and respecting your privacy. This Privacy Policy (together with our term of use and all other applicable standard terms and conditions sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. When we refer to "personal data" in this Privacy Policy, we mean data, which identifies you as an individual, or is capable of doing so. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

VFM has notified the Information Commissioner's Office of its activities in accordance with the Data Protection Act 1998 (Registration No. ZA050812). This notification can be viewed at www.ico.gov.uk.

For the purpose of the Data Protection Act 1998 (the "Act"), the data controller is VFM Ltd.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide by filling in forms on our website at www.visionfibremedia.com ("our website") or by communicating with our Customer Service agents by telephone or on paper forms signed and submitted to us by you. This includes information provided at the time of registering to use our website, subscribing to our services, posting material, communicating with our customer support team, or requesting further services and may be provided to us via our website, written correspondence, electronic communication (such as email) or by telephone. We may also ask you for information when you enter a



competition or promotion sponsored by VFM Ltd, and/or when you report a problem with our website or services.

- The types of personal data we will collect may include details of your title, name, address, telephone numbers, email address, bank details and perhaps debit or credit card number, and date of birth.
- When you (or someone using your telephone line) make a telephone call or send a fax that uses our telephone network or connect to the Internet, we keep a record of that call (including the number called) to enable VFM to charge for it. We also receive information from other operators about calls made over our network, where we need that information for connecting and billing purposes.
- If someone abuses or damages the VFM telephone network, for example by making offensive or nuisance calls, we may keep information relating to that abuse.
- If a customer abuses the VFM Internet service or any other services we provide, for example by breaching any of part of our Fair and Acceptable Usage Policy, we may keep any information relating to that abuse.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our website and of the fulfillment of your orders.
- We will hold information about your use of our services (such as the amount of time you spend online), which we will use to manage our network and for billing.
- Details of your visits to our website (including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise) and the resources that you access.
- We may ask you questions, from time to time, regarding the use you make of the services we provide, the other services you would like us to provide in the future and regarding any other information, such as lifestyle data. This information will only be used internally to enable us to improve the quality of our service and to provide additional services to you. This information will not be published on our website. We may also use your data to perform statistical analysis to help understand how people are using our services so that we can improve them.
- When you order services from VFM, we may make enquiries about you for credit reference purposes. These enquiries include searching your records held by Experian/Equifax or any other credit reference agency or any fraud prevention scheme. At all times, where your information is disclosed to us, we will protect it in accordance with this Privacy Policy and keep it secure.



You can contact us at any time either to obtain details of any personal information we are holding about you or to make changes to this information. If you need to access or change your personal information, simply contact support@visionfibremedia.com, quoting your name and address and, if you are an existing customer, your customer ID or you may write to us at our address set out under "Information about Us" at the beginning of this Privacy Policy. Please note that we will need to confirm your identity before providing you with details of any personal information we may hold about you.

IP ADDRESSES

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

COOKIES

For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on your browser or the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and to deliver a better and more personalised service. Some of the cookies we use are essential for our website to operate.

If you register with us or if you continue to use our website, you agree to our use of cookies.

Cookies are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website. A cookie is a small text file we pass to your computer's hard disk through your web browser so the website remembers who you are when you return.

VFM uses the following cookies in its website to give you a more personalised web service.

The first type is known as a "session-based" cookie and is allocated to your computer only for the duration of your visit to our website. It helps you to move around the website faster. This cookie automatically expires when you close down your browser.

We use a type of cookie called a "persistent" cookie. These cookies store information between visits. For example, if you select the 'Remember me on this computer' box your username and password is saved in a cookie on your computer. This means next time you log on to the site using that computer you will not need to re-enter those details. We suggest you do not select the 'Remember me' box if you use a shared computer (for example, if you access the Internet at a cafe, or at a shared or publically available computer). However, you will still need to



use your username and password to access your profile. The cookie file itself does not store your personal information.

Finally, VFM uses Google Analytics to track use of our website and to help us to analyse how users use the site. Google Analytics uses cookies to gather statistics about our visitors, such as where you come from before entering our websites and which websites you go to afterwards. Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activity and providing other services relating to website activity and internet usage. Information collected in this way is anonymous and individuals cannot be traced. This information allows us to improve our website and our services, for example, to assess the impact of and develop our advertising campaigns and services.

The information generated by the cookie about your use of our website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google undertakes not to associate your IP address with any other data held by Google.

If you have Adobe Flash installed on your computer (most computers do) and you use VFM's audio or video players, Google Analytics will try to store some additional data on your computer. This data is known as a Local Shared Object or Flash cookie. This helps us to analyse the popularity of our media files. We can count the total number of times each file is played, how many people watch videos right to the end and how many people give up half way through. Adobe's website offers tools to control Flash cookies on your computer.

For more information about Google Analytics, please see their privacy policy at: <http://www.google.com/intl/en/privacy/privacy-policy.html>.

Except for essential cookies, all cookies will expire after 12 months.

You can block cookies by activating the setting on your browser, which allows you to refuse the setting of all or some cookies. If you want to stop cookies being stored on your computer in future, please refer to your browser manufacturer's instructions by clicking "Help" in your browser menu.

However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon you visit our website.

If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies.

You can learn about and opt out of a number of commercial third party cookies (including some used by VFM) at www.networkadvertising.org/choices. Some of the



opt-outs [used by our commercial service providers] require a cookie to be placed on your computer, which is only used to tell the relevant cookie servers not to send you any further cookies. This can be quite handy, but note that if you routinely delete cookies from your temporary internet files, it may be necessary for you to repeat the opt-out process, the next time you visit our website.

For more information about deleting and controlling cookies visit www.youronlinechoices.co.uk or www.aboutcookies.org.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the design, building, or support of our business systems and website. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a customer id, password(s) or log-ins which enable you to access certain parts of our website, you are responsible for keeping the customer id, password(s) or log-ins confidential. We ask you not to share your customer id, password(s) or log-ins with anyone. The secrecy of your account information and the use made of our services from your account is your responsibility. Please be sure to keep this information safe, and do not share it with others.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will make every effort to ensure its security including the use of strict procedures and security features to try to prevent unauthorised access.

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- To ensure that content from our website is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations or exercise our rights arising from any contracts entered into between you and us (including, without limitation, to maintain your



account, to obtain credit references, to provide you with service and billing information and updates and to respond to questions or queries you've sent us).

- To allow you to participate in interactive features of our service, when you choose to do so.
- To obtain your views, improve our services and provide you with information that makes our services more useful to you.
- To notify you about changes to our service.

If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you or which you have registered to receive information about.

If you are a new customer, we will contact you by electronic means only if you have consented to this.

If you do not want us to use your data in this way, please do not tick the relevant boxes situated on the form on which we collect your data (the registration or order form). We will retain your information for a reasonable period or as long as the law requires.

DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any of our employees and agents to deal with any accounts, products and services provided to you by VFM now or in the future or to any member of our group (or any of their employees or agents) now or in the future, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our applicable standard terms and conditions or terms of use and other agreements; or to protect the rights, property, or safety of VFM Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and when required to do so by law, for example under a court order, or in response to properly made demands, under powers contained in legislation.
- We may provide information, in response to properly made requests, for the purposes of the prevention and detection of crime and the apprehension or



prosecution of offenders. We may also provide information for the purpose of safeguarding national security. In either case, we do so in accordance with the provisions of the Data Protection Act 1998.

- As a normal part of our business, we share with other communications companies' information for connecting and charging for calls over each other's networks.
- We make our customers' telephone numbers available to directory enquiry services, unless the customers have chosen to be registered ex-directory.
- We may search the files of a credit reference agency, which will keep a record of that search, when you apply for service. Additionally, details of how you conduct your account may also be disclosed to the agency. This information may be used by other organisations in assessing applications from you and members of your household.
- If a third party is acting on our behalf (which may include third party service providers based in a jurisdiction which does not treat data as securely as the UK does).
- If we have your consent to do so (either under this Privacy Policy or with your express consent from time to time).

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data.

You can also exercise the right at any time by contacting us at support@visionfibremedia.com or you may write to us at our address set out under "Information about Us" at the beginning of this Privacy Policy.

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.