

## PRIVACY POLICY

This privacy and cookies notice applies to the processing of personal data, including information we collect and store via cookies, as explained below by:

- ZYBRE Limited, if you access our UK products and services or our online digital platforms

References in this policy to “ZYBRE”, “we”, “us” or, “our” should be interpreted accordingly. The processing explained in this notice may be carried out by ZYBRE or other data controllers in the ZYBRE group of companies.

If you access the products and services of other ZYBRE companies and businesses, you should refer to their privacy notices.

### TYPES OF INFORMATION WE PROCESS AND WHERE IT COMES FROM

- Information you’ve provided to us, including through our websites, applications or products, or when you access our services through applications on websites operated by other organisations.
- Information about our content, products and services you’ve ordered or enquired about, including as collected call recordings or via Live Chat, as further described below.
- Information which we acquire from other organisations, such as address verification services (e.g. Royal Mail in the UK), data brokers who supply us with contact information and modelled (i.e. predicted) household profile information such as affluence and household composition (e.g. Experian), property and lifestyle companies and credit reference agencies including personal data that is publicly available. We acquire data from several organisations. If you want to manage how these organisations use your personal data and share it with companies like ZYBRE, you should get in touch with them directly.
- Information, uploads, user generated content, and comments you make about, or generate, in accessing the shows, channels, programmes, advertisements, products and services you use, for example, how you or your household access, view, share, contribute to, communicate with, record or fast forward, download or interact with them.
- Information from the devices you use to receive ZYBRE content, products and services, about you, and your household’s use of ZYBRE, and/or third-party content, products and services. This includes information about your device, machine or browser.
- IP addresses, MAC addresses, unique identification numbers, online identifiers (including device IDs and advertising IDs), browser information, location data port information, logical network address, and other similar identifying information required for your devices to communicate with websites and applications on the internet.
- Technical information from the devices you use to receive ZYBRE content, products and services, for example, the collection of diagnostic and traffic or location information. Note that devices and applications have their own privacy settings and notices under which they collect your information, so please check and manage your device and application settings.
- Information relating to your customer service interactions with us.

### HOW WE USE YOUR INFORMATION

The main purpose for which we process your personal data is so that we can provide you with content, products and services, in accordance with the contract you have with us. This includes providing you with account management functionality (such as to update your contact information), processing and collecting payments, customer support (including diagnostics and troubleshooting), call screening and blocking, and tailored and personalised recommendations (including by sending you newsletters about your service, content and relevant products).

We also process your data to deliver services to you under our contract in the following ways:

- In order to enter into loan agreements with you, we obtain personal data about you from credit reference agencies. We then take automated decisions using personal data about whether or not to enter into the loan agreement with you. This decision is influenced by your credit history and, depending on the outcome of this automated decision-making process, we may not enter into the loan agreement with you. If you would like us to review decisions taken about you as part of this process, please contact us as set out below.
- In order to manage our products and services and traffic across our network. For example, ZYBRE uses your information to facilitate the operation of its network by choosing the most efficient route to transmit your requests for a communications service through the various parts of its network of equipment and systems. This information is held securely within restricted areas, accessible only by authorised personnel and in accordance with our data retention, deletion and acceptable use policies;
- In order to send newsletters to you about your service, content and relevant products.
- Determine your eligibility and then enable your ability to access special offers, discounts and rewards.

If you're a ZYBRE customer, where you give us consent, we will process your data in a number of ways, including:

- In order to send you direct marketing. This may include communications by post, telephone, SMS, email or other electronic means (such as push notifications and in-product notifications), using the contact details you have provided, about us and our content products and services, events and special offers, including, for a reasonable time after you have ceased to be a customer of ours (see further details below). We may also send you 'abandoned basket' marketing if you provided us your contact details (and given us consent to use them for marketing) during our online sales journey but didn't complete your purchase. We will tailor the marketing based on what you added to your basket.
- In order to process special category data you've provided to us. This may include using data you have provided us or to our business partners concerning your health to provide assistance and support on your account; and using biometric data in some scenarios as part of consumer credit agreement authorisations.

We may also use your information to comply with our legal and regulatory obligations. This includes:

- By enabling ZYBRE to support customers whose circumstances might make them vulnerable in order to comply with Ofcom's consumer protection conditions; and
- By complying with police and other security investigations.

In some circumstances, we may process your personal data in reliance upon our legitimate interests, including to:

- Improve our content, products, services and customer experiences by monitoring your use of our products and services and working with our suppliers to improve the products and services we offer, and develop new content, products and services;
- Monitor, record, store and use customer service communications we have with you. This helps us to improve the quality of our customer service, to confirm any instructions you give us, to create a customer profile to have better conversations and/or for training, development and to meet our legal and regulatory responsibilities.
- Determine what offers for our products and services you are eligible for and how those offers will be made available to you. To do this, we create a profile about your time as a ZYBRE customer (for example, what products and services you have purchased, how you have used them, your offer and payment history, and your interactions with our customer service agents) and supplement this with information provided to us by other organisations as described in this notice. We use these profiles to target our offers at particular groups of customers and personalise the messages.

- In some cases, we rely on legitimate interest to send you direct marketing – for example, if you’re a prospective customer. This may include communications by post, email or other electronic means (such as push notifications and in-product notifications), using the contact details you have provided, about us and our content, products and services, events and special offers, including, for a reasonable time after you have ceased to be a customer of ours (see further details below). This may also involve processing your data for online and digital advertising (see below at ‘How we share your information for online and digital advertising’).
- For market research.
- Protect or enforce our rights or the rights of any third-party and prevent an detect fraud, including by analysing activity on our network to help block unauthorised or illegitimate content, publication of, or access to it.
- Help prevent and detect crime and for the purpose of public and road safety.

We will also process your data where we need to in order to safeguard your vital interest or those of another person, for example to support crime prevention and protect the safety of members of the public and ZYBRE employees.

## **HOW WE SHARE YOUR INFORMATION**

We work with a number of suppliers to process your personal data for the purposes described above. Where these suppliers act on our behalf and must only process your personal data in accordance with our instructions. These categories of suppliers that we use include:

- Engineer services firms
- Couriers (who may also process your contact data as a data controller when arranging or communication with you about your deliver)
- Payment service providers
- IT and Information Technology and services companies
- Customer service centres
- Debt collection agencies
- Other ZYBRE group companies
- Credit reference agencies (see further below)
- Warranty companies (see further below)
- Data brokers. This includes Experian who we use to match ZYBRE’s own data with data provided by brands in order to identify households to target for specific advertising campaigns.
- Marketing companies that deliver our communications.

Sometimes we share personal data with suppliers and business partners who may process it outside of the European Economic Area. Most of the time the data we share will be with companies who supply services to us to enable us to supply our services to you.

One of ZYBRE’s data processors may contact you to ensure you are satisfied with your service experience and to let you know about the warranties that apply to your ZYBRE equipment and the options for extended cover.

In the event the structure of our business changes so that another company in the ZYBRE group provides our products and services to you, we will pass your information to that company. This includes, for example, a merger between us and another company, where another company acquires us or some or all of our assets, where we acquire another company or where our holding company restructures our corporate group.

We share your personal data with credit reference and fraud prevention agencies for use in automated credit decisions, for the detection and protection against crimes such as fraud and money laundering, and for debt

recovery purposes, as further explained below. Where we carry out a credit check with a credit reference agency, the information that we give them (including details of your credit application and financial details) and the details of the search itself will be recorded by that credit reference agency. We also exchange information with credit reference agencies on payment performance under your credit agreement on an ongoing basis and this information could be used by us and third parties to make future credit assessment decisions. As part of your credit check, the credit reference agency may also review information in relation to individuals who are financially linked to the primary applicant. If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or we may stop providing existing services to you. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. Whenever fraud prevention agencies transfer your personal data outside the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to “international frameworks” intended to enable secure data sharing. Where appropriate, we may also share your data with other organisations to assist with the prevention and detection of fraud.

We may share your personal data with debt collection agencies where there is an outstanding debt owed on the account. We do this so that they can use the information, alongside other information that they hold, to attempt to contact you on our behalf so that we can recover the debt. In some cases, where we have been unable to recover the amount owed, we may sell the debt to a third-party debt management company. You will be informed when this takes place and following the sale of the debt, any questions you have about communications you receive should be directed to the company in question.

We share certain personal data with third-party app and content providers (such as AntStream Arcade and Blacknut) when you choose to pay and/or access those third-party services via ZYBRE. We do this solely to enable and/or verify your ability to access the relevant third-party service via ZYBRE and this personal data is held on a joint controller basis with the relevant third-party (meaning we use and share the data for the joint purpose of ensuring your access to the service). The way those third parties use any other personal data you have provided to them (which is separate from the jointly controller personal data we share with them) should have been explained when you signed up to their service and in any event can be found by visiting their relevant third-party app or website and locating their privacy policy.

We share personal data with the courts, enforcement agencies (e.g. the police), and with the regulatory authorities (e.g. OFCOM in the UK) where this is required, in order for us to comply with our legal and regulatory obligations.

Where ZYBRE receives a request for the ownership of a vulnerable customer’s account to be transferred to a nominated individual, personal data of the existing account holder may be shared with the new account holder. The ownership of the account would only be transferred once ZYBRE has received signed acceptance and authorisation of the transfer from both parties.

## **HOW WE USE YOUR INFORMATION FOR ONLINE AND DIGITAL ADVERTISING**

We work with a number of trusted partners to process your personal data for online and digital advertising purposes on ZYBRE and third-party websites and apps. We use information collected through cookies or similar technologies on our websites, apps and devices (such as device IDs, mobile advertising IDs, and IP addresses). We may also use your phone number and email address. We will never share your name and physical address with any of our partners, and where we share an email address or phone number, it will be in a hashed format (which means it has been converted into a stream of numbers or letters to make it more secure), and our partner will only see that data if it is already used for an account on their site. Where we use cookies and similar technologies on our third-party websites, apps, and devices (which you will separately be asked to accept), the data may be used in conjunction

with other information we hold about you, such as your browsing behaviours, ZYBRE viewing history, product holding, account history and ZYBRE ID preferences so we can show you more relevant content or offers. We perform due diligence before a company becomes a partner to ensure they are able to handle your data in a secure and responsible manner.

If you don't want your data to be matched with the social media sites you use, let us know using one of the methods in the 'Managing your marketing preferences' section below. You might still see ZYBRE posts or adverts on those sites, but they won't be personalised using your ZYBRE account data. You can also change your settings on that social media site to control the promoted posts you see there.

Where our partners are based outside of the European Economic Area, we work with these partners to make sure personal data is processed only if appropriate measures and controls are in place to protect your personal data in accordance with applicable data protection laws and regulations and regulatory guidance. Any data transfers will only take place on the basis of an approved data transfer mechanism as described in the section 'How we share your information' above.

## **KEEPING YOUR DATA UP TO DATE AND YOUR RIGHTS**

You can contact us via My ZYBRE on [zybre.co.uk](https://zybre.co.uk) or on 0330 320 2062 or by emailing [hello@zybre.co.uk](mailto:hello@zybre.co.uk) for ZYBRE to update, amend, correct your information. You also have the following rights:

- To request access to, or erasure of, the personal data we hold about you (we explain more about this below).
- To request us to restrict the processing of the personal data we hold about you.
- To object to us processing personal data relating to you.
- Where you have given us consent to process your personal data, you have the right to withdraw that consent at any time.
- You have the right to obtain certain personal data from us in a format that can be transferred electronically to a third-party (also called "data portability").

Please note that some of these rights are not absolute. In some cases, for example, we may refuse a request to exercise particular rights if complying with it meant that we are no longer able to meet our contractual obligation to provide you with particular products and services, or if we had a legal obligation or right not to comply with the request. However, we will keep you informed as to the actions that we can take, when you make your request.

## **MANAGING YOUR MARKETING PREFERENCES**

Direct marketing and tailored advertising

You can always choose not to receive direct marketing or tailored advertising from us in the following ways:

- Via My ZYBRE on [zybre.co.uk](https://zybre.co.uk)
- Clicking on the "unsubscribe" link or replying STOP in any electronic marketing information from us
- Calling ZYBRE on 0330 320 2062
- Emailing: [hello@zybre.co.uk](mailto:hello@zybre.co.uk)

When you make a request not to receive marketing, it can take us up to one month to process that request. If you receive direct marketing from other ZYBRE group companies in relation to other ZYBRE services you can choose not to, by contacting them directly.

## **COOKIES AND ONLINE BEHAVIOURAL ADVERTISING**

Please see the section on 'Controlling my cookies' on our Cookie notice.

## COOKIE POLICY

Cookies are created when you visit a website or use an app. They are basically small text files that are stored on your device and customise your experience. That file may store some info about your preferences based on anything you set last time you visited us. We also use cookies for other reasons, like advertising and marketing, experimenting with different layouts on the website, measuring your visits to the site and understanding your preferences. This means we can show you personalised advertising, offers and content that are just for you. Want to know more? Find more detailed info on how we use cookies below.

When you create or log in to an online account, you agree to a cookie banner which provides a link to this notice. Otherwise, by continuing to use our websites, content, products or services, you agree to the use of cookies as described in this notice.

If you'd like to learn how to manage these cookies and choose whether or not to receive information of different types, please see the section "Controlling My Cookies" below.

### WHAT ARE COOKIES AND HOW DO THEY WORK?

Cookies are small bits of text that are downloaded via the internet to the devices you use to receive ZYBRE content, products and services and access online information. Your browser on your device makes these cookies available every time you visit the website again, so it can recognise you and can then tailor what you see on your device.

### WHAT DO YOU USE COOKIES FOR?

Cookies are an important part of the internet. They make using devices and accessing online information much smoother and affect lots of the useful features of websites. There are many different uses for cookies, but they fall into four main groups.

#### ***Cookies that are needed to provide the content, product or service you have asked for***

Some cookies are essential to help your devices download or stream the information, or so you can move around websites and use their features. Without these cookies, content, products or services you've asked for can't be provided.

Here are some examples of essential cookies:

- Positioning information on a smartphone screen, tablet device or other screen so that you can see the website and use its functionality.
- Keeping you logged in during your visit or enabling you to stream content. Without cookies, you might have to log in on every website you visit, or repeatedly adjust your volume and viewing settings.
- When you add something to the online shopping basket, cookies make sure it's still there when you get to the checkout and to personalise our 'abandoned basket' marketing (where you have asked us to send you marketing) described in our Privacy Notice above.
- Some are session cookies which make it possible to navigate through the website smoothly.

#### ***Improving your browsing experience***

Cookies allow the application or website to remember choices you make, such as your language or region, and they provide improved features.

Here are a few examples of some of the ways that cookies are used to improve your experience on our applications and websites:

- Remembering your preferences and settings, including marketing preferences, such as choosing whether you wish to receive marketing information.
- Remembering if you've filled in a survey, so you're not asked to do it again.
- Remembering if you've been to the application or website before.
- Restricting the number of times, you're shown a particular online advertisement. This is sometimes called 'frequency capping'.
- Showing you information that's relevant to content, products or services that you receive.
- Giving you access to content provided by social-media sites like Facebook or Twitter.
- Showing 'related article' links that are relevant to the information you're looking at.
- Remembering an application or website you've entered, such as weather forecasts.

### ***Analytics***

We like to keep track of what websites, information and links are popular and which ones don't get used so much, to help us keep our information relevant and up to date. It's also very useful to be able to identify trends of how people navigate (find their way through) our information and when and where 'error messages' may originate.

The group of cookies, often called 'analytics cookies', are used to gather this information. The information collected is grouped with the information from everyone else's cookies. We can then see the overall patterns of usage rather than any one person's activity. Analytics cookies are used to improve how an application, a website and its pages work.

Our applications, web locations, websites and communications you get from us contain small invisible images known as 'web beacons' or 'pixels'. These are used to manage the interaction between you and the online information or email and allow us to access the effectiveness of the communications.

### ***Affiliate Cookies***

We use 'affiliate' cookies. Some of our web-based information will contain promotional links to other companies' sites. If you follow one of these links and then register with or buy something from that other site, a cookie is used to tell the other site that you came from one of our sites. That other site may then pay us a small amount for the successful referral. For more, see the [Internet Advertising Bureau's](#) for information on how affiliate marketing works. Note that when you visit those companies' sites, they will have their own privacy notices which set out what personal data they collect and how they will use it.

## **SHOWING YOU ADVERTISING AND MARKETING THAT IS RELEVANT TO YOUR INTERESTS**

Our advertising and marketing partners use cookies and similar technologies to:

- Tailor to your interests the adverts and content you see on our own and third-party sites and apps.
- Limit the number of times you see the same advert or content.
- Measure the effectiveness of adverts and content you're shown, including where and how often they're shown and any action you took in relation to them.

The information our partners collect and share through these cookies does not directly identify you. It does not include your name or address or personal contact details like your email address or phone number. Instead they collect and share your IP address, online identifiers such as device IDs, and information about your browser habits which can be used to make inferences about your interests.

When you access [zybre.co.uk](http://zybre.co.uk) or our ZYBRE sites and apps for the first time you will be asked to set your preferences for the use of these cookies on those sites and apps. After that you can use the **Privacy Options** link (e.g. in the site footer) to manage those preferences. There you can also find out more information about our partners. If you turn

these cookies off you will still see adverts, but they are less likely to be of interest to you. Please note that you are not yet able to set your preferences for all our advertising and marketing partners. We will be adding the remainder and when we do, we will ask you to set your preferences again.

## **COOKIES EXPLAINED**

If you want to know about data collected by third parties when you click on their adverts, you should check their privacy notices to find out what they collect, how they process it and what they use it for.

It's easy to choose not to receive behavioural advertising and manage your cookies, if you want to.

## **CONTROLLING MY COOKIES**

### ***How can I see and manage my cookies in my browser?***

Virtually all modern browsers allow you to see what cookies you've got, and to clear them individually or clear all of them. To find out how to do this, go to [aboutcookies.org](https://aboutcookies.org), which contains comprehensive information on how to do this on a wide variety of desktop browsers.

When you access [zybre.co.uk](https://zybre.co.uk) or our ZYBRE sites and apps for the first time you will be asked to set your preferences for the use of these cookies on those sites and apps. After that you can use the **Privacy Options** link (e.g. in the site footer) to manage those preferences. There you can also find out more information about our partners. If you turn these cookies off you will still see adverts, but they are less likely to be of interest to you. Please note that you are not yet able to set your preferences for all our advertising and marketing partners. We will be adding the remainder and when we do, we will ask you to set your preferences again.

### ***How can I choose not to receive Online Behavioural Advertising and other tracking cookies?***

In addition to the controls available on your computer, there are other ways of choosing not to receive Online Behavioural Advertising and other tracking cookies.

Please note that most of these choices work by setting a cookie that overrides the behavioural advertising cookie. If you clear all cookies, you will also clear these opt-out cookies, therefore changing your preferences. In this instance you would need to choose again.

### ***Organisations which provide more information on Online Behavioural Advertising***

- [Evidon](#) is a provider of privacy solutions.
- [Internet Advertising Bureau \(IAB\)](#) "Your Online Choices" page allows you to choose not to receive behavioural advertising from each of the advertising networks represented by the IAB.
- [Network Advertising Initiative \(NAI\)](#) opt out page allows you to choose not to receive behavioural advertising from each of the ad networks represented by the NAI.
- [Digital Advertising Alliance's](#) self-regulatory program for online behavioural advertising choices page.

## **HOW LONG WE KEEP YOUR INFORMATION**

In this section, we explain the categories of personal data that we may keep, the periods applied and our reasons for keeping them.

These categories of data include customer contact information, the addresses where we have provided services, account, activation, account correspondence with notes and complaints, payment card and financial history. We keep this information for business, legal and regulatory purposes. Some of the legal reasons why we keep this data are: tax purposes, to enable us to defend potential legal claims under the statutory periods set out in the Limitation Act 1980. We will also need to keep some information to demonstrate compliance with the Data Protection Act



2018, for example, where we need to evidence compliance with suppression requests. This information is also helpful if we receive customer enquiries or complaints, and to verify your identity when you contact ZYBRE.

These records are retained securely for 7 years after your account is cancelled. After this time they will either be securely deleted or anonymised.

Some categories of data are deleted sooner where the data is no longer needed for the purposes for which it was collected (such as where we have recorded calls, these are retained for 12 months). Please read the **Keeping your data up to date and your rights** section above to understand how to get in touch to discuss a right to erasure request.

Please note that you are able to take some actions to delete your data in your My ZYBRE account.

## **COMPLAINTS**

If you wish to make a complaint about how we use your information, please contact us via My ZYBRE on [zybre.co.uk](https://zybre.co.uk) or on 0330 320 2062 or by emailing [hello@zybre.co.uk](mailto:hello@zybre.co.uk) and we will do our best to help. You may also find our Customer Complaints Code of Practice helpful. If you're still unhappy, you can contact the Information Commissioner's Office via their [website](#).

## **CONTACTING ZYBRE**

If you have any queries or comments about this privacy and cookies notice, please write to Customer Relations, ZYBRE Limited, 20-22 Wenlock Road, London, N1 7GU or contact ZYBRE's Data Protection Officer via [hello@zybre.co.uk](mailto:hello@zybre.co.uk).

## **CHANGES TO THIS NOTICE**

We will occasionally update our privacy and cookies notice. We will post a notice of any material changes on our website prior to implementing the changes, and, where appropriate, notify you using any of the contact details we hold for you for this purpose. This may include phone, SMS, e-mail, post or interactive social media. We encourage you to periodically review our notice to be informed of how we use your information.

**This privacy and cookies notice was last updated 01 July 2021.**