



## UNARO LIMITED - PRIVACY NOTICE

### INTRODUCTION AND DEFINITIONS

Unaro Limited ("**we**", "**our**" and "**us**") is committed to protecting and respecting your privacy.

This notice sets out the basis on which any personal data, which we collect about you, that you provide to us or that we have received from a third party source, will be processed by us.

If you have questions about correcting or deleting your personal data please refer to sections 3 and 8 below.

References in this notice to "**data protection law**" mean (as applicable) the Data Protection Act 1998, the General Data Protection Regulation (Regulation (EU) 2016/679) and all related data protection legislation having effect in the United Kingdom from time to time.

References in this notice to "**data**" or "**information**" include "**sensitive personal data**" and "**special categories of data**" (as defined under data protection law) where applicable.

### 1 OUR DETAILS

1.1 The data controller with conduct of your personal information is Unaro Limited of 6 Brookvale Road, Southampton, England, SO17 1QL

1.2 Our data protection officer is Nathan Adlard who may be contacted at the above address [-or at info@unaro.co.uk](mailto:info@unaro.co.uk)

### 2 HOW WE USE YOUR INFORMATION

2.1 The following sections explain what information we hold about you, why we are processing that information, the legal basis for the processing, the duration for which we keep your information and (if applicable) who your information will be shared with and where those recipients are based.

#### **Which information do we process and for what purpose?**

2.2 **Service Users.** We manage access to public wifi hotspots provided to end users on behalf of our customers ("Service Users"). This section relates to information we process about you if you are a Service User. We process the following personal information about Service Users:

2.2.1 **Information you give us.** We process the information that you provide to us on the captive portal page that you are required to complete in order to gain access to one of the public WiFi networks that we manage. This information will include your first name, last name, email address, gender and date of birth..

2.2.2 **Information we collect about you.** This is information that we collect about your use of the WiFi networks that we manage. We do not currently capture any information about your usage of the Wifi networks that we manage.

2.3 **Suppliers and business partners.** If you work for one of our suppliers, customers or other business partners then we may process the following personal information about you:

2.3.1.1 your name, work email address, work phone numbers and work address

2.3.1.2 Information contained in and records of communications between us, including letter, emails and recordings of telephone calls.

2.3.1.3 If you are a sole trader, then we may also process your bank account details for the purposes of invoicing you or paying your invoices.

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**2.4 Purposes.** We process your information for the following purposes:<sup>4</sup>

2.4.1 If you are a Service User:

2.4.1.1 to manage your access to WiFi hotspots provided by our business customers;

2.4.1.2 to provide a dashboard for our customers with aggregate anonymised information about the usage made of their hotspot by Service Users;

2.4.1.3 to carry out our obligations arising from any contracts entered into between us and our business customers that provide WiFi hotspots;

2.4.1.4 if you consent, to send you promotional emails about products and services that we think may be of interest to you. Gender and age information may be used to make marketing emails more relevant to you.

2.4.2 If you are a customer, supplier or business partner:

2.4.2.1 to carry out our obligations arising from any contracts entered into between us and you;

2.4.2.2 to manage and administer any other arrangements between you and us (or one or more of our affiliates);

2.4.2.3 to notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that you submit to us;

2.4.2.4 to invoice you and to manage your account with us;

2.4.2.5 if you are an existing customer, to notify you about changes to our products and services, and our latest offers;

2.4.2.6 to provide you with support in relation to our services;

2.4.2.7 if you are a supplier to place orders with you and to manage our relationship with you as a supplier of goods or services; and

2.4.2.8 to keep financial records relating to our business and to comply with our legal obligations.

### **What are the grounds for processing your information?**

2.5 We are processing your data on the following grounds:

2.5.1 you have consented to the processing for one of the purposes stated in section 2.4, above (this may apply where you have agreed to receive marketing emails about our promotions and product changes).

2.5.2 if you are a customer who is an individual, because it is necessary for the performance of the contract between you and us. This includes where you have instructed us to take some pre-contractual steps prior to us formalising the contract.

2.5.3 the processing is necessary for us to comply with our legal obligations, such as our obligations to keep accounting records and tax records.

2.5.4 the processing is necessary for pursuing our legitimate interest of operating our business of providing cloud based secure document storage, management and sharing services, improving our products and services and promoting the business. Where this ground is applicable, in accordance with data protection law, we have carefully



weighed your interests and fundamental rights and freedoms against our

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interest to process your information and are satisfied that we are justified in processing your information for this purpose.

### **Duration and further processing**

- 2.6 We only keep your information for so long as it is reasonably necessary. When setting our data retention periods, we consider the amount, nature, and sensitivity of the information we hold, the potential risk of harm from unauthorised use or disclosure of the information and the purposes for which we process the information (including whether we can achieve those purposes by other means). We also take into account our other legal obligations to keep or securely dispose of personal information.
- 2.7 We keep data about Service Users for 7 years from the date on which they access a WiFi network. We keep information about customers for 7 years after our relationship with them has ended, unless there are grounds to keep such information for longer.

### **Who is your information shared with?**

- 2.8 Unless you have provided your consent, we will not share your personal data with third parties for marketing purposes. We may share your information with selected third parties including the following:
- 2.8.1 We use third parties to carry out certain activities on our behalf that involve the processing of personal information. For example, we may engage third party service providers to provide online hosting services to host our platform, to host our router software, and to assist with software development. We currently use Google Cloud to host our platform. If you have consented to receiving marketing communications, we may also pass your email address to an external email campaign services provider to send you promotional emails. We currently use MailChimp to provide this service. These third parties have access to personal information needed to perform their functions, but may not use it for other purposes.
- 2.8.2 We may pass personal information to external agencies and organisations (including the police and other law enforcement agencies) for the purpose of preventing and detecting fraud (including fraudulent transactions) and criminal activity. These external agencies may check the information we give them against public and private databases and may keep a record of such checks to use in future security checks. We may also disclose personal information to the police and other law enforcement authorities in connection with the prevention and detection of crime.
- 2.8.3 We may pass personal information to our insurers in the event that a claim is made or could be made against us.
- 2.8.4 In the event that we sell or buy any business or assets, we may disclose personal information held by us about our customers to the prospective seller or buyer of such business or assets. If we or substantially all of our assets are acquired by a third party (or subject to a reorganisation within our corporate group), personal information held by us about our customers will be one of the transferred assets.
- 2.8.5 We may pass your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation (including in connection with a court order), or in order to enforce or apply our terms of use or other agreements we have with or otherwise concerning you (including agreements between you and us (or one or more of our affiliates)); or to protect our rights, property or safety or those of our customers, employees or other third parties.

2.8.6 [Your](#) information will not be transferred outside of the European Economic Area or to any country which is not approved by the European Commission. If this changes, then we will let you know

#### **Automated decision making**

2.9 We do not make automated decisions about you based on your information. 3

### **YOUR RIGHTS**

3.1 Under data protection law you have the following rights:

3.1.1 if we are processing your data on the basis of your consent then you have the right to withdraw that consent at any time. Consent can be withdrawn by notifying us using the details set out in section 8 below. The lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent

3.1.2 the right to access a copy of your information which we hold. This is called a 'subject access request'. Additional details on how to exercise this right are set out in section 5, below;

3.1.3 the right to prevent us processing your information for direct 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 contacting us using the details set out in section 8, below;

3.1.4 the right to object to decisions being made about you by automated means. We will inform you if your information is subject to automated processing;

3.1.5 the right to object to us processing your personal information in certain other situations;

3.1.6 the right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate;

3.1.7 the right, in certain circumstances, to claim compensation for damages caused by us breaching data protection law;

3.1.8 the right to request that we erase, rectify, cease processing and/or delete your information; and

3.1.9 in certain circumstances, the right to request the information we hold on you in a machine readable format so that you can transfer it to other services. This right is called 'data portability'. Additional details on how to exercise this right are set out in section 5, below.

3.2 You also have the general right to complain to us (in the first instance) and to the Information Commissioner's Office (if you are not satisfied by our response) if you have any concerns about how we hold and process your information. Our contact details are set out in section 8, below. The Information Commissioner's Office website is [www.ico.org.uk](http://www.ico.org.uk).

3.3 For further information on your rights under data protection law and how to exercise them, you can contact Citizens Advice Bureau ([www.citizensadvice.org.uk](http://www.citizensadvice.org.uk)) or the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

### **4 COOKIES**

4.1 Cookies are small text files that we transfer to your computer's hard drive through your web



browser to enable our systems to recognize your browser and help us to track visitors to the WiFi Hotspots that we manage. We use the following cookies:

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4.1.1 cookies to manage user log-ins;

4.1.2 Google Analytics cookies

4.1.3 Cookies for Wordpress blog comments<sup>2</sup>

## 5 ACCESS TO INFORMATION

5.1 Under data protection law you can exercise your right of access by making a written request to receive copies of some of the information we hold on you. You must send us proof of your identity, or proof of authority if making the request on behalf of someone else, before we can supply the information to you. Requests should be sent to us using the contact details below.

5.2 If you are requesting copies of documents you already possess, we may charge our reasonable administrative costs. We will also be allowed to charge you for our reasonable administrative costs in collating and providing you with details of the requested information which we hold about you if your request is clearly unfounded or excessive. In very limited circumstances, we are also entitled to refuse to comply with your request if it is particularly onerous; and

5.3 In certain circumstances, you are entitled to receive the information in a structured, commonly used and machine readable form.

## 6 DATA SECURITY

We will always store your digital information on secure servers. Unfortunately, however, the transmission of information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of your information transmitted to our site or otherwise to our servers (such as by email). Any such transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 7 CHANGES TO OUR PRIVACY NOTICE

This notice was last updated in May 2020. Any material changes we may make to our privacy notice in the future will be uploaded to our website. We will notify you of any major changes by email. Please check back frequently to see any updates or changes to our privacy notice.

## 8 CONTACT

Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to [Nathan Adlard](#), Data Protection Officer, [6, Brookvale Road, Southampton SO17 1QL](#) or by email [addressed to Nathan Adlard. Data Protection Officer at info@unaro.co.uk](mailto:addressed to Nathan Adlard. Data Protection Officer at info@unaro.co.uk).