

# Privacy and Cookie Policy

## 1. ABOUT US

Legend Communications Limited (“Legend”) is a full fibre internet service provider (“ISP”). We are a limited company registered in England and Wales under company number 12559962 and our registered office and main trading address is at Pickering House, 40a Park Place, Leeds, LS1 2ED. Our VAT number is GB346601312. We’re regulated in the UK by Ofcom, the UK communications regulator. Legend Fibre is a Registered Trademark and a service trading name of Legend Communications Limited.

Legend is the controller and responsible for your personal data.

Legend is committed to protecting and respecting your privacy. Our Privacy and Cookie Policy (“Privacy Policy”) lets you know how we collect and use your personal data and tells you about your privacy rights. When we refer to “personal data” in this Privacy Policy, we mean information which can identify you as an individual. It is important that you read this Privacy Policy so that you are fully aware of how and why we are using your data.

By (i) registering or placing an order at [www.Legend.com](http://www.Legend.com) (our “Website”), or (ii) placing an order for our services by calling our customer service agents (“Customer Support”) or (iii) submitting a paper order form to us or (iv) giving us your details to record your registered interest in becoming our customer in the future or (v) giving us your details for us to contact you in relation to our services or business development or (vi) giving us or consenting for us to use your details for you to manage (as a third party) the account or billing arrangements for a Legend customer, you agree to the collection and use of your information under the terms of this Privacy Policy. If you do not agree to the data practices set out in this Privacy Policy, we will not be able provide you with our services.

## 2. INFORMATION WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

**Identity Data** includes first name, last name, username or similar identifier, title, date of birth, gender and any other personal information we receive to show that you are eligible to order or receive our services.

**Contact Data** includes billing address, delivery address, email address, social media username (if given) and telephone numbers.

**Financial Data** includes bank account and payment card details.

**Transaction Data** includes details of payments made by you, any equipment we will supply, and services you have subscribed to.

**Usage Data** includes information about how you use our services, our network and our Website.

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website

and our network.

**Profile Data** includes your username and password (if made available to us), orders made by you, your interests, preferences, feedback and survey responses.

**Accessibility Data** includes information about any disability, health condition, vulnerability or accessibility issue (whether temporary or long-term) that affect how you use our services or how we need to communicate with you.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share "Aggregated Data" (this means statistical or demographic data derived from your personal data). Aggregated Data is not considered personal data in law as this data does not directly or indirectly reveal your identity.

### 3. HOW WE COLLECT YOUR PERSONAL DATA

#### **Identity Data, Contact Data and Financial Data**

You may give us your Identity, Contact, Financial and Accessibility Data by corresponding with us by via our Website, systems or communicating with our Customer Support online, by email, on the telephone or by post. This includes personal data you provide when you:

- fill in paper forms or online forms on our Website
- register to use our Website
- record your registered interest in becoming our customer in the future
- give us your details for us to contact you in relation to our services
- post any material on our Website
- place an order for our services by telephone
- request any additional services or upgrades
- ask for help or advice or report a problem with our services
- request marketing communications to be sent to you
- enter a competition, promotion or survey
- give us feedback

This also includes information you enter even when you only partially fill out an online form, and exit before completing it.

When you contact us (by phone, email or via our Website), we may keep a record of it and what you say to us. This will include details of any Accessibility Data or other health data that you share with us (for example, when ordering services or arranging for installation or service visits) when you contact us.

We may also hold your Identity, Contact and Financial Data for you to manage a Legend customer's account or billing arrangements (at that customer's or your request).

When you order services from us, we may make enquiries about you for credit reference purposes. These enquires include searching your records held by any credit reference agencies or any fraud prevention scheme. Where we receive information about you from them, we'll always protect it in accordance with this Privacy Policy and keep it secure.

### **Transaction Data**

We will collect and hold details of orders you make through our Website, by telephone or on paper forms and details of any payments you have made and any products/equipment supplied – e.g. routers.

### **Usage and Technical Data**

When you use our services, we will automatically collect your Usage Data. When you (or someone using your Legend broadband service) use Legend's network to make a telephone call or connect to the internet, we keep a record of that call (including the number called) so we can 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. We will also collect 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.

If a customer abuses our internet service or any other services we provide, for example by not following any part of our Acceptable Usage Policy, we may keep any information relating to that abuse.

### **Profile Data**

We automatically collect Technical Data about your visits to our Website (including, but not limited to, traffic data, location data, weblogs and other communication data) and the websites and other products and services you access through it. We collect this personal data by using cookies, server logs and other similar technologies. Please see the Cookie Policy section below for more information about how we use cookies and how to change your browser settings to refuse some or all cookies.

We will also collect information on which devices have accessed your Hyperhub router (eg. type of device, brand, model, operating system and browser) in order to monitor and better understand how our services are used.

We may collect information about your computer, including your IP address, operating system and browser type, to help keep our network running smoothly. Unless this information is needed for a service enquiry specific to your service, this is used as aggregated statistical information about our users' browsing actions and patterns, and does not identify any individual.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them. We may ask you questions, from time to time, about how you use the services we provide, other services you would like us to provide in the future and about other things, such as information about your lifestyle.

### **Marketing and Communications Data**

We will keep a record of whether you have opted out of receiving marketing from us. We will also keep a record of your communication preferences.

## **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a contract we are about to enter into or have entered into with you
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation

**Performance of Contract** means using your data as necessary for us to provide a quote to you or fulfil a contract to provide our services to you.

**Legitimate Interest** means using your data as necessary for the commercial interests of our business, allowing us to conduct and manage our business to give you the best possible service and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

**Comply with a legal or regulatory obligation** means using your personal data to the extent necessary for us to comply with a legal or regulatory obligation that we are subject to.

We have set out below a description of the ways we use your personal data. Note that we may use your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful ground for processing
To register you as a new customer	(a) Identity (b) Contact (c) Usage Perform our contract with you	Perform our contract with you
To process your order and provide our services including: (a) Making the services available to you and performing any necessary installation work (b) To take account of accessibility requirements and support vulnerable customers (c) Managing payments and charges (d) Providing billing	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Accessibility (f) Usage (g) Marketing and Communications	(a) Perform our contract with you  (b) Necessary for our legitimate interests (to recover debts due to us)  (c) Necessary to comply with our legal obligations (to support customers with accessibility requirements or who are vulnerable)

<p>information to you (e) Collecting and recovering money owed to us</p>		
<p>To monitor your usage of our services and maintain records of your usage (including provide billing information to you)</p>	<p>(a) Identity (b) Contact (c) Usage (d) Technical (e) Accessibility</p>	<p>(a) Perform our contract with you (b) Necessary for our legitimate interests (for training and quality purposes) (c) Necessary to comply with our legal obligations (to support customers with accessibility requirements or who are vulnerable)</p>
<p>To manage our ongoing relationship with you which will include:</p> <p>(a) Maintaining your account (b) Responding to any questions (c) Notifying you about changes to our services (d) Notifying you about changes to our terms or privacy policy (e) Asking you to leave a review or complete a feedback survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Marketing and Communications</p>	<p>(a) Perform our contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated, maintain and develop our service provision and to understand how customers use our services)</p>
<p>To administer and protect our business, network and Website (including troubleshooting, data analysis, testing, system maintenance, support,</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a</p>

reporting and hosting of data)		business reorganisation or group restructuring exercise)  (b) Necessary to comply with our legal obligations
To deliver relevant Website content and advertisements in the most effective manner to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website, services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To enable you to manage (as a third party) the account or billing arrangements of a Hyperoptic customer, either at the customer's or your request.	(a) Identity (b) Contact (c) Financial	(a) To perform our contract with the customer on whose behalf you are acting (b) Necessary to comply with our regulatory obligations to allow a third party to manage the billing arrangements for a customer with special accessibility requirements

## Accessibility Data

You may choose to provide us with details relating to a disability, health condition, vulnerability or accessibility issue (whether temporary or long-term) that affects how we provide our services to you, how you use our services or how we need to communicate with you. If you provide any such details, we will keep them secure and only use them to the extent necessary to ensure that we are able to provide our services to you, we treat you fairly and we give you any additional support that you need to communicate with us and access our services.

### **Marketing Communications**

If you are a customer, we may also use your Identity, Contact, Technical, Usage, Profile and Marketing and Communications Data to form a view on what services and offers may be relevant for you and to send you recommendations about services and offers that we think may be of interest or to invite you to participate in prize draws or competitions (“marketing communications”).

If you have given us your details to record your registered interest in becoming our customer in the future or for us to contact you in relation to our services or business development (including to receive our newsletter), we may use your Identity Data to keep you up to date about our services and coverage.

You will only receive marketing communications from us if you have registered an interest in receiving our services (whether current services or in the future when your building or location is connected to our network), requested information from us in relation to our services or purchased services from us and, in each case, you have not opted out of receiving that marketing.

You can ask us to stop sending you marketing communications at any time by logging into My Account via our Website and checking or unchecking relevant boxes to adjust your marketing preferences, by following the opt-out links on any marketing message sent to you or by contacting us at any time.

If you opt out of receiving marketing communications, we will still send you service-related communications as necessary.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

### **Our partners**

We may sometimes need to share your personal data with the types of third party listed below:

- Our partner organisations and subcontractors who provide some of the services on our behalf
- Credit reference agencies (to carry out credit checks) and debt recovery agencies (if you do not pay your bills)
- Analytics and search engine providers that assist us in the improvement and optimisation of our Website
- IT and system administration services service providers

- Professional advisers including lawyers, auditors and insurers
- Third parties to whom we may choose to sell, transfer or merge parts of our business with

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Other providers we work with**

We may from time to time work with other service providers (such as Sky UK Limited) who offer content and other services which are complementary to our services. We may ask you if you would like us to share your details with these third parties so that you can receive their services. We will tell you what details we need to share and will only ever provide your details to these types of third party if you have specifically agreed that you want us to.

If you have agreed to us sharing your details in this way, the third party service provider will act as a data controller in respect of your details that we share with them and their use of your details will be subject to their own privacy notices and policies. Please note that we do not recommend or endorse any third party services and it is your responsibility to make sure that you obtain all necessary information to decide whether or not you want to receive such third party services.

### **Your nominated third parties**

If, as a Legend customer, you have nominated a third party to manage your Legend account or billing arrangements, you agree that this may involve that third party having access to and being able to make changes to your Legend account details and/or billing arrangements (as applicable) either through Legend's website or by contacting Customer Support. We accept no responsibility in relation to you choosing a third party to manage your account or billing arrangements or in relation to their use or misuse of such of your personal information to which they have access under these arrangements.

### **Legal obligations**

We may also disclose your personal data to a third party if we are under a duty to do so in order to comply with a legal obligation or in order to enforce or apply our terms of use. This includes exchanging information with other companies and organisations for the purposes of law enforcement, fraud protection and credit risk reduction.

## **6. INTERNATIONAL TRANSFERS**

We share your personal data within Legend's organisation which involves transferring your data outside the European Economic Area (EEA). We ensure your personal data is protected by requiring all our divisions to follow the same rules when processing your personal data to ensure its security. These rules are called "model clauses".

In addition, some of our third party suppliers are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

1. The third party country has been deemed to provide an adequate level of protection for personal data by the European Commission; or
2. The service provider has provided adequate safeguards to ensure that individuals rights are enforceable and legal remedies are available.

## 7. DATA SECURITY

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We also have in place procedures to deal with any suspected personal data breach and will notify you and the ICO (the UK supervisory authority) of a breach where we are legally required to do so.

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 you have chosen) a customer ID, password(s) or log-ins to allow you to access certain parts of our Website, you are responsible for keeping these confidential. You are responsible for how our services are used from your account and for keeping your account information secret. Please keep this information safe, and do not share it with others.

Unfortunately, sending information using the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of the data you send to our Website; you take the risk for this. Once we have received your information, we will try our best to keep it secure. This includes using strict procedures and security features to try to prevent unauthorised access.

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and others associated with us. If you follow a link to any of these websites, please note that these websites have their own privacy and cookie policies. Legend accepts no responsibility or liability for these policies. Please check these policies before you send any personal data to these websites.

## 8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for at least 7 years after they cease being customers for tax purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

You have various rights in relation to your personal data – these are set out in detail below. If you wish to exercise any of these rights, please email us: [dataprotection@legendfibre.com](mailto:dataprotection@legendfibre.com)

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete your personal data when we no longer need it. You may also ask us to delete your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with a legal obligation. However, we may not be able to comply with your request of erasure, for example, if we are required to retain your personal data for legal reasons. We will let you know if this is the case.

**Object to processing** of your personal data where we are processing your personal data for direct marketing purposes. You also have the right to object where we are relying on a legitimate interest but you feel the processing impacts on your fundamental rights and freedoms.

**Request restriction** of processing of your personal data. You may ask us to suspend the processing of your personal data in the following scenarios: (a) if you do not think the data we hold is accurate, whilst we verify its accuracy; (b) where our use of the data is

unlawful but you do not want us to erase it; (c) where we no longer need to process it but you require us to store it in relation to a legal claim; or (d) if you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will if feasible practically provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to information which we process by automated means and use to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal data (for example, for marketing purposes). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

You will not have to pay a fee to access your personal data or to exercise any of your other rights. However, if we feel that your request is unfounded, repetitive or excessive, we may charge a reasonable fee or we may let you know that we are refusing to comply with your request. If we refuse your request, we will explain why and you will be entitled to raise the issue with the ICO.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or to exercise any of your other rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We will respond to all legitimate requests within 30 days of receipt and, if possible, achieve a satisfactory resolution within that time period. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. CHANGES TO THIS PRIVACY POLICY

Any changes we may make to this Privacy Policy in the future will be posted on this page. You should check this page from time to time for any changes we made. We may also email you about these changes, if you are a customer of Legend.

## 11. CONTACT

If you have any questions, comments and requests regarding this Privacy Policy, including any requests to exercise any of your legal rights under it, please contact us using the details set out below.

Email: [dataprotection@legendfibre.com](mailto:dataprotection@legendfibre.com)

Post: The Legend Building, 173 Sunbridge Road, Bradford, BD1 2HB

If you have any complaint about how we are using your personal data or otherwise in relation to this Privacy Policy, please contact us in the first instance and will we do our best

to resolve it. If we do not resolve it to your satisfaction, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

## COOKIE POLICY

Our Website uses cookies – these are small files of letters and numbers which we store on your browser or the device you use to access our Website.

### 1. HOW WE USE COOKIES

We use essential cookies to make our Website work.

We'd also like to set analytics and marketing cookies. Analytics cookies help us improve our Website and make it work more efficiently. Marketing cookies allow us to recognise you when you return to our Website and personalise the offers we show you. These cookies are optional – we won't set any analytics or marketing cookies unless you agree to them.

**Essential cookies:** These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website to order our services and to access your account details.

**Analytics cookies:** These allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily. We use Google Analytics and Hotjar to track use of our Website and our users' needs. All information collected for these purposes and shared with our analytics providers is anonymous or collected in such a way that users cannot be identified from this data. This information allows us to improve our Website and our services, for example, to measure the effectiveness or success of our advertising campaigns and products. For more information about Google Analytics, please see their privacy policy at: [www.google.com/policies/privacy](http://www.google.com/policies/privacy).

**Marketing cookies:** We use cookies to place adverts about Legend products on other websites and social media and manage referrals from those websites to our Website. If you follow a link from another website then purchase our services, we may use cookies to tell the other website that you have made a purchase. Or if you click on a link to an advert, video or social media channel on our Website, we may use cookies to gather statistics about this.

### 2. WHAT COOKIES DO WE USE?

We use these cookies on our Website:

Function	Purpose	Cookies	First or Third party	Expiry
Technical operation of the Website - essential	These cookies are essential for the technical operation of the Website and to personalise Website content.	PHPSESSID MY-RATINGS orderNowPackage ho_cookie_policy layout productDetailsShown px_random _gid	First First First First First First First First	Session 1 year 30 mins 2 years 1 year 60 mins 2 years 24 hours
Session management - essential	These cookies are essential for session management for the Website.	AWSELB AWSELBCORS AWSELB	Third Third First	30 mins 1 min 30 mins
Live chat - analytics	This cookie enables live chat via the Website.	__zlcmid	First	1 year
Website feedback - analytics	This cookie allows users to send feedback via the Website.	usbIs	First	Session
Website use - analytics	These cookies allow us to see how visitors are using the Website. We use this information to help us	_ga _gid px_random _hjid _hjAbsoluteSessionInProgress _hjIncludedInSample	First First First First First First	2 years 24 hours 2 years 1 year 30 mins 30 mins

	improve the quality of the Website and give users a better browsing experience. We also use this information to measure the effectiveness of our advertising campaigns.	_dc_gtm_UA-23479045-1 _gat_gtag_UA_133598323_1 _gat_UA-23479045-1 JSESSIONID	First First First First	1 min 1 min 1 min Session
Social media -advertising	These cookies enable advertising to be shown across social media channels (including LinkedIn, Facebook, Snapchat and Twitter). They provide our social media partners with information about how the Website is used.	lang fr _sctr _fbp _scid bcookie lang li_sugr lissc lidc UserMatchHistory personalization_id bscookie X-AB	Third Third First First First Third Third Third Third Third Third Third Third Third Third	Session 90 days 1 day 90 days 1 year 2 years Session 90 days 1 year 1 day 30 days 2 years 2 years 1 day
Online targeting - advertising	These cookies are used by us and our advertising partners (including Google and BING) to build	MUID IDE _gcl_au _uetvid _uetsid	Third Third First First First	390 days 2 years 90 days 16 days 1 day

	a profile of website users' interests and to show relevant marketing.			
Tracking affiliate referrals - advertising	This cookie tracks referrals to use from affiliated websites - this helps us to understand how our customers have reached the Website.	aw5737 aw6515	Third Third	1 month 1 month

### 3. HOW TO MANAGE YOUR COOKIE SETTINGS

You can edit your cookie settings by clicking "Manage Cookies" at the bottom of each page on our Website and then "Edit cookie settings". You can then adjust the available sliders for optional cookies to "On" or "Off", then click "Save" to save your cookie settings.

Additionally, most web browsers allow you to control cookies through the browser settings. If you want to stop cookies being stored on your computer, you should check your browser instructions by clicking "Help" in your browser menu. However, if you block all cookies (including essential cookies), this may affect how our Website functions and you may not be able to access all or certain parts of our Website.

If you want to delete any cookies that are already on your computer, you should check the instructions for your file management software to locate the file or directory that stores cookies. There is also information in the "Manage Cookies" section on our Website about how to clear cookies using certain browsers.

For more information about deleting and controlling cookies visit [www.youronlinechoices.com](http://www.youronlinechoices.com) or [www.aboutcookies.org](http://www.aboutcookies.org).

#### **RECRUITMENT PRIVACY NOTICE**

[Recruitment Privacy Notice – Legend Coomunications Limited](#)

#### **DATE**

This Policy is effective from 16 May 2021.