



## Who are We?

Danish Telecom operate within the UK, where Danish Telecom is one of the most competitive communication services providers to the residential and business markets, supplying a wide range of communications products and services, including voice, data, internet and multimedia services, and offering a comprehensive range of managed and packaged communications solutions.

Danish Telecom provides a range of products and services, including communications, networked IT and consultancy services to address the needs of major corporations, governments and multi-site global organisations. When we refer to "we" or "our" or "Danish Telecom" we are referring to Danish Telecom and its subsidiaries, or any of them, as the context requires.

## Why do we have a Privacy Policy?

We have developed this policy because we want you to feel confident about the privacy and security of your personal information. Danish Telecom is registered under the data protection laws in the United Kingdom and takes all reasonable care to prevent any unauthorised access to your personal information.

When we refer to "personal information" in this privacy policy, we mean information, which identifies you as an individual, or is capable of doing so. Accordingly, we may hold and use data about you in your capacity as a consumer, a business customer, as an individual acting on behalf of a business customer, as a shareholder, or in any other capacity, for example, when you visit our websites.

Please read this privacy policy carefully. If you are visiting any of our websites or using any of our services, by continuing to do so, you indicate your agreement to our use of your personal information as set out in this privacy policy.

## What does this privacy policy cover?

This privacy policy only applies to how Danish Telecom deals with your personal information. It does not apply to any other company or to any other company's websites even if you access them through Danish Telecom. If you disclose your personal information to other companies your information will be dealt with according to their privacy practices.

# What personal information do we collect about you, and when do we collect it?

We may ask you for information to enable us to provide a service to you and we collect this information by telephone, written correspondence or via a website. We may ask you for information including your name, private/business address, contact telephone numbers and email address. We may also ask you for other information that relates to the service you are using or ordering. For example, we may need your credit card number to charge you for certain services

- 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 world wide web, we keep a record of that call (including the number called) to enable Danish Telecom to charge for it. We also receive from other operators information about calls made over our network, where we need that information for connecting and billing purposes.
- If someone abuses or damages the telephone network, for example by making offensive or nuisance calls, we may keep information relating to that abuse.
- We have information about your use of our services (such as the amount of time you spend on-line), which we use to manage our network, and for billing. We may also use this information for marketing products and services but we will give the option to opt out of receiving this material.
- If you enter into any of our competitions or promotions, we may ask for information about you, which will be made clear at the time you enter. We will also inform you of the purposes for which the information you provide may be used.
- We may ask you from time to time about what use you make of the services we provide, what other services you would like us to provide in the future, and for other information, such as lifestyle data.
- We collect information from visitors to our websites to help us to make improvements to the websites and to the services we make available. We know, for instance, how many visitors there are to each website, when they visited, for how long and to which areas of our website they went. We may share this information with our advertisers and to other companies which offer their goods or services on our websites. It helps to show these organisations how effective our websites are as sales channels for their products. You or any other individual cannot be identified from the information we share as the data is aggregated and anonymised.
- We may also monitor and record our communications with you, including e-mails and phone conversations. Information which we collect may then be used for training purposes, quality assurance, to record details about the products and services you order from us, and in order to meet our legal and regulatory obligations generally

## We do not use this information to:

- analyse your visits to any other websites (except that we do track you if you go to websites carrying our banner, but we do not identify personal details while we do this)

## What personal information do we collect about you from other companies and organisations?

- We may receive personal information about you from other companies and organisations (for example, for marketing purposes) and we rely on these third parties to obtain your consent for us to use this information.
- We receive information from other telecommunications operators about their customers to enable us to enter their details (together with our own customer's information) in telephone directories. We also make telephone numbers available on directory enquiry services unless customers (Danish Telecom or other licensed telecommunications operators) have chosen to be ex-directory.

Credit checking and account management 1. Please note that when you order goods and services from Danish Telecom 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 (CRA) and checking any details held on you) Security alert or other Fraud Prevention Agencies (FPAs). When CRAs receive a search from us they will place a footprint on your file that may be seen by other organisations. At all times where your information is disclosed to us we may retain it and we will protect it in accordance with this policy and keep it secure. We will retain the outcome of searches we carry out with CRAs to avoid having to make repeat searches against your credit file in circumstances where we may need to carry out further credit checks in respect of additional products or services ordered by you. We will only retain this data for a reasonable period.

2. We will carry out checks while assessing your application for telephone service and will verify your identity. We do this to help protect you from identity theft and fraud, and also to prevent and detect crime and money laundering. We may also make periodic searches at CRAs and FPAs to manage your account with us.

3. If you tell us that you have a spouse or financial associate, we will link your records together so you must be sure that you have their agreement to disclose information about them. CRAs also link your records together and these links will remain on your and their files until such time as you or your partner successfully files for a disassociation with the CRAs to break that link.

4. Information on applications will be sent to CRAs and will be recorded by them. We may also give them details of your accounts and billing information, including how you

manage it/them to CRAs We may tell them about payments you make to us, your account balances, and payment defaults [We may also give them historical information we hold about your payment history with us.] If you do not pay your bills on time, CRAs will record this information and it may be supplied to other organisations by CRAs and FPAs to perform similar checks and to trace your whereabouts and recover debts that you owe to them as well as us.

How to find out more You can contact the CRAs currently operating in the UK; the information they hold may not be the same so it is worth contacting them all. They will charge you a small statutory fee.

Callcredit, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ or call 0870 0601414 or log on to ;[www.callcredit.co.uk](http://www.callcredit.co.uk)

Equifax PLC, Credit File Advice Centre, PO Box1140, Bradford, BD1 5US or call 0844 3350550 or log on to ;[www.equifax.co.uk](http://www.equifax.co.uk)

Experian, Consumer Help Service, PO Box 8000, Nottingham NG80 7WF or call 0844 4818000 or log on to ;[www.experian.co.uk](http://www.experian.co.uk)

Do we share your personal information with anyone else? As a normal part of our business we share with other communications companies information for connecting and charging for calls over each others networks.

We sometimes use other companies to provide services to you or to provide services to us. To enable them to do this, we may need to share your personal information with them. When we do so, these companies are required to act in accordance with the instructions we give them and they must meet the requirements of the Data Protection Act to keep the information secure.

We may share your personal information with other parts of Danish Telecom to enable them to conduct their own businesses and to market their products and services to you. We provide this information in accordance with our code of practice on the disclosure of customer information. This code limits Danish Telecom's ability to share information in this manner and is intended to prevent Danish Telecom gaining unfair competitive advantage over its competitors.

We may share your personal information with other companies so that they can contact you with details of other products or services you may be interested in. We will only do this if you have agreed to this and where the companies agree to use your personal information for that purpose only. If you have agreed to receive information about products and services from another company and later decide not to you will need to contact that company yourself to let them know. You can of course ask us not to continue to provide your personal information to any more companies in future.

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 Data Protection Act. We also provide information 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.

If there is a change (or prospective change) in the ownership of Danish Telecom or any of its assets, we may disclose personal information to the new (or prospective) owner. If we do so, we will require them to keep it confidential. If you believe the personal information we hold on you is incorrect you may amend it by following the procedure set out below in "How can I change the personal information Danish Telecom holds about me?"

For how long does Danish Telecom keep personal information? The time period for which we keep information varies according to what the information is used for. In some cases, there are legal requirements to keep data for a minimum period. Unless there is a specific legal requirement for us to keep the information, we will retain it for no longer than is necessary for the purposes for which the data was collected or for which it is to be further processed.

How do we protect your data when it is transferred out of Europe? Countries in the European Economic Area (EEA) are required to have a similar standard of protection of personal data but this is not always the case in countries outside of the EEA. We do sometimes transfer data outside the EEA but before doing so take steps to ensure that your data will be given adequate protection as required by the Data Protection Act.

How can I find out what personal information Danish Telecom holds about me?

If you want specific information ie.:-

- copies of fault reports
- copy invoices

then you must contact Customer Services. If you are asking for a full subject access request then put your request in writing, enclosing a cheque for 10 made payable to Danish Telecom plc and send to our headquarters.

You will also need to provide the following information so that we can process your request:

- The relevant account number/s
- The relevant telephone number/s

- The relevant address/s
- The date and time if requesting a call recording? (see also note below)

If you have any information such as reference numbers, dates and times of contact then please include them in your request.

(Danish Telecom does record some calls for Quality and Training purposes, however, not all calls are recorded. Calls are only held for a short period of time. If you want a call recording it is essential that you provide the information requested above, otherwise we will not be able to proceed with your request). Once we have all the relevant information we will process your request within the 40 day time limit allowed under the terms of The Data Protection Act.

How can I change the personal information Danish Telecom holds about me? If the information we hold about you is inaccurate, please let us know and we will make the necessary amendments and confirm that these have been made.

How can I manage Danish Telecom's contact with me for marketing purposes? You may choose not to receive marketing information from Danish Telecom and, if you are already receiving such information from us, you can ask us to stop at any time. If you would like Danish Telecom not to call or mail you with details of products, services and special offers, please call 0800 915 9396 (residential customers) (business customers) or contact your Account Manager on the same number. If you would like to stop unsolicited telemarketing calls from other companies, please contact the Telephone Preference Service on 0845 0700707 or do this online at [www.tpsonline.org.uk](http://www.tpsonline.org.uk) and register your telephone number(s). Direct marketing calls should stop after 28 days. If you would like to stop unsolicited direct marketing mailings from other companies, please contact the Mail Preference Service on 0345 034599 or do this online at [www.mpsonline.org.uk](http://www.mpsonline.org.uk). Direct marketing mailers should stop or significantly reduce after 3 months. (Remember to re-register if you change your address).

How do we protect your personal information? We are serious about guarding the security of your personal information and the details of any transactions made. We take appropriate organisational and technical security measures to protect your data against unauthorised disclosure or processing. We use a secure server to store the information you give us when you register or make an order (including your credit card details and your password). Any personal data you send us on-line is securely encrypted.

Please note that your billing account number is a sensitive piece of information, which can be used with your telephone number to find out information about your use of Danish Telecom's services. Please be sure to keep this information safe, and do not share it with others. For access to information such as itemised billing and some business account and ordering services, extra proof of identity and authorisation may be needed.

# How do you find out about changes to our privacy policy?

We may change our privacy policy from time to time. New policies will be published on our web sites.

Does Danish Telecom's privacy policy protect me when I use Danish Telecom's websites? Danish Telecom's privacy policy also applies to information collected when you use any of our websites.

You do not have to register to access most of our websites. However, if you provide information via the "contact us" or any of the other interactive features, you indicate your consent to our use of your personal data in the manner described in this privacy policy. If you do register on one of our websites, we may ask you to provide personal details such as name, address, e-mail address, telephone number and, where appropriate, Danish Telecom account number. We also ask you to choose a password, and to complete a password security question and answer, in case you forget your password for any reason.

Once you have registered on one of our websites, we may keep a record of your use of any of the services made available via that particular website. (Please see "When does Danish Telecom use cookies" below for more information on how we do this).

If you choose not to register with us and only browse our websites, we may gather information to help make your visit to our website more satisfying. However, this information will not identify you personally. (Please see "When does Danish Telecom use cookies" below for more information on how we do this).

If you do not wish to register, you will still be able to use and order some of the services offered via our websites. We will only ask you to provide such information as necessary to enable us to carry out the transaction in question. We will not use that information for any other purpose. You should note that some services are only available if you register on the website first.

If you have registered for any of the services available through our websites you may choose to cancel that registration at any time. You can do this in one of two ways:

- return to the original registration page and following the instructions for cancelling the registration; or
- send an e-mail to us by completing the feedback form

Please ensure you inform us of the service which you wish to cancel.

If you do either of these, your personal details will be deleted from our website database.

If you have registered you have direct control over information in your personal profile on our website. You can access and change this information at any time by using the "Update your profile" link.

Over and above what Danish Telecom does to safeguard your privacy and security online, there are a number of things you can do to protect yourself from Internet fraud:

Choose a password (letters and digits) you can remember but others will not guess, change it regularly and, if you do write it down, keep it somewhere safe and secure. When you have finished your session on our website, make sure you prevent your details being seen by anyone that you do not wish to see them. So, if you have registered and logged in, remember to log off.

Clear any cache so there is no record of any transactions left on screen - both Netscape and Internet Explorer let you do this.

We also recommend you then close your browser so any history of the session is cleared. As an extra precaution, your session on bt.com will time out if you have not used the site for 30 minutes.

We collect information from visitors to our websites to help us to make improvements to the websites and to the services we make available. We know, for instance, how many visitors there are to each website, when they visited, for how long and to which areas of our website they went. We may share this information with our advertisers and to other companies which offer their goods or services on our websites. It helps to show these organisations how effective our websites are as sales channels for their products. You or any other individual cannot be identified from the information we share as the data is aggregated and anonymised.

We do not use this information to:

analyse your visits to any other websites (except that we do track you if you go to websites carrying our banner, but we do not identify personal details while we do this);  
or

When do we use cookies and how do we get your consent?

What are cookies? A "cookie" is a text file containing small amounts of information which a server downloads to your personal computer (PC) or mobile when you visit a website. The server then sends a cookie back to the originating website each time you subsequently visit it, or if you visit another website which recognises that cookie.

There are different types of cookies which are used to do different things, such as letting you navigate between different pages on a website efficiently, remembering preferences you have given a website, and improving your overall experience. Others are used to provide you with advertising which is more tailored to your interests, or to measure the number of site visits and the most popular pages users visit.

Some cookies are allocated to your PC only for the duration of your visit to a website, and these are called session based cookies. These automatically expire when you close down your browser.

Another type of cookie known as a "persistent". These cookies would remain on your PC for a period of time.

What are the new rules? Website operators already have to give users information about the cookies they use and why they use them. Now they also have to have your consent to use them.

In order to comply with these new rules, we have developed a system of classifying the different types of cookies which we use on Danish Telecom.com, or which may be dropped by third parties through our websites. This system of classification is based on the purpose the cookies are used for, and also determines the way we will ask for your

consent to use them. The classification explains more about which cookies we use, why we use them, and the functionality you will lose if you decide you don't want to have them on your PC. We have also designed a series of icons which represent the different categories of cookies, and these icons link through to a more detailed description of those cookies and their purpose. The icons are shown on a 'sliding scale' which you can use to adjust your choices about the types of cookies which you agree to have on your PC at any time as the tool bar which displays these icons is always visible on the footer on all the pages you view on Danish Telecom.com.

**How we ask for your consent** When you visit Danish Telecom.com for the first time after we introduced these icons we will show you a notice which tells you that we use cookies, why we use them, and how you can change which cookies you chose to accept using the sliding scale toolbar and clicking on the icons. If you enter Danish Telecom.com having seen this notice without making any changes to the existing cookie settings we have provided we will take this as your agreement to those settings as we have told you about them and we assume you are happy with them. If you change the settings using the icons on the sliding scale, you are giving your consent to use those which you have not disabled.

However, one of the categories of cookies which we have identified is those which are 'strictly necessary' to enable us to provide you with any service which you have requested from us to be delivered online. We do not need to ask for your consent to use these, as we would not be able to provide the service you had asked for without them.

A further category of cookies which we have identified we have called 'Performance cookies' and we use these only to improve our site or measure response rates. All information collected by these cookies is anonymous and does not in any way impact on your privacy. We need to use them to maintain our site's effectiveness and ease of use, so we have not provided an opportunity for these to be disabled, and by using our site and online services you are agreeing that we can place these types of cookies on your PC.

**Using the sliding scale and icons** You can access the cookie classification and icons wherever the 'cookie preferences' tool bar appears. To make your choices, just slide the bar to the icon which represents a type of cookie based on its function. If you click on the icon you will see a detailed description of the type of cookie represented by that icon, why we want to use them, and what would happen if you don't chose to accept them. We also give a list of the individual cookies we use in each category in the 'more about cookies' section, so that if you check your internet settings, you know what these are if you have agreed we can use them.

**Browser settings** In addition to using the icons, cookies can also be removed from your PC using browser settings but there will still be some deterioration in the service you receive (for example, you may receive many pop up boxes containing the same advertisements or you may not be able to access a page you earlier personalised).

Your browser lets you choose whether to accept, not to accept or to be warned before accepting cookies. These can be found in the advanced preferences.

Further information The categorisation and icons are also used in a 'cookie code' developed by the International Chamber of Commerce (ICC) for use by website operators to comply with the new rules. There is also more information to be found on [www.allaboutcookies.org](http://www.allaboutcookies.org).

## Are third party sites covered by this policy?

Third party Internet sites that you can link to from Danish Telecom's websites are not covered by our privacy policy, so we urge you to be careful when you enter any personal information online. Danish Telecom accepts no responsibility or liability for these sites. Other companies which advertise or offer their products or services on our website may also allocate cookies to your PC. The types of cookies they use and how they use the information generated by them will be governed by their own privacy policies and not ours.