



Principle  
networks

# Information Security Governance Framework: Privacy Policy

**Principle Networks**

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## Principle Networks Privacy Policy

Principle Networks Ltd takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Personal Data (via our website or through the services we provide) which we handle and sets out how we intend to ensure the highest standard of care in towards personal data.

### Definitions and interpretation

In this privacy policy, the following definitions are used:

**Data** – collectively all information that we handle whether provided you, or partners or generated by us. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;

**Cookies** – a small text file placed on your computer by our Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by the Website are set out in the clause below (Cookies);

**Data Protection Laws** – any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK, as well as the Data Protection Act 2018

**GDPR** – the General Data Protection Regulation (EU) 2016/679;

**Principle Networks Ltd, we or us** – Principle Networks Ltd, a company incorporated in England and Wales with registered number 11341216 whose registered office is at Sapper Jordan Rossi Park, Otley Road, Baildon, BD17 7AX;

**UK and EU Cookie Law** – the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;

In this privacy policy, unless the context requires a different interpretation:

- the singular includes the plural and vice versa;
- references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
- a reference to a person includes firms, companies, government entities, trusts and partnerships;
- “including” is understood to mean “including without limitation”;
- reference to any statutory provision includes any modification or amendment of it;
- the headings and sub-headings do not form part of this privacy policy.

## Scope of this privacy policy

This privacy policy applies to all processing activities undertaken by Principle Networks either as a Data Controller or a Data Processor.

Depending on the nature of the relationship we have with you we will either be acting as a Data Controller, where we determine the means and purpose of the processing, or as a Data Processor, where we are only processing on your instruction.

## Data collected

We may collect the following information, which includes Personal Data, from you:

- Name;
- Contact Information such as email addresses and telephone numbers;
- Contact preferences;
- Browsing data such as IP addresses, online identifiers and cookies.

## How we collect Data

We collect Data in the following ways:

- Data is given to us by you;
- Data is shared with us by our partners; and,
- Data is collected automatically.

We will always let you know, prior to the processing commencing, if you are under a contractual or statutory requirement to provide us with your personal data.

## Data that is given to us by you

Principle Networks Ltd will collect your Data in a number of ways, for example, when you contact us through the Website, by telephone, post, e-mail or through any other means and in each case, in accordance with this privacy policy.

## Data is shared with us by our partners

Where we have a contractual relationship with a company for the delivery of our services, we will sometimes require personal data relating to its employees to be shared with for the purpose of delivering our service. This could include sharing with us the contact details of a specific person within the business who we need to get in touch with.

## Data that is collected automatically

To the extent that you access the Website, we will collect your Data automatically, for example:

- we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
- we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".

## Our use of Data

There are a number of reasons why we may process your data, and these include but are not limited to:

- delivering our services and products to you,
- optimising our website for the best browsing experience possible; and,
- promoting our organisation and everything it has to offer, to you.

We may use your Data for the above purposes where we have a legitimate interest in doing so, such as growing our business and providing you with the best experience we can. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed “Your rights” below).

We will also use your Data where this a contractual agreement between us and the processing is necessary for us to fulfil it.

Where we deliver direct marketing materials to you, we will always ensure that you have not previously asked us not to, whether by telephone, text or email. You can ask us to stop sending you these materials at any time and we will oblige, in line with the Privacy and Electronic Communications Regulations.

We do not currently carry out any profiling or automated decision-making but if we do start employing these measures we will ensure that you are informed about it.

### **Who we share Data with**

We may share your Data with our employees, agents and/or professional advisors, and generally any sub-processors we may employ to get in touch about relevant services or to deliver our services as per a contract we are party to.

We will never share data internationally without first ensuring that all of the appropriate safeguards are in place. In line with this we will require that at least one of the following is satisfied:

- The territory into which the data are being transferred is one approved by the ICO;
- The territory into which the data are being transferred has an adequacy decision issued by the European Commission;
- The transfer is made under the unaltered terms of the standard contractual clauses issued by the European Commission for such purposes;
- The transfer is made under the provision of binding corporate rules which have been approved and certified by the European Commission;
- The transfer is made in accordance with an exception set out in the Data Protection Laws.

### **Keeping Data secure**

We will use technical and organisational measures to safeguard your Data, for example password protection using unique credentials and only using secure servers to store your data. As a preliminary step in securing your data we have obtained a Cyber Essentials Certification.

Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: [russell.crowley@principle-networks.com](mailto:russell.crowley@principle-networks.com).

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## Data retention

Unless a longer retention period is required by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy.

Where you have asked us to delete your data it may persist on backup or archival media for legal, tax or regulatory purposes.

## Your rights

You have the following rights in relation to your Data:

**Right to access**– the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information, we hold about you, we will not charge you for this, unless your request is “manifestly unfounded or excessive.” Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

**Right to correct**– the right to have your Data rectified if it is inaccurate or incomplete.

**Right to erase**– the right to request that we delete or remove your Data from our systems.

**Right to restrict our use of your Data**– the right to “block” us from using your Data or limit the way in which we can use it.

**Right to data portability**– the right to request that we move, copy or transfer your Data.

**Right to object**– the right to object to our use of your Data including where we use it for our legitimate interests.

To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: [russel.crowley@principle-networks.com](mailto:russel.crowley@principle-networks.com).

If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner’s Office (ICO). The ICO’s contact details can be found on their website at <https://ico.org.uk/>.

It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

## Links to other websites

Our Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

## Changes of business ownership and control

Principle Networks Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Principle Networks Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.

We may also disclose Data to a prospective purchaser of our business or any part of it.

In the above instances, we will take steps with the aim of ensuring your privacy is protected.

## Cookies

Our Website may place and access certain Cookies on your computer. Principle Networks Ltd uses Cookies to improve your experience of using the Website and to improve our range of services. Principle Networks Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Principle Networks Ltd to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

This Website may place the following Cookies:

Type of Cookie	Purpose
Strictly necessary 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, use a shopping cart or make use of e-billing services.
Analytical/performance cookies	They 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.

Below is a list of the cookies that we use. We have tried to ensure this is complete and up to date, but if you think that we have missed a cookie or there is any discrepancy, please let us know.

We use the following strictly necessary cookies:

Description of Cookie	Purpose
cookie_notice_accepted	We use this session cookie to remember you and maintain your session whilst you are using our website.

You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

You can choose to delete Cookies at any time; however, you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.

It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](https://www.aboutcookies.org). You will also find details on how to delete cookies from your computer.

### **General**

You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.

Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

### **Changes to this privacy policy**

Principle Networks Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations. You may contact Principle Networks Ltd by email at [enquiries@principle-networks.com](mailto:enquiries@principle-networks.com)

## Document Control and Approval

Document Control	
Document Title	Privacy Policy
Document Author(s)	Principle Networks Ltd
Date Originated	06/04/2022
Status	Authorised
Version	1.3

This Privacy Policy can be viewed by accessing <https://principle-networks.com/privacy-policy/>

### Approval

Name: Russell Crowley

Position: Director

Signature: 

Date: April 6, 2022