

# Privacy Policy

Effective date: May 25, 2018

EASY WI-FI LIMITED ("us", "we", or "our") operates WiFi internet service on behalf of this venue (hereinafter referred to as the "Service").

This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

## Definitions

- Service - Service is WiFi internet service operated by EASY WI-FI LIMITED on behalf of the venue owner, operator or tenant.
- Personal Data - Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).
- Usage Data - Usage Data is data collected automatically either generated using the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- Cookies - Cookies are small files stored on your device (computer or mobile device).
- Data Controller
- Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.
- For this Privacy Policy, we are a Data Controller of your Personal Data.
- Data Processors (or Service Providers)
- Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.
- We may use the services of various Service Providers to process your data more effectively.
- Data Subject (or User)

- Data Subject is any living individual who is using our Service and is the subject of Personal Data.

Where we are acting as the data processor for the controller (Usually the venue owner who we are providing the service on behalf of) we will give access to your personal data for marketing purposes where you have explicitly given permission to do so at the time of registration. You have the right to withdraw your consent at any time.

To withdraw your consent, you can email or post the request to us or use our online subscriber portal to update your preferences. You should also contact the venue owner to have your details removed from their records.

## **Information Collection and Use**

We collect several different types of information for various purposes to provide and improve our Service to you.

### **Types of Data Collected**

#### **Personal Data**

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Title (Ms, Mrs, Mr, Miss)
- Full name
- Email Address
- Phone Number
- Age Range
- Gender
- Date of Birth
- Local or Visitor (To the venue)
- Country of Origin
- Custom data fields, I.e. user type is casual

#### **Usage Data**

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include the following:

- Device Media Access Control ("MAC") Address
- Device Host Name
- Device IP Address
- Access Point Locations
- Access Times and Dates
- Data Usage (Volumes)

#### **Tracking & Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

## Use of Data

EASY WI-FI LIMITED uses the collected data for various purposes:

- To provide and maintain our Service
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To send marketing information (if consent given at time of registration)

## Legal Basis for Processing Personal Data under the General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), EASY WI-FI LIMITED legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

EASY WI-FI LIMITED may process your Personal Data because:

- We need to perform a contract with you
- You have given us permission to do so (Consent)
- The processing is in our legitimate interests and it is not overridden by your rights
- To comply with the law (communications data retention)

## Retention of Data

EASY WI-FI LIMITED will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

EASY WI-FI LIMITED will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods (We will retain usage data for a minimum period of 12 months for communications data retention).

## Transfer of Data

Your information, including Personal Data, will be retained within the EEA. Where we are collecting data or sharing it with the venue owner you will need to refer to their policy for data transfer and storage.

If you are located outside United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

EASY WI-FI LIMITED will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

## Venue Details

Where you have given consent for us to share your data with you will need to contact them using the details below to make data requests. If you have used our self-service portal to disable marketing/sharing consent, then you should contact the venue owner to make sure they have removed or updated any older personal data they may hold.

- Venue Name;
- Venue Email;
- Venue Phone;

## Third Party Services

The venue owner may use direct integrations with marketing or CRM services. If integration is enabled from our platform the services will be listed below.

The venue may have provided additional privacy information which can be found at the bottom of this page under "Additional Information".

## Disclosure of Data

### Disclosure for Law Enforcement

Under certain circumstances, EASY WI-FI LIMITED may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

## Legal Requirements

EASY WI-FI LIMITED may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of EASY WI-FI LIMITED
- To prevent or investigate possible wrongdoing in connection with the Service
- To protect the personal safety of users of the Service or the public
- To protect against legal liability

## Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

EASY WI-FI LIMITED will always ensure that data transferred to and from our service platform is encrypted using TLS and any storage of your personal data will be on encrypted storage to help protect your personal data.

## **Your Data Protection Rights under the General Data Protection Regulation (GDPR)**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. EASY WI-FI LIMITED aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems (where the data is not retained for legal purposes), please contact us or use our online subscriber portal.

In certain circumstances, you have the following data protection rights:

- The right to access, update or delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where EASY WI-FI LIMITED relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

EASY WI-FI LIMITED are registered with the ICO.

### **Service Providers**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **Analytics**

We may use third-party Service Providers to monitor and analyse the use of our Service. These analytics could be connected to google accounts managed by the venue owner.

- Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

## **Children's Privacy**

If you are under 16 years old you should get permission from a parent or guardian before submitting personal data.

If you are a parent or guardian and you are aware that your Child has provided us with Personal Data without permission to do so, please contact us. If we become aware that we have collected Personal Data from children without parental consent, we take steps to remove that information from our servers.

Most of our services use family friendly web content filtering however these services do not catch all inappropriate material and where we are not in control of the network or VPNs are in use, we cannot guarantee filtering. Please always make sure you are aware of your child's activities particularly on public networks.

## **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

By email: [info@easy-wifi.co.uk](mailto:info@easy-wifi.co.uk)

By visiting this page on our website: <https://portal.easy-wifi.co.uk/subscriber>

By mail: Maylands Business Center, Redbourn Road, Hemel Hempstead, Herts, HP2 7ES