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## NEUTRAL WIRELESS PRIVACY NOTICE

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### INTRODUCTION:

Neutral Wireless understands that your privacy is important to you and that you care about how your personal data is used. We respect the privacy of all personal information we collect from individuals in the course of our business and will only collect and use personal data in ways that are described in this Privacy Notice, and in a way that is consistent with our obligations and your rights under the law.

By providing your personal information as described in this Privacy Notice, or by proceeding with your visit to the Neutral Wireless website, you are accepting and consenting to the practices described in this Privacy Notice, and you agree to the transfer, storing or processing of your personal information in the manner described in this Privacy Notice.

Our website may contain links to other websites run by other organisations. This Privacy Notice applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We do not accept any responsibility or liability for the privacy policies and practices of other websites even if you access those using links from our website.

'You', 'your', 'user', and other similar terms refers to any person who provides their personal information to either a company or an individual working for Neutral Wireless.

'We', 'us', 'our', refers to Neutral Wireless.

### 1. **Information About Us**

Neutral Wireless Limited,

A company established and registered under Scots Law with company number SC615351.

Registered address: 1<sup>st</sup> Floor, 9 George Square, Glasgow, Scotland, G2 1DY

### 2. **What Does This Notice Cover?**

This Privacy Notice explains how we handle personal information collected from persons who use the Neutral Wireless website, or who, following an invitation from Neutral Wireless in the course of any marketing and /or event communication processes, such as in-person, email, telephone, text messaging direct mail, and online, provide personal information to Neutral Wireless. It also explains your rights under the law relating to your personal data.

### 3. **What Is Personal Data?**

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

#### 4. **What Are Your Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves so please contact us in the first instance, using the details in Part 11.

#### 5. **How And What Type of Data Do We Collect From You?**

We may collect, hold, and process some or all the personal data about you from the following sources:

- a) Website: When you visit the Neutral Wireless website, we collect personal information about your visit. Our web server automatically records details about your visit (for example, your IP address, the type of browser used, the Neutral Wireless website pages that you visit and the duration of your visit). In addition, we collect the personal details which you provide online, for example, when you enter personal details (e.g. name, gender, address, email address, phone

number) on a website registration page.

- b) Directly From You: We also collect personal information directly from you in the course of (i) sales or purchasing activities; and/or (ii) in connection with marketing events, for instance: business cards; personal contact details; emails; and other social media; and/or (iii) job applications where we collect, store and use information you provide on your application form(s) for the purpose of recruitment.
- c) Third Party Sources: In some circumstances we may also collect personal information about you from third parties, such as your employer, or professional organisations to which you belong, or personal information that you have placed in the public domain, such as from Facebook or LinkedIn.

## 6. **How Do We Use Your Personal Data?**

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. We will use personal information that you have given us, and/or we have collected about you and/or we have received from other sources, for the following purposes:

- a) We may use your contact information and preferences to send you newsletters that we may circulate from time to time, news about any events we are organising or participating in, information about us, the products and/or services that we provide, and/or to respond to any user enquiries. You will always have the opportunity to opt-out of receiving such information from us;
- b) Supplying our products and/or services that you have ordered;
- c) In the course of running our business we may use your data to: (i) do the things that are necessary for running our services and business; (ii) help secure our business and prevent fraud; (iii) create reports for internal or external purposes; (iv) comply with the legal and regulatory obligations that apply to us; (v) audit our business and processes; (vi) protect the interests of our business, and those of our partners; (vii) help assess any assets we may buy or sell;
- d) Improving and tailoring our products and/or services to you;
- e) Managing payments for our products and/or services;
- f) Recruitment.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

## 7. **How Long Will We Keep Your Personal Data?**

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations, as well as best practice.

For example, we are legally required to hold some types of information to fulfil our

statutory and regulatory obligations (e.g. tax/accounting purposes).

Further reasons we may retain personal information include for our auditing purposes, evidence in defence of a legal claim, ensuring you are suppressed from marketing if you prefer never to hear from us in the future.

We review our retention periods on a regular basis.

## 8. **How and Where Do We Store or Transfer Your Personal Data?**

We store some of your personal data on servers located in data centres within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. In addition, we also store some of your personal data on servers located in data centres within the United States. This means that your personal data will be fully protected under the EU GDPR and/or to equivalent standards by law. Transfers of personal data to the EEA and the US from the UK are permitted without additional safeguards.

Please contact us using the details below in Part 11 for further information about the particular data protection safeguards used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where we are legally required to do so.

## 9. **Do We Share Your Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions.

If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Notice.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any personal data is transferred outside of the UK, we will take suitable steps to ensure that your personal data is treated as safely and securely as it would be within the UK and under the Data Protection Legislation, as explained above in Part 8.

## 10. **How Can You Access Your Personal Data?**

If you require us to correct or delete or restrict the processing of any of your personal information that is inaccurate or that you no longer want us to hold you can notify us using the contact details in Part 11.

Should you want to know what personal data we have about you, you may, where permitted by GDPR, ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

**11. How Do You Contact Us?**

To contact our Data Protection Officer about anything to do with your personal data and data protection, including to make a subject access request, please use the following details.

- Email address: [DPO@neutralwireless.com](mailto:DPO@neutralwireless.com).
- Postal address: Data Protection Officer, Neutral Wireless Ltd, 1<sup>st</sup> Floor, 9 George Square, Glasgow, Scotland, G2 1DY.

**12. Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website so please check this page occasionally to ensure that you are happy with any changes. If we make any significant changes, we will make this clear on our website. This Privacy Notice was last updated on 12 February 2024.