



brsk Limited
Company Number: 12792126

85 Great Portland Street
First Floor
London
W1W 7LT

Brsk Privacy Policy

1. Introduction

Welcome to the Brsk Privacy Policy. At Brsk Limited (“we”, “us” or “our”) we are committed to ensuring your personal privacy is protected and that our legal obligations are met in this regard.

We use your personal data to provide and improve our products and services to our customers (“you”, “your”), and to manage our network in the right way.

This Privacy Policy describes our policies and procedures on the collection, use and disclosure of your information when you use our website, when we interact with you and when you use our products or services. This policy also informs our employees of their obligations when processing your data.

2. What Data We Collect

2.1. Information we collect directly from you. You may give us your personal information (name, address, email address, phone number, date of birth) and your financial information (credit/debit card details, bank account number) by interacting with us via our website, customer support desk, by email, on the telephone, by post or in a direct face to face engagement. For example, when you:

- Complete any forms on our website to record your interest for our products and services.
- Record your interest through face-to-face engagement, for us to contact you about our products and services in the future.
- Get in touch with us to ask a question or get support.
- When you place an order to purchase a service to become a Brsk customer.
- Enter any competition or promotions we have on offer.
- Make changes to your user account profile.
- Use our networks.
- Apply for a job with us.
- Complete a customer survey or provide feedback through various channels.

2.2. Information we collect about you when you use our products or services.

When you use our products or services, we will automatically collect data from you including the following:

- Usage data.
- Billing, payment and transactional data.
- Device data related to IP addresses, device manufacturers, browser information and similar information required from your devices to communicate with websites and applications on the internet.



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- To monitor and record interactions and communications with you to improve our customer service.
- To keep a record of whether you have opted into receiving marketing from us.

2.3. Information collected from others. In addition to collecting information directly from you, we may collect information about you and the use of our services from third parties. This may include:

- Financial and transactional data from providers of technical and payment services.
- Data we collect from members of your household in relation to the use of our service.
- Data we receive from someone who refers you for the use of our services.
- Data from other organizations who have obtained your permission to share information about you with us.
- Data accessible from publicly available sources.
- Information we get about you from reporting agencies, such as credit agencies.

3. How We Use Your Personal Data

There are a number of justifiable reasons under the GDPR that allow the collection and processing of personal data. We will process your personal data in the following situations:

3.1. In order to perform our contractual obligations. In order to perform our obligations under a contract, we will need to process your personal information. Examples of these situations include:

- To process your order and register you as a new customer.
- To provide you with a quote for our services.
- To respond to any queries you might have regarding our services.
- To manage and operate the existing services that you have with us.
- To contact you in relation to your account.
- To monitor your usage of our services and maintain records of your usage.
- To provide you with information relating to our services.

3.2. In order to comply with any legal or regulatory obligation. We may need to provide your personal information to any regulator in any competent jurisdiction, to the extent that we need to comply with a legal or regulatory obligation that we are subject to.

3.3. Legitimate interest. We may need to use your data as necessary for the commercial interests of our business, as can reasonably be expected for the running of our business and in order to provide the best possible service. We will ensure we do not override your fundamental rights, freedoms and interests.



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3.4. Consent to marketing and new content communication. If you are our customer, we may use your identity and related information to send you recommendations about future services or promotions that we reasonably believe will be of interest to you. This includes where you have given us your information by registering your interest in receiving future information about our products and services. You have the right to ask us to stop sending you information at any time, and it does not affect the lawfulness of processing carried out before your request to withdraw.

4. Who Do We Share Your Information With

We may be required to share your information with third parties or partners in compliance with the applicable data protection laws for the purposes as set out in clause 3. Where we share your information, we require those third parties to respect your personal information in accordance with the law, and they are specifically required to use your information in line with our instructions. They are not allowed to use your information for their own purposes.

The types of third parties we may need to share your information may include:

- Our build, installation and maintenance partners who provide services on our behalf.
- Credit reference agencies where we may either share information (about how you pay your bills) or receive information (about how you conduct paying your bills with others) in order for us to carry out credit checks and assess your ability to make regular payments for our products and services.
- Debt recovery agencies who will follow up with you if you do not pay your bills.
- Professional advisors including lawyers, auditors and insurers.
- Payment processors who run our billing and payment collections.
- Third parties who we may choose to sell, transfer or merge our business with.
- Customer service agencies to run surveys so we can improve our services.

We do not sell or share your personal information to third party marketing services.

5. Sharing Your Data Outside of the UK

We share your personal information within the Brsk organization, this may involve us transferring or storing this information outside of the UK. We will only do this on the basis that anyone that we share with follows the same rules of protecting your personal information.

Similarly, some of our third-party suppliers are based outside of the UK and so their processing of your personal information will involve a transfer outside of the UK. In the event that we transfer your information outside of the UK, we will ensure that a similar degree of protection is in place.



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6. Protecting Your Data

The security of your information is important to us. We have appropriate measures in place in order to protect and ensure it does not get lost, stolen or used in an unauthorized way.

Sending information over the internet is not always secure and we cannot guarantee the security of the personal information that you transmit to us using the internet or online methods.

7. Retention of your Personal Information

When you use our products or services we create records of your information. These records can be stored as physical or digital records. The length of time we keep these records depends on the type of information and the purpose. For example, we are required to keep basic information about our customers for tax purposes for up to 7 years after they cancel with us. We may also be required to keep information to sort out disagreements, or prove you had an account with us. We will only keep the information for as long as we may need it.

8. Your Rights

You have a number of rights in relation to the data we collect from you; these include:

- Your right to request the information we have about you, called the Subject Access Request (SAR). To make a valid request, you can email us at dataprotection@brsk.co.uk or write to us at our company address which is published on our website.
- Your right to withdraw your consent for us to use your data, where we are relying on that consent.
- Your right to update your personal information if we have it as being inaccurate or incomplete.
- Your right to ask us to remove or delete your information in certain circumstances. In some circumstances we are legally required to retain it.
- Your right to object to the processing of your personal information in certain circumstances, for example where we are processing your information for direct marketing purposes.
- Your right to complain to the Information Commissioner's Office www.ico.org.uk if you think that any of your rights have been infringed by us.

With respect to all requests, please contact us at dataprotection@brsk.co.uk, or write to us at the address on the home page of our website. We will respond within 30 days of



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receipt and attempt to resolve the matter with that time. Should we be unable to meet this deadline, we will keep you updated through to resolution.

9. Cookies

We use cookies on our website. A cookie is a piece of data stored in a file that is sent between web pages. Cookies are used to identify if you have visited our site before, and some will be saved on your computer by your web browser. Cookies are anonymous and do not store any kind of personal information.

Some of our cookies are essential and others improve your experience on our website and to recommend content that may be of interest to you. When you visit our website we will ask whether you agree to use our cookies.

9.1. Cookies we use

- 9.1.1. Essential cookies – required for the operation of our website. For example cookies that enable you to log into secure areas of our website. Without these cookies this information would be lost every time you visit a new page.
- 9.1.2. Analytical and performance cookies – used to count the number of visits to our website, see how many return visitors there are, how long they stay around, and what they are using it for. This helps us improve the way our website works. The information collected and shared with our analytic providers is anonymous, users are not able to be identified from this data.
- 9.1.3. Advertising cookies – used to record visits to our website, the pages you have visited and the links you have followed to other websites. We will use this information to make our website more relevant to you. We may decide to share this information with others, within brsk, or to selected third parties for this purpose.

9.2. Third Party Cookies. Third party cookies are set by another organizations or businesses to that of the website you are visiting, for example google and other advertising networks providers of external services like web traffic analysis services and content recommendation engines, will set their own cookie to perform this service. These third-party cookies are likely to be analytical/performance cookies or targeting cookies.

9.3. How to turn Cookies off. You can manage and change the cookie settings on your web browser. This will allow you to block or refuse some or all of the cookies. Check your browser's help section. If you do block or refuse cookies, you may not be able to access all sections of our website.



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10. Last Updated

We keep our policy under review and will place updates on our website. This policy was last updated on 14th July 2021.