

# **Data Protection Policy**

To enable us to provide the high quality services we do, we have to hold potentially sensitive information about our customers.

We take the privacy of our customers and their data very seriously. This document will explain what data we hold and for what reason.

By trading with 999 Network Services, you are agreeing to this policy.

# 1.) Customer Database

Our customer database holds the names, addresses, phone numbers, and email addresses of our current and past customers. It may also hold details of how we were introduced and any previously shared passwords required to support the customer's equipment. Access to this database is for 999 Network Services staff only and access is encrypted with SSL.

## 2.) Remote Access

Remote access is required for supporting PCs over the internet. We currently use software called Connectwise. This is hosted on 999 Network Services dedicated servers. Connectwise remote access sessions are secured with Advanced Encryption Standard (AES) 256 bit encryption. Updates are released periodically for security reasons and additional features. These updates are automatically pushed out to customers systems in the background when they are available.

Access to customers PC by 999 Network Services staff is by invite/request only. Some customers may also be given access to their own PCs by previous agreement.

### 3.) Telephone Answering Service

During busy times, we will redirect our inbound office and support numbers to an external call answering service supplied by "MyRuby". They are fully UK based and calls are answered in Colchester. They hold a database of names and telephone numbers that are used just to process the calls and messages that are passed on to us.

## 4.) Accounts

Customer contact details as well as current and previous billing details are held to enable us to trade.

These details are stored by our accounts system provider "Xero" and is hosted directly with them. Access is only available to 999 Network Services staff over an SSL encrypted connection and is protected with two factor authentication. Xero support may also be granted short term access by 999 staff while diagnosing a problem with the system.

We do not store customer bank details for payments received by standing order or BACs.

Cheques received do contain potentially sensitive banking details although these are forwarded to our bank and copies are not kept.

Debit and Credit card payments are processed for us by "Stripe". Full card details are never made available to 999 Network Services staff.

### 5.) Website

No personal information is collected on/by our website unless voluntarily entered into the "contact us" or "newsletter" sign up forms. Subscribers can opt-out from newsletters at any time via the same form or my contacting us.

## 6.) Email Newsletters

We hold a database of previously opted in names and email addresses for the purposes of emailing the very occasional newsletter. To remove your details from this database, please follow the details at the bottom of any newsletter or contact us. We never purchase lists of email addresses from 3<sup>rd</sup> party companies or sell our databases.

### 7.) Working on Customers PC

We may have access to personal information while working on your PC(s). This data will never be shared with any others and copies will never be taken unless previously agreed.

### 8.) Hard Drive Images

During data recovery from customer's hard drives (or other data storage media) we may need to store a temporary "image" of this data on our servers. This data is not used for any other purpose and copies are deleted once the data has been recovered and returned to the customer.

### 9.) Email Encryption

Email access by 999 Network Services staff to our email servers are always protected by SSL encryption. External emails passing in and out of our email systems will also be encrypted if the other server also supports it. If it doesn't, the email will be transmitted in clear text. Because of this, we recommend against sending sensitive data such as passwords and bank details by email.

# 10.) Hosted Customer Email Services

We host email services for many of our customers and this is on our dedicated UK based servers. These servers are backed up each night to an alternative location and we hold 2 months of backups.

Access to customers email storage is strictly only permitted by 999 Network Services staff by previous agreement with the customer and is for support purposes only. Customers may optionally have their emails filtered for spam and viruses before they are delivered to their mailbox. To provide this, our automated systems will analyse each email as it is received.

## 11.) Hosted Customer Websites

We host websites for many of our customers and this is on our dedicated UK based servers. 999 Network Services are not responsible for the content held on our customer's websites.

Access to customers website data is strictly only permitted by 999 Network Services staff by previous agreement with the customer and is for support purposes only. If complaints are received in regards the content held of customer websites, we reserve the right to disable the site until the problem is resolved. Code may also be removed if we deem it dangerous to other users of our services.

### 12.) Customer Domain Registrations

We register and administer domain registrations on behalf of our customers. Name, address, email and phone number contact details will be shared with registrars and held on the publicly accessible "whois" database.

# 13.) Customer Telephone and Broadband Connections

When we arrange the installation or migration of a telephone or broadband connection on behalf of our customers, name and contact details will be shared with our partner "Zen Internet" for the purposes of installation, support and billing. Zen will share these details with BT Openreach when installation or repairs are required. Unless an ex-directory line is requested, the details will also be publically listed on various directory services. These details will also be shared with the emergency services to assist with "999" calls.

Billing for these services is dealt with directly with Zen Internet and no billing details are held or made available to us.

### 14.) Customer Server Data Backup

We offer backup services for data held on customer servers. This is provided by the "NETSymphony" backup box service.

Data on your server is encrypted before being transferred to NETSymphony servers using SHA256 and curve25519 elliptic curve cryptography. Transferred data is then stored on a UK based server with a RAID6 hard drive array.

Backups are taken automatically every night and 28 days of historic data is retained.

### 15.) Copies and Deletion of Information

If you wish to have a copy of all the information we hold about you, or would like it deleted from our systems, please write to us at the address below with your request.

### 16.) ICO Registration

999 Network Services is registered with the Information Commissioners Office with registration number ZA319086.

### 17.) Ofcom Registration

999 Network Services is registered with Ofcom as a reseller of telecommunication services with RID code "GXY"

#### 18.) Contact Information

For more information or to request copies of your data, please write to: 999 Network Services PO Box 9019 Sudbury Suffolk CO10 1WT

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