Privacy Policy

Sure respects the privacy of you, its customer and takes its responsibilities regarding the security of your customer information very seriously. Sure is committed to providing you with a professional, valuable and personalised service whilst safeguarding your privacy.

This Privacy Policy has been created to explain to you the way in which Sure use your personal data. This information will assist you to determine whether or not to provide Sure with your personal data.

This Privacy Policy applies to all Sure businesses; however, certain Sure group companies outside of Europe, the United States and Japan may adopt separate Privacy Policies applicable only to personal data collected from persons not located in Europe, the United States or Japan. This Privacy Policy applies without exception to all Sure group companies with respect to personal data collected from persons located in Europe, the United States or Japan.

Sure may update this Privacy Policy from time to time. We will notify you of all material changes through the Sure website, www.sure.com, at least 30 days prior to any change being implemented.

This Privacy Policy explains the following regarding Sure's treatment of personal data:

- Definitions of personal data?
- The practices and procedures Sure follow to collect your personal data
- Direct marketing
- Use of "cookies"
- Security of your personal data
- Transfer of your personal data
- Your rights to your personal data held by Sure
- Sure enforcement of this Privacy Policy
- What happens if you have a complaint about Sure's use of your personal data?
- Any questions?

Definitions of personal data?

Personal data is any information that allows you to be identified. The types of personal data Sure will collect may include details of your name, address, telephone number, email address, fax number and date of birth.

Sensitive personal data is any sensitive data relating to you, including information about your racial or ethnic origin, political opinion, religious beliefs or other beliefs of a similar nature, membership of a trade union, physical or mental health or conditions, sexual life, commission or alleged commission of any offence or any proceedings for any offence committed or alleged to have been committed by you, the disposal of such proceedings or the sentence of any court in such proceedings.

The practices and procedures Sure follows to collect your personal data

Sure collects personal data from you through the use of enquiry and registration forms, direct personal contact with you (for example, over the telephone) and every time you email us your details. Sure will only use your personal data where it is necessary to do so because it is relevant to Sure dealings with you or where it is has your consent. Sure will not process sensitive personal data about you without your express consent.

Sure will use your personal data where it is necessary to do so because it is relevant to Sure's dealings with you (i.e. it is relevant to the provision of the goods and/or services that you have requested from Sure) including for billing, customer service and network management.

With your consent, Sure will use your personal data for direct marketing, including the provision of offers for Sure and its third party partners' products and services and customer surveys.

Sure will only use your personal data in a way that is fair and lawful taking into account your consent, the extent to which it is necessary for Sure to use your personal data in its dealings with you and the purposes which are disclosed to you in this Privacy Policy or which are relevant to the reason for your giving your personal data to us. Sure will not sell, trade or rent your personal information to others.

Sure may disclose your personal data to carefully selected business partners and third party suppliers to whom we engage to provide services. However, other than as set out in this Privacy Policy, Sure will not disclose or share your personal data with any other third party without your express consent unless this is necessary to provide the services or products which you requested when providing us with your personal data or as required by law.

Direct marketing

If you have consented at the point of collection to Sure (and/or any third party) providing you with direct marketing material you will be requested to elect the type of media via which this material shall be provided (for example, by post, e-mail, telephone or fax). Sure will only provide you with such material via your chosen media. If, at any stage, you object to Sure's use of your personal data for direct marketing or to the media in which such material is being sent, you may choose to unsubscribe to its receipt. If you have consented to receive third party direct marketing you will need to unsubscribe directly with that third party.

Use of "cookies"

Sure may use "cookies" on its website(s). A "cookie" is information that a website puts on your hard drive so that it can remember pieces of information about you when you next visit the website or a related website. Sure uses cookies to record personal data about you when you use its website in order to facilitate your future activities. Unless otherwise notified by Sure, Sure will not use personal data sent in a cookie for marketing purposes and will not share this personal data with third parties. If you prefer not to receive cookies from Sure's website, you can set your browser to warn you before accepting cookies and refuse the cookie when your browser alerts you to its presence. You can also refuse cookies by turning them off in your browser but this may impair your experience of Sure's website.

Security of your personal data

Sure has in place appropriate technical and organisational security measures to prevent unauthorized or unlawful disclosure or access to or, accidental or unlawful loss of or destruction, or alteration or unauthorised disclosure of or access to, or other damage to your personal data. These measures ensure an appropriate level of security in relation to the risks inherent in the processing and the nature of the personal data to be protected. Your securely held personal data will only be accessible by select authorised members of staff within Sure.

Transfer of your personal data

As Sure is part of an international group of companies operating globally we may store your personal data in your home country and/or we may transfer your personal data to other Sure group companies and carefully selected business partners and third party suppliers in other countries around the world where it has your consent or where it is necessary to do so because it is relevant to Sure's dealings with you. The laws of these other countries may not be the same as the laws regulating the use and transfer of personal data in your home country. However, because every Sure employee around the world is obliged to comply with Sure's comprehensive data protection compliance policies, including this Privacy Policy, Sure is confident that it is able to protect the security and confidentiality of your personal data and provide you with an adequate level of protection in each of the Sure offices in each of the countries to which your personal data is transferred.

Your rights to your personal data held by Sure

Sure will only keep your information for as long as we are either required to by law, or as is relevant for the purposes for which it was collected.

During this period, you may contact the Sure Data Protection Officer at any time if you would like to see details of the personal data that we hold about you, details (available to Sure) as to the source of that personal data, the purposes for which your personal data are being used, details of the parties with whom we may share your personal data or to ask us to correct, update, supplement or delete this personal data.

Sure enforcement of this Privacy Policy

Data Protection Officers have been appointed in each country where Sure has an office. Your local Sure office will be able to put you in contact with this person. If you have a question or enquiry about this Privacy Policy or a complaint about the way Sure has used your personal data you should first contact your local Data Protection Officer who will be able to assist you.

The Sure Legal & Regulatory Director has the responsibility to ensure that each Sure office complies with this Privacy Policy around the world. It is also the responsibility of the Legal & Regulatory Director to deal with and respond to all enquiries from any national Data Protection authority or governmental authority.

Each local Data Protection Officer reports directly to the Legal & Regulatory Director. The Legal and Compliance Director and each Data Protection Officer meet on an 'as necessary' basis to discuss this Privacy Policy and any individual complaints or disputes not resolved at the local level.

The Legal & Regulatory Director is accountable for Sure's compliance with the Privacy Policy. Sure conducts regular audits of its compliance with this Privacy Policy. The Legal & Regulatory Director can be contacted at PO BOX 3, Centenary House, La Vrangue, St Peter Port, Guernsey, GY1 3AB. The Legal & Regulatory Director can also be contacted on telephone number +44 (0)1481 700700.

What happens if you have a complaint about Sure's use of your personal data?

If you make a complaint to your local Data Protection Officer and your complaint is unable to be resolved to your complete satisfaction, your complaint will be passed to the Legal & Regulatory Director to be resolved. If your complaint is still unable to be amicably resolved, it will be escalated. Any finding of misuse of your personal data by Sure shall be remedied as soon as reasonably possible.

Any questions?

Please contact the Data Protection Officer in your home country or the Legal & Regulatory Director.

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