

Customer Privacy Notice (Emtel Ltd)

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

Contact details

Post - Unit 17, Renewal Trust Business Centre, 3 Hawksworth St, Nottingham, NG3 2EG

What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery:**

- Names and contact details
- Addresses
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Account information
- Call recordings

We collect or use the following information for **the operation of customer accounts and guarantees:**

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Purchase history
- Account information, including registration details
- Marketing preferences

We collect or use the following information for **service updates or marketing purposes:**

- Names and contact details
- Addresses
- Marketing preferences
- Location data

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
- **Your right to erasure** - You have the right to ask us to delete your personal information.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information.
- **Your right to object to processing** - You have the right to object to the processing of your personal data.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for the **operation of customer accounts and guarantees** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Where we get personal information from

- Directly from you
- Credit reference agencies
- Providers of marketing lists and other personal information

How long we keep information

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

| Type of Record | Retention Period | Rationale/Legal Basis |
|---|--|---|
| Accounting & Financial Records (Invoices, receipts, P&L statements, expense records) | 6 years after the end of the current financial year | Required by HMRC and the Companies Act |
| Employee/HR Records (Successful candidate records, contracts, payroll details, P45/P60) | 6 years after employment ends | To cover potential legal claims (e.g., under the Limitation Act) and HMRC requirements |
| Recruitment Records (Unsuccessful candidates' application forms, interview notes) | 6-12 months | To cover potential discrimination claims |
| Contracts & Agreements (Client/supplier contracts, leases, deeds) | 6 years after the contract ends or property is no longer occupied | Limitation Act 1980 allows legal action for simple contracts up to 6 years after a cause of action arises |
| Corporate/Legal Records (Articles of association, meeting minutes, policies) | Permanent or 'until superseded + 10 years, then review' | Documents the institution's regulations and policies; may have historical value |
| Complaints/Customer Enquiries | 3 years from the date of the last action/closure of enquiry | Common practice, general business need, or specific regulatory guidance for certain sectors |
| Marketing Data (Personal data used for marketing with consent) | Reviewed periodically; retained only as long as necessary for the stated purpose | UK GDPR principle of "storage limitation"; requires data minimisation |

Who we share information with

- Emergency services

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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