

# Pure Telecom Limited - Privacy Notice

Pure Telecom Limited “Pure” or “Pure Telecom” are an independently owned Telecoms provider operating primarily in the Irish Market. Pure Telecom provide telephone and/or broadband services. Data collection, processing and use are conducted solely for the purpose of carrying out the above mentioned objectives.

## **Our contact details are:**

**Contact:** Data Protection Office

**Address:** 3018 Lake Dr, Citywest Business Campus, Dublin 24

**Phone:** 1800 844 023

**Email:** [dataprotection@puretelecom.ie](mailto:dataprotection@puretelecom.ie)

Pure Telecom is committed to protecting the privacy and security of your personal information. This privacy notice describes how we collect and use personal information about you during and after your relationship with us.

## **How we collect personal information about you**

All personal information will be obtained fairly. We obtain personal information about you in various ways. This can happen automatically, when we’ve asked you to provide it (e.g. for the purposes of entering into a contract). We will make you aware of all purposes that we intend to use your personal information at the time of collection or the purposes will be advised to you prior to use.

For example, we can collect personal information when you:

- Buy or use any of our products and services;
- Register for a specific product or service;
- Contact us in any way, or ask for information about a product or service;
- Visit or browse our website;
- Have given permission to other companies to share information about you;

We may collect information from certain organisations, where appropriate. These include fraud-prevention agencies, business directories and credit reference agencies.

We use cookies (small text files stored in your browser) and other techniques such as web beacons (small, clear picture files used to follow your movements on our website). For more details on this and how to opt out of these, check our [cookies policy](#)

All personal information will be accurate and complete and where necessary, kept up to date.

All methods of acquiring personal information from you (e.g. customer application forms) will have a clear information piece explaining any intended purposes including any secondary uses that may not be obvious to you (e.g. if competition entries are intended to be used for marketing purposes this will be clearly advised to you, and you will have the opportunity to express if your choice is to opt in for such processing of your personal information).

## **What we collect about you**

Information we collect about you can vary depending on the products and services that you use and subscribe to, how you have used the products and services, and how you have interacted with Pure Telecom even if you aren’t a customer, or what we have obtained from a third party with permission to share it with us.

The types of information we may have are, for example:

- Your name, address, phone and/or mobile number, your date of birth, gender and email address;

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- Your credit or debit card information, information about your bank account and other banking information – for example, you'll have to give us this information when you open an account with us.
- Your contact with us, such as a note or recording of a call you make to one of our contact centres, a Live Chat, an email or letter sent, or other records of any contact with us;
- Your account information, such as dates of payment owed or received, subscriptions you use, account numbers or other information related to your account;
- See our [Cookies policy](#) for details on what we collect using cookies;
- Call traffic details (including the time and date of calls for billing purposes) and data usage (to enable us to charge you the right amount and to alert you if you're close to your usage limit).
- Your location data is derived from your IP address or data such as a post code or name of a town or city;
- Information we obtain from other sources, such as credit agencies, fraud-prevention agencies, and from other data providers and could include demographic data, interest based data, and internet browsing behaviour.

## How we use your information

Personal information will be kept only for clear and legal purposes. All personal information will be processed fairly and in keeping with the purposes for which it was obtained.

We will only process your personal information where we have a lawful purpose to do so, for example:

- Where you have provided your consent. You can withdraw your consent at any time and we will provide you with details on how to withdraw your consent at the time we capture same;
- For the preparation or performance of a contract with you; or
- Based on our legitimate interests to provide services and products to you. We set out below some of the legitimate business reasons why we process your personal information.

Personal information will not be used, disclosed or processed in any manner incompatible with the purposes for which it was obtained. We will not use your personal information for other compatible secondary purposes without advising you.

We may use and analyse your information to, for example:

### Credit checks and ID

- Carry out a credit check when you apply for a contract for any products or services with us.
- We may also use your personal information for identity verification purposes, for access to your account and for general account management.

### Processing your order and provide you with your service(s)

- Process the products and services you've bought from us, and keep you updated with the progress of your order.
- Provide the relevant product or service to you. This includes other services not included in your agreement with us, services that use information about where you are, and to contact with you messages about changes to the products or services.

### Billing and Customer Care

- Bill you for using our products and services, or to take the appropriate amount of credit from you.
- Respond to any questions or concerns you may have about our network, products or services.

### Keep you updated about products and services

- Keep you updated with current information about products and services you've taken.
- Keep you informed generally about new products and services, send you newsletters or white papers, to invite you to participate in a survey or to let you know about offers, promotions, prize draws or competitions (unless you choose not to receive our marketing messages). These messages can be based on how you use our products and services which could include, for example, your calling and messaging activities, location information and browsing information.

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- We'll also let you know about other companies' products and services we think may be of interest to you (unless you prefer not to).

## **Manage our networks and understand network usage**

- Protect our networks and manage the volumes of calls, texts and other uses of our networks. For example, we identify peak periods of use so we can try and ensure the networks can handle the volume at those times;
- Understand how you use our networks, products and services. That way we can seek to review, develop and improve these, develop more interesting and relevant products and services, as well as personalising our products and services;

## **Fraud Prevention**

- Protect and detect fraud or other crimes, to protect and detect misuse or damage to our networks, to recover debts or trace those who owe us money.

## **Research and analytics**

- Market research and to carry out research and statistical analysis including to monitor how customers use our networks, products and services on an anonymous or personal basis so that we do not identify you as an individual. Provide reports to third parties (such reports don't contain information which may identify you as an individual).

## **How we disclose your personal information**

Disclosure of personal information will only be made to third parties who are our agents or servants acting on our directions. Save as required by law (e.g. criminal investigations) no disclosure of personal information will be made to third parties for those third parties' own purposes or use.

- For fixed services your NDD Opt Out preference will transfer automatically from your previous provider, unless otherwise specified.
- You may wish to contact customer service on 1800 844 023 or email us at [dataprotection@puretelecom.ie](mailto:dataprotection@puretelecom.ie) if you would like to amend these preferences.

## **How we share your personal information**

We may share information about you with:

- Partners or agents involved in delivering the products and services you've ordered or used;
- Companies who are engaged to perform services for, or on behalf of Pure Telecom Limited;
- Credit reference, fraud-prevention or business-scoring agencies, or other credit scoring agencies;
- Debt collection agencies or other debt-recovery organisations;
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement;
- Other third parties when you have given us your consent to the disclosure for authentication and fraud-prevention purposes.

## **Fraud management and law enforcement**

We'll also release information if it's reasonable for the purpose of protecting us against fraud, defending our rights or property, or to protect the interests of our customers.

## **Third parties that we work with**

Where you've purchased Pure Telecom products and services using a third party or partner organisation, we may need to exchange information with them as part of managing that relationship and your account – for example, to be able to identify your order and be able to pay them.

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If we have a contract with a service provider or contractor to provide us with services or provide a service on our behalf, and they may have access to your personal information, we don't authorise them to use or disclose your personal information except in connection with providing their services.

## How long we keep your personal information

We'll store your information for as long as we have to by law. If there's no legal requirement, we'll only store it for as long as we need to in order to provide products or services to you.

Where applicable and in order to offer you information on our products and services, we collect and store certain information for so long as you remain a customer of Pure Telecom. In relation to receiving information about our similar products and services, your marketing consent to electronic marketing will remain valid for a further 12 months after receipt of an email or SMS from us unless you opt-out of receiving further electronic marketing communications from us. You can of course also contact us at any time by calling our Customer Service free of charge on 1800 844 023 or contact us as set out in the 'Your rights' section of this Policy.

## Keeping your personal information secure

We have a dedicated IT department who maintain oversight of security and controls. The team reviews and improves our measures to protect your personal information from unauthorised access, accidental loss, disclosure or destruction.

Communications over the internet (such as emails) aren't secure unless they've been encrypted. Your communications may go through a number of countries before being delivered, as this is the nature of the Internet.

We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

We'll never ask for your secure personal or account information by an unsolicited means of communication. You're responsible for keeping your personal and account information secure and not sharing it with others.

## Your Rights in connection with your personal information are to:

1. To find out whether we hold any of your personal data, if we do to request access to that data that to be furnished a copy of that data. You are also entitled to request further information about the processing.
2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you rectified.
3. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
4. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
5. Request the restriction of processing of your personal information. You can ask us to suspend processing personal information about you, in certain circumstances.
6. Where we are processing your data based solely on your consent you have a right to withdraw that consent at any time and free of charge.

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7. Request that we: a) provide you with a copy of any relevant personal data in a reusable format; or b) request that we transfer your relevant personal data to another controller where it's technically feasible to do so.
8. 'Relevant' personal data is personal data that: You have provided to us or which is generated by your use of our service. Which is processed by automated means and where the basis that we process it is on your consent or on a contract that you have entered into with us.

You have a right to complain to the Data Protection Commissioner (DPC) in respect of any processing of your data by:

- Telephone +353 57 8684800 +353 (0)761 104 800
- Lo Call Number 1890 252 231
- E-mail [info@dataprotection.ie](mailto:info@dataprotection.ie)
- Postal Address  
Data Protection Commissioner  
Canal House Station Road  
Portarlinton  
R32 AP23 Co. Laois

Please note that the above rights are not always absolute and there may be some limitations.

To request access to your details, please send a letter or email [dataprotection@puretelecom.ie](mailto:dataprotection@puretelecom.ie) to Pure Telecom for the attention of the Data Protection Officer.

There is no fee in using any of your above rights, unless your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to verify your identity if we have reasonable doubts as to who you are. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

**Ensuring our information is up to date and accurate:** We want the service provided by us to meet your expectations at all times. Please help us by telling us straightaway if there are any changes to your personal information. If you wish to avail of any of these rights, please contact us at our contact details above

**Updates:** We will update our Data Privacy Notice from time to time. Any updates will be made available and, where appropriate, notified to you by SMS, email or via our website.