EBBE ONE

Privacy Notice

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1. Introduction

Ebbe Fone Galleria Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

2. About Us

"We", "us", "our", "Ebbe Connecting Business" refer to Ebbe Fone Galleria Limited. We are a limited company registered in England and Wales under registration number 03092533.

Our Registered address is at Centurion House, 129 Deansgate, Manchester, England, M3 3WR

Our Trading address is at 1-2 Kingsway Buildings, Kingsway, Manchester M19 1PH.

3. Purpose of this Privacy Notice

This Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

This Privacy Notice should be read together with our terms and conditions which can be found on our website.

4. What is personal data

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. What personal data we collect

We may collect some or all of the following personal data:

- Name and other identifying information: Title, Name, Gender, Date of birth, Business Name, Job title etc.
- Contact details: Address, Telephone number, Email address etc.
- Financial information: Bank account details, Utility bills as proof of identity
- Information about your usage of our product and services: Billing information, Call attempts, Call history, Equipment make and model

6. Why we need this information

We need this information to understand your needs and provide better services particularly for the following reasons:

- Internal record keeping for the provision and management of your account.
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Communicating with you. This may include responding to emails or calls from you.
- Billing purposes
- Meeting with our statutory requirements e.g. HMRC, Accounting practices

7. How we use your personal data

Under the GDPR, we must always have a lawful basis for processing personal data. We believe there are 3 lawful basis of processing personal data. These are described below. The examples in the table are not exhaustive, but provide an idea depending on the context of processing of personal data.

Lawful Basis - Contract

Example

- To enable us to fulfil our contractual obligations to you
- To enable us to provide you with an Account and Service
- To provide you with Product and Service information including quotes

Lawful Basis - Legitimate Interest

Example

- For marketing purposes, to keep you updated with information about our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out or unsubscribe.

- Fraud/Crime Detection and Prevention (to protect the interests of Ebbe, its customers and potentially you)

Lawful Basis - Legal Obligation

Example

- Where we need to comply with our statutory obligations e.g. HMRC, Accounting compliances.

8. How long we keep your personal data

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. There are also legal obligations we are required to abide by storing data for a minimum or maximum duration. For example, payment and billing information will be kept for 6 years to meet with legal requirements. Please contact us if you have any questions regarding our data retention policy.

9. How and where we store or transfer your personal data

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction, or damage.

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

10. Sharing your personal data and third-party processing

We may process your information through our core service providers and third-party platforms as required for our business to function. These include:

- Our service providers and agents (including their sub-contractors) or third-parties which process information on our behalf (e.g. internet service and platform providers, payment processing providers, and those organisations we engage to help us manage communications with you) so that they may help us to provide you with the products, services, and information you have requested or which we believe is of interest to you.
- Third-parties used to facilitate payment transactions, for example clearing houses, clearing systems and financial institutions
- Third-parties where you have a relationship with that third party and you have consented to us sending information (for example Network providers)
- Credit reference and fraud prevention agencies
- regulators to meet our legal and regulatory obligations

- law enforcement agencies so that they may detect or prevent crime or prosecute offenders
- any third-party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts
- our own professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities
- another organisation if we sell or buy (or negotiate to sell or buy) any business or assets and
- another organisation to whom we may transfer our agreement with you.

Every external company we work with has a contract with us which clearly sets out our expectations and requirements in handling personal information and obligates them to meet these standards and those contained in the GDPR.

11. Your rights

Under the GDPR, you have the following rights, which we will always work to uphold:

- **Right of Access:** The right to access the personal data we hold about you. Part 12 will tell you how to do this.
- **Right to Rectification:** The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.
- **Right to Erasure:** The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have.
- **Right to Restrict Processing:** The right to restrict (i.e. prevent) the processing of your personal data.
- **Right to Object:** The right to object to us using your personal data for a particular purpose or purposes.
- **Right to Data Portability:** This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 13.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

12. How to access your personal data

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 13.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

13. Contact us

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

- Email address: hello@ebbe.co.uk.
- Telephone number: 01614422000
- Postal Address: 1-2 Kingsway Buildings, Kingsway, Manchester M19 1PH

14. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be made available on our website www.ebbe.co.uk