

# Privacy statement for ElephantWiFi

## Who are we and why are we telling you this?

Proximity Futures Ltd (t/a ElephantWiFi) are the company who (on behalf of Royal Sutton Coldfield Town Council) provide the free WiFi you are connecting to. We (ElephantWiFi) take the protection of your privacy very seriously.

As Data Controller (as described by the GDPR), we will only use any personal information you provide to deliver the products and services you have requested from us, to meet our legal responsibilities and to provide statistical information to Royal Sutton Coldfield Town Council

## How do we collect information from you?

We obtain information about you when you sign up to use the WiFi service we provide (on behalf of Royal Sutton Coldfield Town Council). We will also collect information if you use our website (for example when you contact us about our products and services) or when you contact us directly.

## What type of information do we collect from you?

The personal information we collect from you will vary depending on what product/s and/or service/s you engage us to deliver. The personal information we collect will usually include your name and email address. We might also ask you to provide us with your age, gender, date of birth, address details. If you register for our services using Facebook, we might also request further information from Facebook to help us better understand who you are and how we might improve our service to you.

## How is your information used?

In general terms your data is used to help Royal Sutton Coldfield Town Council to make informed decisions that benefit the town.

Whilst we maintain individual records, we are not interested in individuals, but rather on the information we can learn from large numbers of users. In simple terms, we bundle everyone together, and look for trends that can tell us things.

By looking at who, how, where and when the WiFi service is used, we can provide accurate statistical data to Royal Sutton Coldfield Town Council to help identify the best ways to improve the services they provide. We may use your information (along with everyone else) to:

- Understand how frequently people visit the town
- What the ratio of repeat visitors to new visitors (tourists) is
- How successful town managed events are
- Where people go in the town, and where needs improving
- How people move through the town

## How long do we keep your data?

We will keep your data for a maximum of 13months.

## Who has access to your information?

ElephantWiFi has sole access to the data you provide us with.

We analyse the data we collect on behalf of Royal Sutton Coldfield Town Council, making anonymised results available to them to support their decision making process. This does not, however, contain data that could be used to identify you.

Any staff within ElephantWiFi with access to your information will have a contractual duty of confidence.

Third Party Service Providers working on our behalf: We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to provide you with information that you have requested when you register to use the WiFi). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. Please be reassured that we will not release your information to third parties unless you have requested that we do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

## How you can access and update your information

Keeping your information up to date and accurate is important to us. You can help us by checking the information we hold on you is up to date online in your account area. You can access and amend the data we hold on you at any time by visiting your Profile Portal. In the Portal you can manage your marketing preferences and edit or delete your Profile if you no longer wish to use the Service.

To complete the setup of the Profile Portal an email will be sent asking you to set a password therefore it is vital you provide a current, accessible email address.

The Profile Portal is accessible whenever you connect to the WiFi we provide on behalf of Royal Sutton Coldfield Town Council.

You also have the right to ask for a copy of the information we hold about you. This will be the same information that is available online in the Profile Portal.

## Security precautions in place to protect the loss, misuse or alteration of your information

While we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access information, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Your data will only be processed in our offices, and within secure data centres within the UK.

We take the security of your data seriously and so all our systems have appropriate security in place that complies with all applicable legislative and regulatory requirements.

## Your choices

We may occasionally contact you by post / email / telephone with details of any changes in legal and regulatory requirements or other developments that may be relevant to your affairs and, where applicable, how we may assist you further.

## Your rights

**Access to your information:** You have the right to request a copy of the personal information about you that we hold.

**Correcting your information:** We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

**Deletion of your information:** You have the right to ask us to delete personal information about you where:

- you consider that we no longer require the information for the purposes for which it was obtained or that we no longer need to retain it in accordance with our statutory obligations;
- you have validly objected to our use of your personal information - see 'Objecting to how we may use your information' below;
- our use of your personal information is contrary to law or our other legal obligations.

**Objecting to how we may use your information:** Where we use your personal information to perform tasks carried out in the public interest then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

**Restricting how we may use your information:** In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where there is no longer a basis for using your personal information but you do not want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

## Changes to our privacy statement

We keep this privacy statement under regular review and any updates or changes will be reflected here.

This privacy statement was last updated on 7<sup>th</sup> March 2019.

Contact information and further advice can be requested from:

ElephantWiFi

22 Greenfields Business Park, Wheatfield Way, Hinckley, Leicestershire, LE10 1BB

## Complaints

We seek to resolve directly all complaints about how we handle your personal information, but you also have the right to lodge a complaint with the Information Commissioner's Office [[www.ico.org.uk](http://www.ico.org.uk)].