

This Privacy Policy is meant to help you understand:-

- What data we collect
- Why we collect it
- What we do with it

This is important; we hope you will take time to read it carefully. This Privacy Policy sets out the basis on which any personal data we collect from you or that you provide to us will be processed by us. By using our Wi-Fi and/or Application services you are agreeing to its terms.

### **About us / our services**

We are InTechnology Wi-Fi Limited (company number 08850166) and we provide 24x7 free Wi-Fi solutions for cities, festivals and events accessed through a mobile application ("Application"). The Application is free of charge but does require you to go through a sign up / sign in process.

The network is accessible to any end user, irrespective of their country of origin, network affiliation or device type. The network is completely free of charge to any resident, or tourist without exception via a mobile handset, PC or laptop.

InTechnology Wi-Fi Networks and Applications will be referred to as 'Services' or 'our Services' throughout this document.

We are registered under the Data Protection Act 1998 with the Information Commissioner's Office (ICO) in the UK. When you use our Services, you trust us with some information, this can be personal and also non personal. In legal terms used by the ICO we are described as the "data controller" of the personal data you provide to us. This is a legal term used to describe the person or organisation which controls the way personal data is used and processed.

### **What information do we collect from you and when do we collect it?**

We may collect information from you to help us provide better services to all of our users from understanding what parts of our Application people use to try to make sure we're showing you content that you're most likely to find interesting and useful.

There are two types of information we collect Personal and Non Personal. "Personal" information uniquely identifies a user and contains personally identifiable information provided by or obtained from users. "Non-Personal" information does not, by itself, identify a visitor or Owner as a specific individual. Non-personal information provides technical data, such as IP addresses and browser information that may provide information about your computer or your interaction with our Services.

- We collect information about you when you sign up for our Services or log into our wireless network. Also when you sign up for or opt in to receiving any specific marketing communications from us or our selected partner.

- Technical information from and about the devices you use to access our Services when you log in / are using our Services. We collect the unique identifying codes, device model, device name, operating system / version and details of your web browser. This helps drive the content we deliver to you and can also help with the collection of diagnostic and traffic information.
- We collect location data to provide location-based services such as 'events near me'. We may collect details from your device around its location from our Wi-Fi / cell tower locations, and other technologies to determine your devices' approximate location. Unless you provide consent, this location data is collected anonymously in a form that does not personally identify you and is used only to improve location-based products and services. For example, your device may share its geographic location with application providers when you opt in to their location services.

Some of our location enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose.

- IP address (this is a number that identifies a specific network device on the internet and is required for your devices to communicate with websites) and location data.
- Your social media content within the Application such as the 'like' buttons and forum posts. This includes messages you send direct to us via social media and may also include posts and comments, pictures and video footage.
- Other forms of direct contact from you to us such as emails, forum messages and phone calls, this is to help us identify you, fix issues and improve our service.
- Information provided by other companies who've obtained your permission to share information about you, for example your social media user name if you've chosen to use those credentials to access our Services
- When using the Application we may track what content you choose to access within the Application and what time you did this. We may also collect information about you if you have consented to other organisations sharing that information with us or with organisations like us.

**We use information held about you for the following purposes.**

- To provide you with our Wi-Fi networks and mobile apps, which all require a certain amount of technical information to work properly.
- To power our security measures and services so you can safely access our Services. It also lets us do things that should recognise your username and password including enabling you to reset your password should you forget it. If you use your social media account to access our Services, please note that we do not store your password such as facebook password. We also do not store your password if your account has been created via an email.

- If you have 'opted in' we may contact you from time to time regarding things you have told us you want to hear about. This could be special offers, new products or events. If you use our Application, we may highlight certain offers or events that may be of interest to you.
- To respond to any social media posts or other public comments that you might make, whether they are directed to us or about us or our Services.
- To advertise products or services to you on your favourite social media site such as Facebook or Twitter.
- To tell you about any changes to our Services or activities or apps.
- To gather statistics about how you and other people use our Services and what you think of our advertisements, product information, social media and other content. We analyse this data to see if what we do is interesting to people and meets their needs or whether it can be improved and if so, what changes can be made.
- To monitor how people use our Services and apps to see if they are being abused or threatened for example by internet trolls posting inappropriate comments in review areas.
- To allow us to understand our customer base across all our businesses both online and elsewhere. We merge your details with information from other customers and other users of our Services. This is done on an anonymous and aggregated basis. We can then spot trends and factors and try to match our Services to the things we believe you and other people like you would be most interested in. We look at trends based on people's geographic location, behaviours etc.

### **Where we store your personal data**

When you use our Services we will store certain information in server logs. That information will typically be internet protocol (IP) addresses, details of the internet service provider (ISP), clickstream data, browser type and language, viewed and exit pages and data time stamps.

You further agree that we and our authorised agents and representatives may from time to time transfer your details to recipients in countries outside the European Economic Area (which may offer lower standards of data protection) to be used for the purposes set out in this Privacy Policy.

### **Children**

We understand the importance of taking extra precautions to protect the privacy and safety of children using the internet as such our Services are only available to those aged 13 or above. Accordingly, we do not knowingly collect, use or disclose personal information from children under 13, or equivalent minimum age in the relevant jurisdiction, without verifiable parental consent. If we learn that we have collected the personal information of a child under 13, or equivalent minimum age depending on jurisdiction, without first receiving verifiable parental consent we will take steps to delete the information as soon as possible.

Children under the age of 13 are not permitted to create their own accounts.

### **Disclosing data**

We never disclose personal data to third parties without the consent of the individual concerned or other reasonable justification.

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

It may be necessary – by law, legal process, litigation, and/or requests from governmental authorities within or outside your country of residence – for InTechnology Wi-Fi to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

### **Access to information**

The Data Protection Act 1998 gives you the right to access any personal data held by us. Your right of access can be exercised by making a request to us and on payment of a fee of £10 to meet our costs. You can contact us in the "Contact us" section below.

### **Updates to this Policy**

We may need to update this Policy from time to time as our business changes. We will endeavour to tell you in advance by sending a service message to you if we hold your email address. Otherwise please look out for the flags on our Application, which indicate that we have changed this Policy. If you continue to use our Services after we have changed our Policy you will be deemed to have accepted the changes.

### **Privacy Questions**

If you have any questions or concerns about InTechnology Wi-Fi's Privacy Policy or data processing or if you would like to make a complaint about a possible breach of local privacy laws, please contact us [customersupport@intechologywifi.com](mailto:customersupport@intechologywifi.com).

All such communications are examined and replies issued where appropriate as soon as possible. If you are unsatisfied with the reply received, you may refer your complaint to the Information Commissioner's Office (ICO) online at [www.ico.org.uk](http://www.ico.org.uk). The ICO regulates the Data Protection Act 1998 and there is some useful guidance available on the website. If you ask us, we will endeavour to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

**Contact us**

You are welcome to get in touch with us to discuss your information at any time.

Our contact details are: InTechnology Wi-Fi, Cardale House, Cardale Court, Beckwith Head Rd, Harrogate, HG3 1RY.