

Privacy Policy

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EU-wide data protection legislation known as the "General Data Protection Regulation" or "GDPR" took effect from May 25th, 2018. Following the UK's withdrawal from the European Union on 31st January 2020, the GDPR has been retained in domestic law as the UK General Data Protection Regulation "UK GDPR" (a copy of which is posted [here](#)), but the UK has the independence to keep the framework under review. The UK GDPR sits alongside an amended version of the Data Protection Act 2018.

This website Privacy Policy is intended to meet our duties of Transparency under the UK GDPR, the Data Protection Act 2018 and all other applicable privacy laws.

We will post any modifications or updates to this Privacy Policy on this page.

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below.

1. WHO WE ARE

This is the privacy policy of Burnham Management Ltd, a UK company with company registration number 16411547. The controller will be the relevant company responsible for the website this privacy policy is located on. Our main registered address is 19-21 Great Tower Street, London, England, EC3R 5AR. We provide telephony, broadband and fibre services. We are responsible for your personal information as a Data Controller and are registered with the Information Commissioner's Office (ICO) under registration number – ZB894657

We have a Data Protection Officer who is responsible for overseeing and advising us in relation to our compliance with the GDPR and our compliance with this Privacy Policy.

Should you have any questions regarding our processing of your personal information, please contact the Data Protection Officer directly using the details below:

Data Protection Officer
Burnham Management Limited
Unit 2 Near Train Station, Station Road, Alton, GU34 2PZ
Dataprotection@burnhammanagement.co.uk

2. WHO DOES THIS PRIVACY POLICY APPLY TO:

This privacy policy applies to:

- a) Customers;
- b) Prospective customers;
- c) Individuals that use our websites;
- d) Former customers;
- e) Nominated users or individuals acting under a power of attorney;

Our services are not intended for children, unless we expressly state otherwise, and we do not knowingly collect or process personal data relating to children or anyone aged under 18 years.

It is important that the personal data we hold about you is accurate and current. It's your responsibility to keep us up to date if you make any changes to your personal data. If you do make any changes, please contact our Data Team on 0333 305 7560 or email Dataprotection@burnhammanagement.co.uk

3. WHAT PERSONAL INFORMATION DO WE COLLECT:

Personal information is any information that can identify a natural person. We may collect, use, store and transfer different categories of personal information to enable us to deliver our services, as follows:

- a) Information about your Identity including first name, last name, and title.
- b) Information about your contact details including service address, correspondence, company name (where applicable), billing address, email address, landline telephone number and mobile phone number;
- c) Financial information including your bank account details for a direct debit and payment card details and your credit rating.
- d) Information relating to a transaction including details about payments to and from you and about the products and services that you have purchased from us.
- e) Technical information including IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, online chat logs and other information on the devices you use to access our services.
- f) Information about your usage on our network on all of our products and services;
- g) Information relating to your marketing and communications choices including by what method you would like to receive marketing.

We may also collect and use non-personal information such as aggregate, statistical or demographic data. This information may be derived from your personal information but is not considered personal information as this information cannot directly identify you.

We do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric information). Nor do we collect any information about criminal convictions and offences.

4. HOW DO WE COLLECT YOUR INFORMATION?

Information you give us:

- a) When you place an order with us for any of our services (for example over the phone, online or through a third-party affiliate), we will need certain information to process your order.
- b) When you contact us to discuss your services, we may ask for certain information to be able to confirm your identity, check our records and answer your questions quickly and accurately.
- c) If you take part in any trials, complete any survey or enter any competitions we may ask for information about you, which we will make clear to you at the time and for the purpose we will be using this information.

Information we automatically collect:

- a) We will automatically collect information:
 - (i) when you use our services; and
 - (ii) when you visit our website, we may collect and process information about your usage of these by using “cookies” and other similar technologies to help us make improvements to the websites and to the services we make available.
 - (iii) when you download content from our website, where applicable, have requested or consented to location services, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as search results, and other personalised content. Most mobile devices allow you to turn off location services. Our website does not collect precise information about the location of your mobile device.

Information we receive from other sources:

- a) We may receive personal information about you from third parties or publicly available sources in the following categories:
 - (i) companies contracted by us to help us provide services to you;
 - (ii) other telecommunications operators when transferring services;
 - (iii) marketing organizations such as Lead365 - <https://lead365.co.uk/privacy-policy/>
 - (iv) credit reference agencies or fraud prevention agencies.

5. HOW DO WE USE YOUR PERSONAL INFORMATION?

The information we collect helps us to better understand what you need from us and to improve the provision of our services to you.

We use the information collected for example to:

- a) verify your identity when you use our services or contact us;
- b) process your enquiries, orders or applications, for example when assessing an application, we may use automated decision-making systems;
- c) monitor, record, store and use any telephone, e-mail or other electronic communications with you for training purposes, so that we can check any instructions given to us and to improve the quality of our customer service, and in order to meet our legal and regulatory obligations;
- d) where you have agreed, provide you with information about other services, offers or products which you may be interested in;
- e) to tell you about changes to our websites, services or terms and conditions;
- f) carry out any marketing analysis, profiling or create statistical or testing information to help us personalise the services we offer you and to understand what our customers want;
- g) recover any monies you may owe to us for using our services;
- h) analyse our services with the aim of improving them;
- i) prevent or detect a crime, fraud or misuse of, or damage to our network, and to investigate where we believe any of these have occurred;
- j) and monitor network traffic from time to time for the purposes of backup and problem solving, for example our automated system may monitor email subjects to help with spam and malware detection.
- k) with your consent, we may call you on behalf of selected third party organizations to promote their products and services which may be of interest to you.

Such third parties may operate in the following sectors:

Automotive / Retail / Finance / Gambling / Insurance / Travel / Lifestyle / General / Utilities / Security / Mobile

Third party partners include the following:

Currys PLC : [Privacy and Cookies](#) | [Currys](#)

Fusion Fibre: [Legal Information](#)

Lead365 - <https://lead365.co.uk/privacy-policy/>

Your data may also be used for other purposes for which you give your specific permission or, in very limited circumstances, when required by law.

We may supplement the information directly collected by us with data from third parties (for example socio-demographic data) to further improve the services or products we offer customers.

6. <https://uk-gdpr.org/> SHARING YOUR PERSONAL INFORMATION WITH OTHERS

We may need to share your information with organizations outside Burnham Management Ltd e.g. to help us provide our services to you.

The categories of non- Burnham Management Ltd parties that we may share your personal information with are:

- a) Third party suppliers who help Bur Burnham Management Ltd Group to perform our services;
- b) Professional advisors;
- c) Law enforcement agencies;
- d) Other companies as part of the process of selling one or more of our businesses or part of those businesses; and
- e) Regulators (such as Ofcom or the Information Commissioner's Office).
- f) With your consent, selected third party organizations where you have expressed an interest in receiving further information concerning their products and services

7. HOW DO WE PROTECT YOUR PERSONAL INFORMATION

We take protecting your information seriously and will do our utmost to employ appropriate organizational and technical security measures to protect you against unauthorized disclosure or processing of your personal information.

Unfortunately, we cannot guarantee the security of transmitting information via the internet. We have tried to create a secure and reliable website and mobile application for our users in line with industry standards. However, we have no responsibility or liability for the security of personal information transmitted via the internet.

8. OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

We process each type of personal information for one the following reasons:

- a) We need to process the information under our contract with you for our services;
- b) We have a legitimate interest as a business in processing your personal information provided those interests are not outweighed by your interests, fundamental rights and freedoms.;
- c) We have a legal obligation to process your personal information; or
- d) We have your consent (which you can withdraw at any time by emailing dataprotection@burnhammanagement.co.uk

If you do not provide us with the information we need, then we may not be able to perform our contract with you and may need to terminate the contract. If this happens, we will notify you as set out in our [Legal Information](#)

9. TRANSFERS OF PERSONAL INFORMATION OUTSIDE THE EEA

From time to time, the third parties we share our data with may be outside the European Economic Area (EEA), in countries that do not always have the same standard of data protection laws as the UK. However, we will have a contract in place to ensure that your information is adequately protected, and we will remain bound by our obligations under applicable UK data protection laws.

The sorts of measures we use to protect your personal information are security reviews of the organizations, contractual model clauses approved for use by the European Commission or other approved transfer mechanisms

10. HOW LONG DO WE HOLD YOUR PERSONAL INFORMATION FOR

Unless there is a specific regulatory or legal requirement for us to keep your information longer, we will keep your information for as long as it is necessary for the purpose for which it was collected.

11. YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

Under data protection law you have rights regarding how we process your personal information.

You are not required to pay any charge for exercising your rights. We have one month to respond to you, and you may be asked for ID to confirm your identity.

To exercise any of the following rights, please use the contact details listed at the bottom of this section:

Your right of access - You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. [You can read more about this here](#)

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. [You can read more about this right here](#)

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances. [You can read more about this here.](#)

Your right to restrict processing - You have the right to ask us to restrict the processing of your information in certain circumstances. [You can read more about this here.](#)

Your right to object to processing - You have the right to object certain types of processing including withdrawing your consent for direct marketing, unless the processing forms part of our public tasks, or is in our legitimate interests. [You can read more about this right here](#)

Your right to data portability - This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. [You can read more about this here.](#)

Your rights related to automated decision-making including profiling – We do not use automated decision-making processes which would cause a potentially damaging effect to you. [You can read more about this here.](#)

If you wish to exercise your rights under the UK General Data Protection Regulation (UK GDPR) or have any queries in relation to your rights or privacy matters generally please email our Data Protection Officer at dataprotection@burnhammanagement or by post at:

Data Protection Officer
Burnham Management Limited
Unit 2 Near Train Station, Station Road, Alton, GU342 PZ

If we are unable to resolve your request to your satisfaction, you have the right to complain to the relevant supervisory authority which, in the UK, is as follows;

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
<https://ico.org.uk/make-a-complaint/> Tel: 0303 123 1113



12. UPDATES TO THIS PRIVACY POLICY

We will review and update our Privacy Policy periodically to ensure that it remains in accordance with data protection provisions. Users are advised to check the policy regularly, so you are aware of and happy with any changes made.

This Privacy Policy was last reviewed and updated on 20th May 2025.