

Cookie Policy

April 2016

What is a Cookie?

A cookie is a small file stored on your computer or mobile device after visiting a website. Cookies store information and help websites 'remember' you if you have visited the site before. More information on cookies and their use can be found at www.allaboutcookies.org.

Why do we use Cookies?

We use cookies to allow us to remember customers' preferences and understand what they like to look at on our site so that we can understand their needs and improve the service we offer. We do not store any personal or financial information in the cookies we use on our site; they are designed only to collect information of an anonymous nature. We work with third party networks who may use cookies and other technologies to provide reporting of traffic directed to this site.

By accessing and using our website, you agree to accept cookies and the terms of our Cookie Policy.

You can set your browser to block or disable cookies, but doing so will mean certain personalised features of our website cannot be provided to you.

Privacy Policy

February 2016

Any reference to “we” or “us” in this Privacy Policy shall mean Verastar Limited trading as Woav. This Privacy Policy applies to www.woav.co.uk (the “Site”) which is owned and operated by Verastar Limited. Our Privacy Policy is regularly reviewed to ensure that we continue to serve your privacy interests. We reserve the right to update this Privacy Policy from time to time, with any updates published on the Site. We therefore encourage you to review our Privacy Policy periodically for the most up to date information on our privacy practices. We will not however substantially change the way we use personal information you have already provided to us without the appropriate prior agreement.

For the purpose of the Data Protection Act 1998, the data controller is Verastar Limited.

If you have any questions regarding our Privacy Policy, please contact us at dataprotection@verastar.co.uk.

1. Why do we have this policy?

Your privacy is important to us, and we are committed to protecting your personal information from unauthorised use or disclosure. We will therefore use your personal information, or provide it to others, in accordance with this Privacy Policy. We are registered under the Data Protection Act 1998 in the United Kingdom as a data controller processing personal information.

Our Privacy Policy applies whenever you visit the Site, during the period you receive goods and/or services from us, or during the process of you applying for them, and afterwards.

2. Collecting your Information

We may hold information about you as a customer, or as a representative of a business customer. We collect this information in a number of ways:

- information is collected through your use of the Site and any applications;
- information is collected through your communications with us;
- information is collected via our networks when you use any of our services to enable us to provide the service, and to bill it;
- information is sometimes collected from outside sources, such as banks or credit reference agencies to help us with credit-related decisions.

In addition to the personal and financial information you submit or we collect, we

may also collect information about your computer including, where available, your IP address, operating system and browser type for the purposes of understanding your journey through, and access to, the Site and where improvements may be needed. This is statistical data about browsing patterns and actions and will not identify you. For details on the information collected in this way please see our Cookie Policy.

We may also record and/or monitor calls for quality checks or staff training. Call recordings may be used to help us detect, prevent or combat fraud.

3. Using your Information

We may hold and use the following information about you:

- your name, address, phone number(s), email address(es), date of birth, banking or financial details;
- information we received when making a decision about you (including any information collected from credit reference agencies);
- details and information about the goods and/or services you receive from us;
- information about when you contact us and when we contact you,

as well as any other information which we reasonably need to operate your account or make decisions about you (including regulatory decisions).

If a debit or credit card provided to us is identified as having been used fraudulently, we will maintain a record of its use for reporting and preventing fraud.

We may use your information to:

- provide the services you have requested, including operating and managing your account, enter into agreements for goods and/or services or corresponding with you;
- charge for the goods or service(s) we supply to you, such as broadband and/or calls;
- comply with our legal and regulatory obligations in connection with the provision of goods and/or services to you;
- check or confirm your identity if you contact us;
- provide you with personalised services;
- carry out, monitor and analyse our business;
- notify you of any changes to our products or services;
- contact you by email, SMS, letter, telephone or in any other way about our

products and services unless you tell us that you prefer not to receive marketing. An unsubscribe option will be included in appropriate communications;

- search credit reference agencies and fraud prevention agencies – if you apply for one of our services, it is important you read the section below “Credit Reference Agencies and Fraud Prevention Agencies”;
- identify, prevent, detect or tackle fraud, money laundering or other crimes;
- recover any debt you owe us;
- fulfil audit purposes, including auditing our website;
- fulfil other administration or operational purposes, including the testing of our systems.

Your data may be used for other purposes for which you give your permission, or where we are permitted to do so by law, or where it is in the public interest to disclose the information, or is otherwise permitted under the Data Protection Act 1998. The period of time for which we keep personal information depends on how long we are required to keep it by law (in some cases, the law requires us to keep information for a minimum period) or how we use the information. Unless required by law to keep it, we will keep information no longer than we need to for the purpose for which we collected it.

Keeping you in touch

We may use your information to contact you by email, SMS, letter, telephone (including voicemail) or other ways, and share it within the Verastar Limited group so that they can contact you in the same ways, about the range of products and services within the Verastar Limited Group portfolio. These services include:

- fixed line telecoms, broadband and mobile;
- water, gas and other energy services;
- directory enquiry services.

The Verastar Limited group of companies includes Clear Business Water Limited, Economy Gas Limited, 118777 Limited, Titan Telecom Limited and Sinq Power Limited. Where appropriate, we will ask for your agreement to this, and you can change your marketing contact preferences at any time – please see the “Contact Us” section below.

4. Sharing your Information

We will keep your personal information confidential and will only share it as set out in this Privacy Policy. If we do share your personal information, the companies we

share it with are contractually obliged to keep the personal information secure in accordance with our instructions and the Data Protection Act 1998.

We may share information about you:

- within the Verastar Limited group of companies to gain a picture of how you engage with the group overall;
- with anyone we use to help us to operate our business to collect payments or recover debts or to provide a service on our behalf, such as contractors, consultants, and advisers. We will put in place appropriate measures to ensure your personal information remains protected;
- with any person to whom we sell or transfer (or enter into negotiations with to sell or transfer) including their legal and professional advisers for this purpose, our business or any of our rights or obligations under any agreement we may have with you, or any part thereof. If the transfer or sale proceeds, the transferee or purchaser, and their group of companies, may use your personal information in the same way as explained in this Privacy Policy;
- with regulatory bodies, government authorities or ombudsmen schemes or other authorities to comply with our regulatory obligations and industry standards;
- with the police and any other investigatory authority where we consider it reasonable to do so in order to protect our business, premises, visitors and staff;
- with any individual or entity where we are required to do so by law (for example, pursuant to a court order).

If you become a customer of Verastar Limited, or apply for our products or services, we may also use and share information about you as follows:

- with any payment system we use;
- with credit reference agencies or fraud prevention agencies.

5. Credit Reference and Fraud Prevention Agencies

When you apply to us to open an account, we will check the following records about you and others:

- our own;
- those at credit reference agencies (CRAs). If you are a sole trader or in a partnership, we will treat your search as a "consumer" search, which means that when CRAs receive a search from us they will place a search footprint on your credit file that may be seen by other lenders. They supply to us both public (including the electoral register) and shared credit and fraud prevention information.

We will make checks such as: assessing your application for credit and verifying identities to prevent and detect crime and money laundering. We may also make periodic searches at CRAs to manage your account with us.

If you are a sole trader or are in a partnership and are making a joint application or tell us that you have a financial associate, we will link your records together so you must be sure that you have their agreement to disclose information about them. CRAs also link your records

together and these links will remain on your and their files until such time as a disassociation is successfully filed with the CRAs to break that link.

Information on applications will be sent to CRAs and will be recorded by them. This information may be supplied to other organisations by CRAs to perform similar checks and to trace your whereabouts and recover debts that you owe. Records remain on file for 6 years after they are closed, whether settled by you or defaulted.

If you give us false or inaccurate information and we suspect or identify fraud we will record this and may also pass this information to organisations involved in crime and fraud prevention.

If you do not make payments that you owe us and we are unable to resolve the outstanding debt with you via our usual debt collection correspondence, we may use CRAs to trace your whereabouts and recover debts.

We and other organisations may access and use from other countries the information recorded by fraud prevention agencies. 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 or where permitted under the terms of the Data Protection Act 1998.

You can contact the CRAs currently operating in the UK; the information they hold may not be the same so it is worth contacting them all. They will charge you a small statutory fee.

- Creditsafe, Bryn House, Caerphilly Business Park, Van Road, Caerphilly CF83 3GR or call 02920 886500
- CallCredit, Consumer Services Team, PO Box 491, Leeds, LS3 1WZ or call 0870 060 1414
- Equifax PLC, Credit File Advice Centre, PO Box 3001, Bradford, BD1 5US or call 0870 010 0583 or log on to www.myequifax.co.uk
- Experian, Consumer Help Service, PO Box 8000, Nottingham, NG80 7WF or call 0844 481 8000 or log on to www.experian.co.uk

6. Transfer of Information

We may transfer your information to other countries outside the UK, including outside the European Economic Area whose data protection laws may not be equivalent to those in the UK. If we do so, we will put in place appropriate measures for the protection of your personal information in such countries.

7. Security

Information provided through the Site is stored on our secure servers or those of any third party we engage to provide our IT platform.

Where we have given you, or you have chosen, a password which enables you to access certain parts of our site, you are responsible for keeping the password confidential and must not share it with anyone. You are responsible for any actions carried out using your password save

where there has been fraud. Whilst we will have appropriate measures in place to protect personal information you send to the Site, we cannot guarantee the security of the internet, so please refrain from sending us particularly private or sensitive details in free text fields, please only provide such details to the extent that specific data fields are provided.

8. Your Rights

Under the Data Protection Act 1998, you have the right to make a Subject Access Request, i.e. a right to be told whether we hold your personal information and, subject to certain exceptions, to be provided with a copy of such information. If you would like to make a Subject Access Request, please do so in writing to:

Subject Access Request,
Data Protection Officer,
Verastar Limited,
Longley House,
Longley Lane,
Manchester
M22 4SY.

Please note that a fee of £10 is payable per each Subject Access Request made. Should you wish to exercise this right against other Verastar Limited group companies, you will need to make a separate Subject Access Request for, and direct it to, each Verastar Limited group company you require.

9. Third Party Links

Our website may contain links to the websites of third parties. If you follow a link to any third party website, please note that these websites will have their own privacy policies and that we do not accept any responsibility or liability in respect of the same.

10. Contact Us

If you have any queries about this Privacy Policy or you wish to change your marketing preferences, you can contact us by emailing dataprotection@verastar.co.uk or by writing to us at:

Data Protection Officer,
Verastar Limited,
Longley House,
Longley Lane,
Manchester
M22 4SY.

Please help us to keep your records up to date by notifying us of any changes to your personal details.

woav.