

# Privacy Policy

This Privacy Policy explains how **Up North Fibre®**, a trading name of **Bletchley Networks Limited (Company No: 12091863)**, collects, uses, stores and protects personal data in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

By using our broadband services or our website, you agree to the practices described in this Privacy Policy.

## 1. Data controller

The data controller is:

### **Bletchley Networks Limited**

Collingwood Buildings, 38 Collingwood Street

Newcastle upon Tyne NE1 1JF

Email: [support@upnorthfibre.net](mailto:support@upnorthfibre.net)

Phone: 01434 614900

## 2. Personal data we collect

We collect and process the following categories of personal data:

- **Identity data:** name, account details, installation information.
- **Contact data:** address, email, telephone numbers.
- **Billing data:** payment details, invoices, transaction history.
- **Network data:** IP addresses, device identifiers, connection logs, usage patterns, network diagnostics (used to maintain and secure our broadband network).
- **Support data:** communications with customer support including call logs and emails.
- **Website usage data:** interactions with our website, gathered through cookies and analytics tools including Google Analytics.

## 3. How we use your personal data

We use personal data for the following purposes:

- To provide broadband and related services;
- To manage billing, payments and account administration;
- To support network maintenance, fault diagnosis and security;
- To comply with legal obligations (e.g., fraud prevention, court orders);
- To improve our website and digital services using analytics;
- To communicate important updates, service notices and operational messages.

## 4. Lawful bases for processing

We rely on the following lawful bases under the UK GDPR:

- **Contract:** to provide broadband services and fulfil our obligations.
- **Legitimate interests:** network security, fraud detection, service improvement.
- **Legal obligation:** complying with regulatory, tax, security and law enforcement requirements.
- **Consent:** where required for optional analytics and cookies.

## 5. Google Analytics

We use **Google Analytics** to understand how visitors use our website. This collects:

- IP addresses (anonymised where possible);
- Browser information and device type;
- Pages viewed, session duration and navigation paths;
- Approximate geographic location (non-precise).

Google Analytics uses cookies stored on your device. Data may be transferred outside the UK, but Google applies appropriate safeguards such as Standard Contractual Clauses (SCCs).

## 6. Cookies and cookie banner

Our website uses cookies to:

- Enable essential site functionality;
- Provide analytics through Google Analytics;
- Remember user preferences and improve browsing experience.

In accordance with **PECR**, we display a cookie acceptance banner on first visit. You may accept or reject non-essential cookies at any time. Essential cookies cannot be disabled as they are required for the site to function.

## 7. Data sharing

We may share data with:

- Network and infrastructure partners;
- Payment processors (for billing purposes);
- IT providers assisting with systems, hosting or security;
- Regulatory bodies or law enforcement when legally required.

We do not sell personal data to third parties.

## 8. Data retention

We retain personal data only as long as necessary for the purposes outlined above, including:

- Billing and tax records: minimum 6 years;
- Network logs: typically 12 months (may vary for security purposes);
- Support records: typically 24 months;
- Website analytics: in accordance with Google's retention controls.

## 9. Your rights

Under UK GDPR, you have the right to:

- Access your personal data;
- Request correction of inaccurate data;
- Request deletion of data in certain circumstances;
- Restrict or object to processing;
- Port your data to another provider;
- Withdraw consent where processing is based on consent.

To exercise these rights, contact: **support@upnorthfibre.net**.

## **10. Data security**

We take appropriate technical and organisational measures to protect personal data against loss, misuse, unauthorised access, alteration or destruction.

## **11. International transfers**

Some service providers (including Google) may process data outside the UK. We ensure appropriate safeguards are in place, including Standard Contractual Clauses and equivalent protections.

## **12. Complaints**

If you have concerns about how your data has been handled, please contact us first. You also have the right to complain to the **Information Commissioner's Office (ICO)**:

[www.ico.org.uk](http://www.ico.org.uk)

Telephone: 0303 123 1113

## **13. Updates to this Privacy Policy**

We may update this Policy from time to time to reflect legal, technical or business changes. The latest version will always be published on our website.