

## 1. INTRODUCTION

- 1.1 Welcome to the Six Degrees Holdings Limited's ("6DG") privacy notice.
- 1.2 6DG respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.
- 1.3 Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

## 2. IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this privacy notice

- 2.1 This privacy notice aims to give you information on how 6DG collects and processes your personal data through your use of this website, including any data you may provide through this website, or as a result of your dealings with us as a customer or a supplier.
- 2.2 This website is not intended for children and we do not knowingly collect data relating to children.
- 2.3 It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### Controller

- 2.4 We are a provider of IT services, including managed cloud hosting, co-location services in our data centres, connectivity and unified communications. We are part of the Six Degrees Group of companies, and our parent company is Six Degrees Holdings Limited (Company number: 07473012) whose registered offices are at Commodity Quay, St. Katharine Docks, London, E1W 1AZ.
- 2.5 Six Degrees Holdings Limited is made up of different legal entities. This privacy notice is issued on behalf of the Six Degrees Group so when we mention "6DG", "Six Degrees", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Six Degrees Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. Six Degrees Holdings Limited is the controller and responsible for this website.
- 2.6 The information that we collect and use about you are regulated by the General Data Protection Regulation which applies across the European Union, including in the United Kingdom.



2.7 We have appointed a data privacy team responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights or if you wish to contact our Data Protection Officer, please contact [privacy@6dg.co.uk](mailto:privacy@6dg.co.uk).

2.8 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### [Changes to the privacy notice and your duty to inform us of changes](#)

2.9 This version was last updated on 23/01/2023.

2.10 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

#### [Third-party links](#)

2.11 This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### [3. THE DATA WE MAY COLLECT ABOUT YOU](#)

3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. The General Data Protection Regulation does not apply to anonymous data as this does not permit the identification of an individual and it is, therefore, excluded from the scope of this privacy notice.

3.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped in the following categories:

- (a) **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender;
- (b) **Contact Data** includes billing address, delivery address, email address and telephone numbers;
- (c) **Financial Data** includes bank account and payment card details;
- (d) **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us;
- (e) **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website;



- (f) **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedbacks and survey responses;
- (g) **Usage Data** includes information about how you use our website, products and services;
- (h) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

3.3 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but it is excluded from the scope of the General Data Protection Regulation as it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be processed in accordance with this privacy notice and the relevant data protection legislation.

3.4 We do not collect any **Special Categories of Personal Data** 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 data). Nor do we collect any information about criminal convictions and offences.

#### [If you fail to provide personal data](#)

3.5 Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## [4. HOW IS YOUR PERSONAL DATA COLLECTED?](#)

4.1 We use different methods to collect data from and about you, including through:

- (a) **Direct interactions** - You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - (i) Apply for our products or services;
  - (ii) Create an account on our website;
  - (iii) Subscribe to our services or publications;
  - (iv) Request marketing material to be sent to you;
  - (v) Enter a competition, promotion or survey;
  - (vi) Give us some feedback;



- (vii) Provide details on an events registration page;
- (viii) Provide your details via an event registration device or scanner.
- (b) **Automated technologies or interactions** - As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see [Cookies](#) for further details.
- (c) **Third parties or publicly available sources** - We may receive personal data about you from various third parties and public sources as set out below:
  - (i) Analytics providers such as Google based outside the EU;
  - (ii) Search information providers inside the United Kingdom.
- (d) Contact, Financial and Transaction Data from providers of technical, payment and delivery services inside the EU.
- (e) Identity and Contact Data from data brokers or aggregators inside the United Kingdom.
- (f) Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- (g) Identity and Contact Data from LinkedIn and LinkedIn Sales Navigator.

## 5. HOW WE USE YOUR PERSONAL DATA

- 5.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
- (a) To register you as a new customer;
  - (b) To process and deliver your order;
  - (c) To manage our relationship with you;
  - (d) To enable you to partake in a prize draw, competition or complete a survey;
  - (e) To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
  - (f) To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you;
  - (g) To use data analytics to improve our website, products, services, marketing, customer relationships and experiences;
  - (h) To make suggestions and recommendations to you about goods or services that may be of interest to you.



5.2 Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

5.3 We do not conduct automated decision making and profiling.

#### [Our legal basis for using your personal data](#)

5.4 When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases on which we may rely, depending on what personal information we process and why.

5.5 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we the data is collected. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

5.6 The legal basis we may rely on include:

- (a) **Consent** - where you have given us clear consent for us to process your personal information for a specific purpose;
- (b) **Performance of a Contract** - processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract;
- (c) **Legal Obligation** - where our use of your personal information is necessary for us to comply with a legal or regulatory obligation that we are subject to (not including contractual obligations);
- (d) **Legitimate Interest** - where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

#### [Marketing](#)

5.7 We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established an [unsubscribe process here](#). You have the right to withdraw consent to marketing at any time by [contacting us](#).

5.8 For cases where you may have objected to marketing, we have a legal obligation to hold some personal data, albeit limited, to ensure no more marketing is sent to you.

#### [Promotional offers from us](#)

5.9 We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.



- 5.10 You will receive marketing communications from us if you have requested information, submitted a form on our website, purchased goods or services from us or if you have provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out from receiving that marketing communication.

#### Marketing events

- 5.11 If you register with us during a marketing event or a price draw competition, we may use your details to contact you after the event and ask for your feedback. Beyond that, we may use your data to contact you with information about other events and services that we think you may be interested in.
- 5.12 We will not pass your details to any third party for marketing purposes.

- 5.13 You can change your preferences at any time on our website by following our [unsubscribe process](#).

#### Third-party marketing

- 5.14 Prospect Global Ltd is one of our digital marketing agents that conduct marketing activities on our behalf:
- (a) Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: [dpo@sopro.io](mailto:dpo@sopro.io)."

#### Opting out

- 5.15 You can ask us or our third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.
- 5.16 Where you opt out from receiving these marketing messages, the personal data provided to us as a result of a product/service purchase, product/service experience or other transactions will not be affected.

#### Cookies

- 5.17 A cookie is a small text file which is placed onto your device when you navigate and interact with our website. These cookies help us make the website function properly and more securely, provide better user experience, and allow us to understand how the website performs and to determine where improvement is needed.
- 5.18 The Six Degree website uses some unobtrusive cookies to store information on your computer. Some cookies on this site are essential, and the site won't work as expected without them. These cookies are set when you submit a form, login or interact with the site by doing something that goes beyond clicking on simple links.



- 5.19 We also use some non-essential cookies to anonymously track visitors or enhance your experience of the site. If you're not happy with it, please adjust your browser settings to reject these cookies.
- 5.20 We may use the following types of cookies:
- (a) **Essential** - some cookies are essential for you to be able to experience the full functionality of our site. They allow us to maintain user sessions and prevent any security threats. They do not collect or store any personal information. For example, these cookies allow you to log-in to your account and add products to your basket and checkout securely;
  - (b) **Statistics** - these cookies store information like the number of visitors to the website, the number of unique visitors, which pages of the website have been visited, the source of the visit etc. These data help us understand and analyse how well the website performs and where it needs improvement;
  - (c) **Marketing**- our website displays advertisements. These cookies are used to personalize the advertisements that we show to you so that they are meaningful to you. These cookies also help us keep track of the efficiency of these ad campaigns;
  - (d) **Functional** - these are the cookies that help certain non-essential functionalities on our website. These functionalities include embedding content like videos or sharing contents from the website on social media platforms;
  - (e) **Preferences** - these cookies help us store your settings and browsing preferences (e.g. like language preferences) so that you have a better and efficient experience for future visits to the website.
- 5.21 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

#### [Change of purpose](#)

- 5.22 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).
- 5.23 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 5.24 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **6. DISCLOSURE OF YOUR PERSONAL DATA**

- 6.1 We may have to share your personal data with:



- (a) **Internal Third Parties** - the companies in the Six Degrees Group as well as our parent company based in the USA which undertakes management reporting;
- (b) **External Third Parties** – this definition includes the following:
  - (i) Service providers acting as processors based in the United Kingdom, Europe and the USA who provide IT services to us for our own internal business purposes and to our customers, as our sub-contractors;
  - (ii) Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services;
  - (iii) HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances;
  - (iv) Market research agencies, recruitment companies and fraud prevention agencies.
- (c) Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

6.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 7. INTERNATIONAL TRANSFER

7.1 We may transfer personal data outside the UK and EEA when product and services are provided by external third-party suppliers and the processing of personal data is necessary for the performance of a contract.

7.2 Whenever we transfer your personal data outside the UK and EEA, we ensure at least one of the following safeguards is implemented:

- (a) We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection of personal data by the European Commission. For further details, see [European Commission - Adequacy Decisions](#).
- (b) Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission - Standard Contractual Clauses](#).





- 7.3 Please [contact us](#) if you would like further information on the specific mechanism used by us when transferring your personal data outside the UK.
- 7.4 **Our EEA GDPR Representative.** As we do not have an establishment in the EEA, we have appointed a representative based in Ireland, who you may address if you are located in the EEA to raise any issues or queries you may have relating to our processing of your Personal Data. Our EEA representative is: DLI Corporate Nominees Limited and is located at 31 Morehampton Road, Donnybrook, Dublin 4, Ireland. Our EEA representative can be contacted directly by emailing them at the following address: [privacy@dlicorp.ie](mailto:privacy@dlicorp.ie)
- 7.5 **Our EEA NIS Representative.** As we do not have an establishment in the EEA, we have appointed a representative based in Ireland, who you may address if you are located in the EEA to raise any issues or queries you may have relating to our obligations in respect of the requirements set out in the EU Network and Information Security directive (NIS Directive). Our EEA NIS Directive representative is: DLI Corporate Nominees Limited and is located at 31 Morehampton Road, Donnybrook, Dublin 4, Ireland. Our EEA representative can be contacted directly by emailing them at the following address: [privacy@dlicorp.ie](mailto:privacy@dlicorp.ie)

## 8. DATA SECURITY

- 8.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data according to our instructions and they are subject to a duty of confidentiality.
- 8.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. DATA RETENTION

### [How long will you use my personal data for?](#)

- 9.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 9.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 9.3 Details of retention periods for different types of personal data are available in our retention policy which you can request from us by [contacting us](#).
- 9.4 In some circumstances you can ask us to delete your data: see Request erasure below for further information.



- 9.5 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes. In these situations, we may use this information indefinitely without further notice to you.

## 10. YOUR LEGAL RIGHTS

- 10.1 Under the General Data Protection Regulation, you have a number of important rights, including:
- (a) **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
  - (b) **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
  - (c) **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
  - (d) **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
  - (e) **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend a legal claim; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
  - (f) **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
  - (g) **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out



before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- 10.2 If you wish to exercise any of the rights set out above, please [contact us](#).

[No fee usually required](#)

- 10.3 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

[What we may need from you](#)

- 10.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you further information in relation to your request to speed up our response.

[Time limit to respond](#)

- 10.5 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or if you have made a number of requests. In this case, we will notify you and keep you updated.