

PRIVACY POLICY

About us & our Privacy Policy:

www.11850.ie (the **Website**) and **11850 (directory enquiries via telephone in Ireland)** is operated by **Conduit Enterprises, Ltd**, (Company No: 244275 ; Registered office: 22 Northumberland Road, Ballsbridge, Dublin 4) (**Conduit** or **we, us** or **our**). We are part of the **kgb** group of companies, which includes **The Number UK Ltd, 118 118 Money** and **Conduit Global**, all together the **Group**.

The Group operates two other directory enquiries services on 11860 and 11888 as well as other directory enquiries services operated on behalf of partners. Conduit Enterprises Ltd also operates a Customer Care phone number on 1800 923 433. This policy applies to all services listed.

If you wish to contact our Data Protection Officer, please contact them via dpo@11850.ie, Other ways to get in touch with us are set out in the **Contacting us** section below.

Protecting your personal information:

Personal information about you is protected by law which includes the General Data Protection Regulation (GDPR) and the Data Protection Bill 2018.

The law regulates how we may process personal information relating to you and grants you various rights in respect of your personal information.

The aim of this Policy is to tell you how we will collect, use and retain any personal information you provide to us.

What the law says:

Under data protection law, we can only use your personal information if we have a lawful reason to do so. We must have one or more of the following lawful reasons:

- ✓ We have your consent;
- ✓ We are entering into or are performing a contract with you;
- ✓ It is in our legitimate interests;
- ✓ We are under a legal duty.

When we rely on our **legitimate interests** we mean our:

- pursuit of our commercial activities and objectives, or those of a third party;
- compliance with applicable legal and regulatory obligations and any codes of conduct;
- improvement and development of our business operations and service offering, or those of a third party; or
- protection of our business, shareholders, employees and customers, or those of a third party.

What is personal information?

Personal information is information about you and other individuals. It is information which identifies you such as your name, address, telephone number and email address. The personal information which we collect about you includes any:

- personal information included in communications between us (including telephone calls and e-mails);
- recordings of calls between us where calls may have been recorded for quality and training purposes; and
- telephone numbers recorded when you contact us to use our services

We also collect (automatically) some information about your device when you visit the Website. For example, we will collect session data, including your IP address, Web browser software, and referring website. We may also collect information about your online activity such as content viewed and pages visited. To the extent that this information constitutes personal information, its use by us will be covered by this Policy.

Who is responsible for the personal information we collect?

Conduit Enterprises Ltd is the data **controller** for the purposes of the GDPR. This is because we dictate the purpose for which your personal information is used and any personal information you give us about other individuals.

How we collect and use your personal information:

You do not have to give us any personal information in order to use our Website, however, when you call us via 11850 or on any of the other numbers listed then we will collect your telephone number (CLI = caller line identification) unless you choose to withhold it before you call.

In some circumstances we may need to collect your personal information for example, by law or to perform a contract with you. If you decide not to give us your personal information, we may not be able to fulfil our obligations.

References to **you** in this Policy mean the person who is using our Website or calling our directory enquiries services by telephone

We have set out our reasons for using your personal information in the table below under the heading **Legal Basis**. Where we rely on our legitimate interests, we have set out those interests in the table below.

You have the right to object to our use of your personal information at any time. A summary of your right to object and details of who to contact if you want to exercise this right can be found at the **Contacting us** section below.

For further information on your rights please see the **Your Rights** section below.

Purpose	Legal Basis
<p>To communicate with you and other individuals:</p> <ul style="list-style-type: none"> ➤ In emails, SMS and telephone calls (which we may record and/or monitor for quality checks and staff training); ➤ Please note that these recordings may also be used to help us combat fraud, in customer surveys, through our Group company websites, resolve complaints, provide refunds and collect customer opt-in consent; 	<p>Consent, performance of a contract we have with you and/or legitimate interests: we require your personal information in order for you to receive our products and services</p>

Purpose	Legal Basis
<p>To manage your relationship with us (including to keep a record of the products and services you order from us).</p>	<p>Performance of a contract we have with you and/or Legitimate interests: we require your personal information in order for you to receive our products and services</p>
<p>To improve the quality of our service including:</p> <ul style="list-style-type: none"> ➤ To train our personnel; ➤ To assess the quality of our products and services; ➤ To measure interest in and improve our products, services and the Website; ➤ To help us to understand the interests of our users and customise your user experience (for example using information we collect automatically); and ➤ Recording our telephone calls with you for training and quality control purposes. 	<p>Legitimate interests: we require your personal information in order for you to receive our products and services for us to improve the products and services provided to you.</p>
<p>To comply with legal and regulatory obligations and to prevent potentially prohibited or illegal activities.</p> <p>We will:</p> <ul style="list-style-type: none"> ➤ Administer, update, consolidate, improve and manage the accuracy of our records and our business including meeting legal, regulatory and compliance requirements and operating rules (such as anti-money laundering, regulatory reporting requirements and record maintenance); and ➤ Monitor and analyse the use of the Website to detect, prevent, investigate, prosecute and/or report fraud, terrorism, misrepresentation, security incidents or crime. 	<p>Necessary for compliance with a legal obligation to which we are subject.</p>
<p>To enforce our terms of use or any contract we have with you.</p>	<p>Legitimate interests: to enforce our legal rights and protect our business interests.</p>
<p>To investigate and respond to any complaints, refund requests, feedback and queries and handle/resolve disputes.</p>	<p>Legitimate interests: to enable us to deal with any issues you may have in relation to our products and services.</p>

Purpose	Legal Basis
<p>If you download our mobile application(s) or use our Website, we may collect information about your use of them including, where available:</p> <ul style="list-style-type: none"> ➤ your IP address; ➤ operating system and browser type; and ➤ the type of device(s) you use (we use this information for system administration, fraud prevention and product development). 	<p>Performance of a contract we have with you and our legitimate interests to enable you to receive our products and services in certain formats.</p>

Your personal information will be held securely so that we and any other companies in our Group that you have dealings with, either now or in the future, can manage your relationship with us.

This will include personal information you provide when communicating with our agents and or filing a complaint.

Who do we share your personal information with?

Our Group companies

By sharing your personal information it enables us, and other companies within our Group, and our service providers and agents to better understand your needs. We will always treat your personal information as private and confidential.

Our other service providers and agents

We will share your personal information with:

- third parties who carry out hosting, maintenance, call centre operation, or provide other services in relation to the Website or the operation of the directory enquiry service by telephone;
- our suppliers of telecommunication services
- business process outsourcing providers;
- The Office of the Revenue Commissioners or other authorities (including, without limitation, Comreg)
- third parties where we are required to do so by law (for example, we are required to screen applications that are made to us to ensure we are complying with the international fight against terrorism and other criminal activities) or by regulatory bodies such as the Financial Conduct Authority or if we require or are required by others to investigate or prevent crime (this may include foreign authorities to help them in their fight against crime and terrorism);
- third parties who may be connected with you.

We will also share your personal information:

- with any person to whom we sell, merge or transfer (or enter into negotiations to sell, merge or transfer) our business or part or all of our business or assets or enter into a merger with it;

- to a potential buyer, transferee, or merger partner or seller and their advisers so long as they agree to keep it confidential and to use it only to consider the possible transaction; and
- if the transaction goes ahead, the buyers, transferee or merger partner may use or disclose your personal information in the same way as set out in this Policy.

We will always ensure your information remains safe and secure.

Why we may process special categories/sensitive personal information about you:

Some personal information under data protection law has special protection. This information is known as **special categories of personal information** but it may also be called **sensitive personal information**. This type of personal information includes information which relates to your racial or ethnic origin, political opinions, religious beliefs or philosophical beliefs, trade union membership, genetic or biometric data or data concerning your health, sex life or sexual orientation.

If we collect this type of personal information, we will only do so to provide the product or service you require or help to manage your products and services.

If we need to obtain **special categories of personal information**, we will ask for your explicit consent first. For example, in order to process various refunds, our Customer Care team may ask for evidence (eg a doctor's letter) if the customer claims that it was his/her illness that had an impact on the number of calls made. We will always ask for your explicit consent prior to collecting such information,

Where will we transfer your personal information?

There will be times when we share your personal information within our Group and with our third party providers who are located in countries outside of the European Economic Area (EEA).

Your personal information will be transferred to countries outside the EEA (such as the USA and the Philippines) that do not have a similar standard of data protection laws to the UK. When we transfer your personal information outside the EEA, we will take reasonable steps to ensure that your personal information is protected. To do this we use a set of standard data protection clauses which have been approved by the European Commission.

The above approach is compliant with data protection law (being Article 46.2 of the GDPR). For further information about these transfers and the safeguards in place, please get in touch via the [Contacting us](#) section below.

Retention of your personal information

How long we keep your information for depends on the basis on which it was provided.

Generally, however, we will keep the information that is necessary to enable us to provide you with the products or services you have requested through the telephone directory enquiries services for as long as it takes us to provide that product or service and in support of the need for business records of our interactions.

We will keep records of any transactions or communications you enter into on this website or via the numbers listed for a minimum of 6 years from the date of the communication. This is so that we can respond to any complaints or disputes that arise in that period and to ensure that we have the appropriate business records to manage our relationship with you as our customer.

If your call to the numbers listed has been recorded and saved for quality and training purposes, it will be kept for 2 years from the date of the call.

If you would like to know more about how long we hold your personal information please get in touch using the **Contacting Us** section below.

Your rights

You have certain rights with respect to your personal information. The rights will only apply in certain circumstances and are subject to certain exemptions.

Please see the table below for a summary of your rights and who to contact to exercise them.

Your rights	What this means	Who to contact
Right of access to your personal information	You have the right to receive a copy of your personal information that we hold about you, subject to certain exemptions.	dpo@11850.ie
Right to rectify your personal information	You have the right to ask us to correct your personal information that we hold where it is incorrect or incomplete.	dpo@11850.ie
Right to erasure of your personal information	You have the right to ask that your personal information be deleted in certain circumstances. For example: <ul style="list-style-type: none"> ➤ where your personal information is no longer necessary for the purpose(s) it was collected or otherwise used; ➤ if you withdraw your consent and there is no other legal reason to permit us to continue to use your personal information; ➤ if you object to the use of your personal information (see below); ➤ if we have used your personal information unlawfully; or ➤ if your personal information needs to be erased to comply with a legal obligation. 	dpo@11850.ie
Right to restrict the use of your personal information	You have the right to suspend our use of your personal information in certain circumstances. For example: <ul style="list-style-type: none"> ➤ where you think your personal information is inaccurate; 	dpo@11850.ie

Your rights	What this means	Who to contact
	<ul style="list-style-type: none"> ➤ the use of your personal information is unlawful but you don't want us to delete it; ➤ we no longer need your personal information, but your personal information is required by you for the establishment, exercise or defence of legal claims; or ➤ you have objected to the use of your personal information and we are verifying whether our grounds for the use of your personal information override your objection. 	
<p>Right to data portability</p>	<p>You have the right to obtain your personal information in a structured, commonly used and machine-readable format and for it to be transferred to another organisation, where it is technically feasible.</p> <p>This right only applies:</p> <ul style="list-style-type: none"> ➤ to personal information you have provided to us; ➤ where the use of your personal information is based on your consent or for the performance of a contract; and ➤ when the use of your personal information is carried out by automated (i.e. electronic) means. 	<p>dpo@11850.ie</p>
<p>Right to object to the use of your personal information (including to object to direct marketing, automated profiling and decision making)</p>	<p>You have the right to object to the use of your personal information in certain circumstances. For example:</p> <ul style="list-style-type: none"> ➤ where you have grounds relating to your particular situation and we use your personal information for our legitimate interests (or those of a third party); ➤ if you object to the use of your personal information for direct marketing purposes; and ➤ where we use your personal information to take a decision based solely on automated 	<p>dpo@11850.ie</p>

Your rights	What this means	Who to contact
	processing where that decision produces a legal effect or otherwise significantly affects you.	
Right to withdraw consent	You have the right to withdraw your consent at any time where we rely on consent to use your personal information.	dpo@11850.ie
Right to complain to the relevant data protection authority	You have the right to complain to the Data Protection Commission (DPC), where you think we have not used your personal information in accordance with data protection law.	Contact the ICO: <ul style="list-style-type: none"> • ICO Telephone: 1890 252 231 • ICO website: www.dataprotection.ie

Links to third party websites:

The Website contains links to other websites over which we have no control.

We are not responsible for privacy policies or practices of other websites to which you choose to link from the Website. We encourage you to review the privacy policies of those other websites so you can understand how they collect, use and share your information.

Marketing:

We do not perform any direct marketing. We do not sell or provide your personal data to any third party marketing companies.

The operation of our directory enquiries services:

Conduit Enterprises Ltd has appointed a sub-contractor, Vericall, to perform the day-to-day operational management of all the numbers listed, which includes the recordings of calls of your interactions with their call centre agents.

The listings data provided to you when you call 11850 is now provided solely by Vericall. Vericall will also receive your CLI (telephone number) in order to be able to provide you with the directory enquiries service.

Vericall are the first point of call for any complaints about the 118 numbers listed, These may be escalated to Conduit and any personal data contained within the complaint (name, email address, telephone number, etc.) you make is protected by appropriate technical security measures.

Any refunds are managed by Vericall, any of a value over €10 are required to be approved by Conduit, and any personal data required to approve the refund is protected by appropriate technical security measures.

VeriCall Limited are a company incorporated in England and Wales (Registered No. 10921629) with its registered office at Cotswold House, 219 Marsh Wall, London, E14 9FJ. VeriCall's Privacy Policy can be found at <https://vericallsolutions.com/index.php/privacy-policy/>

Cookies:

We use cookies on our website (www.11850.ie) to distinguish you from other users of the website. This helps us to provide you with a good experience when you browse the Website and also allows us to improve the Website.

For information on the cookies we use and the purposes for which we use them, please see our [Cookie Policy](#).

Changes to this Privacy Policy:

If our Privacy Policy changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures that you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

Where appropriate we will give you reasonable notice of any changes.

This Privacy Policy was last updated in June 2020.

Contacting us:

If you have any questions about this Policy or your personal information and/or if you wish to see what information we hold about you, please contact the Data Protection Officer on dpo@11850.ie

If you no longer wish to receive any marketing communications or wish us to stop using your personal information, please contact us:

By phone: 1800 923 433 which is free from Irish landlines and mobiles.

By email: dpo@11850.ie

How to complain:

If you think there is a problem with how your personal information is being handled, you have a right to complain to the Data Protection Commission (**DPC**).

The DPC can be contacted on 1890 252 231 or please visit their website at www.dataprotection.ie