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## Digital Mobile Spectrum Limited: privacy policy

This privacy policy explains who we are, how we obtain and use personal information about you, why we are allowed to do so by law, who has access to your personal information and what your rights are. Please review it carefully. You can click on the following links to find out more about:

1. Change to data protection legislation
2. Who we are
3. What personal information we collect and why
4. How we use your personal information
5. Who we share your personal information with and where it is stored
6. Legal grounds for using your personal information
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You have the right to object to us using your personal information for our organisation's legitimate purposes. For more information about our organisation's legitimate purposes for using your personal information, and your rights and how you can exercise them, please see the sections [legal grounds for using your personal information](#) and [your rights](#).

### Data protection

We are committed to protecting your personal information. We will always keep your personal information safe and comply with applicable data protection legislation when using your personal information. This privacy policy explains how we will do that.

### Who we are

We are Digital Mobile Spectrum Limited, a private limited company incorporated in (and subject to the laws of) England and Wales, with registration number 08247385. Our registered address is at 24/25 The Shard, 32 London Bridge Street, London, SE1 9SG, UK. In this privacy policy, Digital Mobile Spectrum Limited is also referred to as "DMSL", "Restore TV", "at800", "we", "us" or "our". We are the "controller" of the personal information you provide to us.

### What personal information we collect and why

Personal information is any information which identifies you personally whether directly (for example, your name) or indirectly (for example, information about your use of our service). Our commitment to the UK's television viewers requires us to use various information about you as a viewer to help us resolve the interference issues you may be experiencing. We collect the following information from you: **Your name:** This allows us to refer to you when speaking to you and to address any post we may need to send to you specifically (filters, for example). You can choose not to provide your name (you will instead be referred to as a "householder") and this will not affect the service we provide to you. **Your telephone number:** This is needed to enable us to communicate with you. For example, we may need to call you back to rearrange an engineer appointment, or if we get disconnected from you. We may also call you to ask how you rate the service we have provided to you, but will only do so if you tell us that you're happy to be surveyed in such a way. **Your address:** We need your address to estimate how much television interference you may be

experiencing and to establish whether your issue can be resolved by us. We also use your address to communicate with you and, if you are eligible, to send you filters. In addition, if you are eligible for engineer support, we require your address so that we can send our engineers to your property to try to resolve your issue. **Your email address:** If you choose to get in touch with us by completing the online form on our website, we will need you to provide us with your email address so that we may respond to your enquiry. **Information about your TV issues:** We ask you for information about your TV set-up and the interference issues you are facing. We use this information to diagnose more accurately the possible cause of your viewing issues so that we can prescribe an appropriate solution. **Information about any needs you may have for additional assistance** (which may include information concerning your health): We may ask whether you have any needs for additional assistance that you would like us to take into account. This will help us tailor our services to you. For example, if you tell us that you have impaired mobility, we can instruct our engineers to wait longer for you to answer the door; if you suffer from hearing difficulties, this is useful for us to be aware of when speaking to you. You don't have to provide this information to us; you can choose not to do so, and it won't prevent us from providing help to you. **Your social media username:** If you choose to get in touch with us via Facebook or Twitter, your username and any conversations will be stored by Facebook or Twitter according to their own terms of use. DMSL, and the third parties with which we work may use third party applications, such as Conversocial, to help manage social media conversations and interact with you on social media. In some instances, tools such as these may store these conversations within their own applications, under the licences that they have signed up to with the various social media providers. We also obtain information about you from other organisations that we work with, as well as their suppliers unless you have asked those organisations not to share your information. These are detailed in the table below.

Third party	What information might be shared	Why the information might be shared	Link to third party's privacy policy
Freeview	Name, address, phone number, email address, TV set-up, nature of the issue.	To allow us to get in contact with you and to help us diagnose any TV interference you may be experiencing.	<a href="https://www.freeview.co.uk/privacy-notice">https://www.freeview.co.uk/privacy-notice</a>
BBC's Radio & TV Investigation Service	Name, address, phone number, email address, TV set-up, nature of the issue.	To allow us to get in contact with you and to help us diagnose any TV interference you may be experiencing.	<a href="http://www.bbc.co.uk/privacy">http://www.bbc.co.uk/privacy</a>
DCMS	Name, address, phone number, email address, TV set-up, nature of the issue.	To allow us to get in contact with you and to help us diagnose any TV interference you may be experiencing.	<a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>
Ofcom	Name, address, phone number, email address, TV set-up, nature of the issue.	To allow us to get in contact with you and to help us diagnose any TV interference you may be experiencing.	<a href="https://www.ofcom.org.uk/">https://www.ofcom.org.uk/</a>

Telefónica UK (O2)	Name, address, phone number, email address, nature of the issue.	To allow us to get in contact with you and to help us diagnose any TV interference you may be experiencing.	<a href="https://www.telefonica.com/en/data-protection-policy">https://www.telefonica.com/en/data-protection-policy</a>
Vodafone	Name, address, phone number, email address, nature of the issue.	To allow us to get in contact with you and to help us diagnose any TV interference you may be experiencing.	<a href="https://www.vodafone.co.uk/privacy">https://www.vodafone.co.uk/privacy</a>
Three UK	Name, address, phone number, email address, nature of the issue.	To allow us to get in contact with you and to help us diagnose any TV interference you may be experiencing.	<a href="http://www.three.co.uk/terms-conditions">http://www.three.co.uk/terms-conditions</a>
EE	Name, address, phone number, email address, nature of the issue.	To allow us to get in contact with you and to help us diagnose any TV interference you may be experiencing.	<a href="https://ee.co.uk/eeprivacycentre">https://ee.co.uk/eeprivacycentre</a>
MPs and local councillors	Name, address, phone number, email address, nature of the issue.	To allow us to get in contact with you and to help us diagnose any TV interference you may be experiencing.	<a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>
Communications and Internet Services Adjudication Scheme (CISAS)	Name, address, phone number, email address, nature of the issue.	To allow us to get in contact with you and to discuss any concerns you have about the service you have received.	<a href="https://www.cedr.com/consumer/general/privacy/">https://www.cedr.com/consumer/general/privacy/</a>

Cookies: When using our website, we use cookies. These are essentially small text files that are stored on your device. They assist with your use of our website and enable us to distinguish you from other users so that we can understand how you navigate through our website. Please see our [Cookie Policy](#) to find out more.

### How we use your personal information

We use your personal information for the following purposes: **To communicate with you about the television interference issues you may be experiencing.** We use your name (if you have chosen to provide it to us), contact details and information about your TV issues when we communicate with you regarding the interference you are experiencing. We use a range of channels to communicate with viewers. While our primary channel of communication is by telephone, you can also contact us by email or post, by completing an online form on our website or by using Twitter or Facebook. **To provide you with a free filter.** If you are eligible for a free filter and require this to resolve your interference issues, we send it to the address you have provided to us. We will address this post to you personally if you have provided us with your name (otherwise it will be addressed to the “householder”). **To provide you with engineer support.** If you are eligible for engineer support and require this to resolve your interference issues, we use your name (if you have chosen to provide it

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to us), contact details and information about your TV issues so that we can arrange for an engineer to attend your property. We share this information with our engineers so that they can address themselves to you personally and locate your property (and call you if they are having trouble getting to your home or to let you know when you can expect them). **To provide you with additional assistance taking into account any particular needs you have.** If you have provided your consent, we use any sensitive information you provide to us (for example, concerning your health, such as whether you have a disability) so that we can interact with you in an appropriate manner and provide you with a better overall service (for example, if you have hearing difficulties, by speaking more slowly and loudly on the telephone with you). If you require engineer support and you would like our engineers to take into account any sensitive information you have provided to us when they attend your property (for example, if you have impaired mobility and need our engineers to wait a little longer for you to answer the door), we will share this information with them as well, but only where you have provided your consent for us to do so. Please note that we do not need any sensitive information (for example, concerning your health) in order to provide our services and you can choose not to provide it. **To conduct quality checks of engineer works.** We may contact you up to three months after the date that our engineers last attended your property to arrange a visit by our representatives to check the quality of any work undertaken. If you confirm that you consent for our representatives to do this, we will share your name (if you have chosen to provide it to us), contact details and information about your previous TV issues with them to complete the quality check. **To conduct customer satisfaction surveys.** When we provide you with a support service, we will ask whether you consent to be contacted to ask questions about the service you have received. If you have provided your consent, we may contact you to ask how satisfied you are with our service. We use the information you provide to help us improve our services. **To better understand the effectiveness of our emails.** We use technology within emails we send to MPs, local councillors, housing and charity-based organisations to find out whether and when the emails are opened, and whether links to our website contained within the emails are clicked. We use this information to understand the effectiveness of our email communications so that we can improve this in the future. **To maintain our records and improve data accuracy.** Like any organisation, we review and update personal information in the course of maintaining our internal records and ensuring they are correct. To respond to complaints and disputes The personal information we hold about you helps us respond to any complaints you have made, or deal with any dispute that may arise in the course of us providing our services to you, in the most effective manner. **To comply with our legal obligations.** In certain circumstances, we use your personal information only to the extent required in order to enable us to comply with our legal obligations, including sharing your personal information with law enforcement agencies, regulators, courts or other public authorities if required to do so by law.

### **Who we share your personal information with and where it is stored**

To fulfil our commitment to you, we work with several third-party organisations which perform certain tasks on our behalf. For example, we use several other organisations to:

- manage our customer calls;
- provide our engineers;
- send out our filters; and
- handle our social media and public relations.

We share your personal information with these third parties only to the extent necessary in order to enable them to provide the service you require on our behalf. These third parties act on our instructions and are “processors” of your personal information. In addition, we may disclose your personal information:

- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to protect the rights, property or safety of our organisation, our customers or others; and
- to successors in title or replacement operators of all or part of our organisation, subject to the data being used for the same purposes as originally specified.

The table below sets out details of the third parties to whom we disclose your personal information, and how they will use it. These organisations may only transfer your data outside of the European Economic Area if they act in accordance with our instructions and apply appropriate safeguards (for instance, use of EU model clauses) to do so. This information may be updated from time to time, but we will always obtain similar assurances in the event that we disclose your personal information to third parties.

Name of recipient	Personal Information shared	Why your personal information is shared
Paragon Group Limited	Name and address.	Your name will be used when sending at800 filters to you through the post.
SCCI	Name, address and phone number. Any personal circumstance details you have chosen to share.	To allow us to send an engineer to visit your property to diagnose interference problems.
Crystal Electronics	Name, address and phone number. Any personal circumstance details you have chosen to share.	To allow us to send an engineer to visit your property to diagnose interference problems.
The Contact Company	Name, address, email address, phone number. Any personal circumstance details you have chosen to share.	Viewer telephone support for DMSL.
Freeview	Name, address, email address, phone number.	Viewer telephone support for general Freeview issues.
BBC's Radio & TV Investigation Service	Name, address, email address, phone number.	Viewer telephone support for general Freeview issues.

### Legal grounds for using your personal information

We only collect and use your personal information if we have a legal ground to do so. We rely on a number of different grounds for handling your personal information, which are as follows: Being necessary for our organisation's legitimate purposes In certain circumstances, it is necessary to collect and use your personal information for the purposes of our legitimate interests as an organisation, which are to:

- ensure that viewers who rely on free to view TV received through an aerial can continue to receive it, or are offered a suitable alternative, when mobile services below 900 MHz are upgraded in their area. We handle your personal information in the course of providing such support;
- provide our services to the highest standard;
- develop and improve our website to enhance the viewer experience;
- respond to any enquiries or complaints you have made, or deal with any disputes which may arise in the course of us providing our services to you; and

- ensure effective operational management and internal administration of our organisation, document retention, compliance with regulatory guidance and exercise or defence of legal claims.

Where we rely on this legal ground for handling your personal information, we are required to consider whether our interests as an organisation are overridden by your interests or your fundamental rights and freedoms. We have considered these matters and on balance, we consider that our interests described above are not outweighed by your fundamental rights and freedoms. You may request further information from us concerning the process we have followed here. You have the right to object to the decision we have arrived at – please see ‘Your Rights’ below. Where we think there is a risk that one of your interests or fundamental rights and freedoms may be affected, we will not use your personal information unless we have obtained your consent to use it in that way.

### Consent

We first obtain your consent before we use your personal information for the following activities:

- to conduct customer satisfaction surveys;
- to conduct quality assurance checks of the works our engineers perform; and
- to take into account any needs for additional assistance (for example, whether you are disabled) when we provide our services to you.

You may withdraw your consent at any time – please see ‘Your Rights’ below. Necessary for compliance with our legal obligations If asked, and if obligated and authorised to do so by law, we share your personal information with law enforcement agencies, regulators, courts or other public authorities.

### How long we keep your personal information

We retain your personal information for no longer than is necessary for the purposes for which it was provided. What this means in practice will vary between different types of information. Our policy on erasing data is as follows:

- Any personal information you have provided to us, including any sensitive information, will be removed from our systems and our third parties’ systems within four months of support being provided.

In certain limited circumstances we may be required to retain your personal information for longer. When determining whether this is necessary for the purpose(s) for which it was provided, we take into account factors including:

- whether you require any follow-up visits from our engineers;
- whether we have ongoing correspondence with you three months after the date our engineers last visited you;
- potential or actual disputes;
- legal obligation(s) under applicable law to retain data for a certain period of time; and
- guidelines issued by relevant data protection authorities.

### Your rights

You have the following rights regarding your personal information.

Rights	What does this mean?
1. Right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal information



	and your rights. This is why we are providing you with the details of what information we keep in this privacy policy.
2. Right of access	You have the right to obtain access to your personal information (if we are using it) and certain other information (similar to that provided in this privacy policy). This is so you are aware and can check that we are using your personal information in accordance with data protection law.
3. Right to rectification	You are entitled to have your personal information corrected if it is inaccurate or incomplete.
4. Right to erasure	This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your personal information where there is no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions (for example, we have the right to continue using your personal information if such usage is necessary for compliance with our legal obligations).
5. Right to restrict processing	You have the right to ‘block’ or suppress further use of your personal information in certain circumstances (for example, where you think the personal information we are using about you is inaccurate, whilst we verify its accuracy). When usage is restricted, we can still store your personal information, but may not use it further. We keep lists of people who have asked for further use of their personal information to be ‘blocked’ to make sure the restriction is respected in future.
6. Right to data portability	You have the right to obtain and reuse your personal information in a structured, commonly used and machine-readable format in certain circumstances when we use your personal information on certain legal grounds, such as consent. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party. The right to data portability does not apply to personal information which it is necessary for us to process for our organisation’s legitimate purposes. Please see the section legal grounds for using your personal information to read about the circumstances in which we use your personal information on the basis of consent or for our organisation’s legitimate purposes.
7. Right to object to processing on the grounds of legitimate interests	You have the right to object to us using your personal information for our organisation’s legitimate purposes. Please see the section legal grounds for using your personal information to read about the circumstances in which we use your personal information for our organisation’s legitimate purposes.
8. Right to withdraw consent to processing	If you have given your consent to us to use your personal information for a specific purpose, you have the right to withdraw your consent at any time (although if you do so, it does not mean that any use of your personal information up to that point is unlawful).
9. Right to make a complaint to the data protection authorities	You have the right to make a complaint to the Information Commissioner’s Office (ICO) if you are unhappy with how we have handled your personal information or believe our use of your personal information does not comply with data protection law.

For more information about your rights or if you would like to exercise any of your rights, you are welcome to contact us at the contact details set out below under *how you can contact us*.

### **How you can contact us or make a complaint**

If you would like to exercise your data protection rights or if you are unhappy with how we have handled your personal information, you may contact us by:

- emailing: [enquiries@dmsluk.com](mailto:enquiries@dmsluk.com);
- writing to: Digital Mobile Spectrum Limited, 24/25 The Shard, 32 London Bridge Street, London, SE1 9SG, UK.

If you would like to contact our data protection officer, you may do so by:

- emailing: [dpo@dmsluk.com](mailto:dpo@dmsluk.com);
- Data Protection Officer, Digital Mobile Spectrum Limited, 24/25 The Shard, 32 London Bridge Street, London, SE1 9SG, UK.

If you're not satisfied with our response to any enquiry or complaint or believe our use of your personal information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) by:

- writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF;
- calling: 0303 123 1113; or
- submitting a message through the ICO's website at: [ico.org.uk](https://ico.org.uk).

### **Use of social media to contact us**

If you provide information to us via a social media platform (e.g. [Twitter](#) or [Facebook](#)), this privacy policy applies to our use of that information. This privacy policy does not apply to any other use of your personal information by those platforms. We encourage you to read the privacy statements on the social media platforms you use, as they will govern any other use of your personal information by those platforms.

### **Our Information Commissioner registration**

We are registered as a data controller with the Office of the Information Commissioner. Our registration details can be found [here](#).

### **Changes to this privacy policy**

From time to time we may update this privacy policy, and when we do we will publish the changes on our website.

14 June 2021



