
Summary

We, us, our, or just 'Freethought' refers to Freethought Internet Limited, a private limited company registered in England and Wales with registration number 5862996. Our registered office is Unit 5, Oak House, Witham Park, Waterside South, Lincoln, LN5 7FB.

Freethought is registered with Information Commissioner in the UK as a data controller with reference number ZA376297.

Freethought collects, stores, and processes a large amount of personal information either as part of providing our services to customers, or incidentally because customers store and process personal information using the services we provide them. We take our responsibility to keep this information safe and secure extremely seriously.

This document will outline our commitments to you relating to your personal information, and the personal information of your customers, and will clarify precisely what information we collect, why, and how long we keep it for.

This document will refer to "personal information" in the legally defined sense of the word, as well as other less protected "information" and will refer to both as "personal information" and "information" interchangeably. We view all the information we hold about you in the same regard whether the law requires us to protect it specifically or not.

Information we collect about you, our customer

We collect the following information about you for the purposes of providing the service to you as part of our contract to each other.

- First name
- Last name
- Company name
- Email addresses (current and historical)
- Security questions and answers
- Address
- Address history
- Telephone numbers
- VAT numbers
- Payment information such as credit card information, PayPal email addresses, bank details.
- IP addresses that you login to the customer portal from.
- IP address that you connect to our services from such as when sending, receiving emails, browsing our customer portal, website, or your own website, or the websites of other customers that we happen to host.

We collect this information about the primary contact on an account with us, and some or all of the same information about any other contacts that you add to your account in the Freethought customer portal.

The information you provide us will be stored in our customer portal and help desk software on servers within the UK. The information you provide us will also be duplicated and stored within our accounting software, see "Information we share with others for third party processing" for more information about this.

Retention: We store your information for as long as you are a customer, once you cease to be a customer your information will be retained for 7 years due to our legal obligation to maintain accounting records, after 7 years your information will be erased.

IP address information retention: IP address information relating to access to the customer portal will be held inline with the same terms as other personal information, i.e. for as long as you are an active customer, plus 7 years before being erased. This is for the purposes of fraud prevention and detection. Other IP address information such as connections to web and email servers will be held for 1 month for the purposes of providing technical support, detecting and preventing crime, and to defend our network against threats. After 1 month the information will be erased. IP addresses that have been detected as attacking our network will be held indefinitely for the purposes of defending the network from further attack.

Marketing communications

We send marketing communications to our customers, potential customers who have contacted us, and past customers. We will only send marketing communications via email, SMS, and post where we have explicit consent to do so.

You can opt-in or opt-out of marketing communications at any time from the customer portal, or using the unsubscribe link in any email communication, or by contacting us.

Information we collect about people who contact us

When people contact us by phone, email, live chat, text message, or social media, even those who are not customers, we collect some personal information for legitimate interest purposes. The information we collect will be solely used to provide pre-sales or other such information relevant to the sales process.

We collect some or all of the following information in pre-sales and other non-customer contact:

- Full name
- Email address
- Telephone number(s)
- Address(es)
- Supply address(es) (if different)
- IP addresses (from email, live chat, website access etc)

Retention: This information will be erased after 6 months unless that person becomes a customer in which case it will be retained for as long as that person remains a customer plus 7 years.

Information we transfer to other for third party processing

We will never sell or share your information to others for the purposes of marketing or other such activities. However we will transfer this data to companies that provide services to us in order that we can deliver our service to you, we consider this a legitimate interest. We refer to these companies as third party processors.

- We share your email address, name, and either a ticket or order references number with our Reviews provider (reviews.co.uk) for the purposes of collection impartial reviews of our company and products for publishing online. You can opt to have your name be anonymised in the published review, although it will be stored in the records associated with the review along with the IP address you were using when you left the review.
- We will share the full name, address, postal code, and payment information with our card processor, Stripe, for the purposes of processing debit/credit card payments if you select that payment method. We will send the postal code we have for you to your bank along with other payment information to verify your account and prevent fraud.
- We share the full name, address, postal code, payment history, and IP addresses with fraud detection and referencing agencies for the purposes of fraud prevention. In particular we share data with CreditSafe, FraudRecord, and MaxMind.
- Information relating to support tickets and emails sent to Freethought will be shared with Slack, a messaging service that we use to facilitate internal communications. This information will be kept private, encrypted, and only accessibly to authenticated users of our Slack environment.
- We will share the full name, company name, address, postal code, and company legal information with the domain registry responsible for any domain you register for the purposes of providing that domain registration service to you.
- Solicitors, accountants, and other such professionals will have access to the personal information of our customers on occasion. We will not share your data with these organisations, but they will be able to access via our systems.

Retention: These companies will retain your your information as per their own privacy policies. You can request erasure by contacting them directly or by contacting us. When data is erased from our systems it will subsequently be erased from third party systems in a reasonable timeframe.

Domains and WHOIS

When you register a domain your personal information is transferred to a third party domain registrar and/or registry in order that your domain may be registered. This data is provided to them for the purposes of fulfilling a three way contract between you, us, and the registry who administers the domain you wish to purchase.

All domains are in a WHOIS database which is a public database of domain owners that anyone can search and see the name, company, address, and in some cases phone number of domain registrants.

For non-UK domains where the registrant, technical, billing, or administrative contact has an address within the EU then the WHOIS data in the public WHOIS record will be masked or not available and not publicly accessible. However this information may well be made available to law enforcement anywhere in the world, and to intellectual property firms who may have paid for access to your data.

For UK domains the registrant's personal information will not be publicly accessible by default unless the domain registrant opts-in to having that personal information publicly accessible.

Because providing your information is necessary to register a domain if you refuse to provide your information to us for the uses described in this section then you will not be able to register the domain name.

Information we collect about your customers

During the course of providing service to you we will naturally collect information about your customers, in this scenario we consider ourselves both a data controller and a data processor. You should ensure that you inform your customers.

We collect the following information about your customers,

- IP addresses

We collect and log the IP address of every device to connect to our services via a variety of protocols including but not limited to HTTP, IMAP, POP3, SMTP, and FTP. This information is collected for the purposes of providing technical support, and to detect and prevent fraud or attacks against our network. In the case of HTTP/HTTPS this data is collected to provide the site operator with information about traffic patterns to their website.

For protocols except HTTP/HTTPS this information will be retained for no longer than 1 month at which time it will be erased. For HTTP/HTTPS this data will be retained for no longer than 24 months but may be kept for less time if the site operator opts to store it for less.

- Other non-personal information

We also collect data not considered personal information such as computer name when connecting via SMTP as well as MAC address in some cases. We will also log the length of time connected, number of connections and other information as part of routine log taking. This data will be retained in the same time frame as IP address information detailed above.

The information described in this section will also be made available to our customer, and in turn to the site operator which may or may not be a direct customer of Freethought.

Personal information that we process for you

As a hosting provider we provide services that allow you, our customer, to upload and store personal information that falls within the remit of data protection legislation. We don't control the nature and reason for collecting the information, but we do consider ourselves the data processor for this information as we have a shared responsibility over the security, storage, and erasure of that data. We consider you the data controller for the personal information.

As your hosting provider we will endeavour to protect the data we store for you in a variety of different ways such as strict firewall rules, anti-virus, and other technological threat mitigations. We are however largely dependent on the strength of passwords that you our customer opt to

use, we encourage our customers to use strong passwords, enable two factor authentication, and update software regularly as this offers the best possible protection.

As a data processor for personal information for which you are the data controller we will exercise all the same controls and measures to protect and handle that personal information as we would for data for which we are the data controller.

Sections of this privacy policy relating to third party processors, IP address logging, international transfers, law enforcement, and other policies about what we may do with personal information will apply to personal information that we process for you.

As the data processor for your customers information we do have a legal obligation relating to erasure requests and other such statutory rights, your customers (or customers of customers) could approach Freethought with an erasure or similar request which we are obligated to respond to, we would however within reasonable timeframes defer to our customer to handle these requests within the timeframes defined by legislation.

Law enforcement and legal professionals

When required to do so we will share any or all of your personal information and other information we store about you, as well as any data stored on our servers which may include personal information for which you are the data controller with law enforcement agencies. If we feel a crime has or may have been committed we will voluntarily share this information with relevant law enforcement or fraud agencies.

In addition your personal information may be made available by third party processors such as domain registries to law enforcement or intellectual property firms in the event that a lawful request is received for that data by those third parties.

Transferring data internationally

Like many organisations we use third parties around the world in the course of running our business, these third parties may or may not be within the European Economic Area. We will do everything we can to ensure that any personal information we transmit internationally is adequately protected and done lawfully. If we do have to transfer personal information to a country that the European Commission deems does not provide adequate legal protection for personal information then that transfer will utilise mechanisms such as approved contractual clauses to ensure the information is protect adequately in line with our legal obligations.

Job applications

If you apply for a job with us, or send us your resumé speculatively we will store your personal information for the purposes of considering your application, this is necessary so we have all the information to make a decision about you potential employment.

Retention: We will retain your information until the position has been filled, if a resumé has been sent speculatively then it will be retained for no longer than 1 year from the date we receive it at which point it will be erased.

Website and social analytics

We utilise analytical software to monitor and analyse visitors behaviour on our website including the time they spend on the site, which pages they visit, the links they click, where they scroll on the website, and the cursor position on the page.

The data we collect is not personally identifiable in anyway whatsoever and is collected purely for the purposes of optimising our website, social media and marketing strategies, and website design and order flow.

Retention: We retain this data indefinitely due to the fact that it is not personally identifiable and by doing so allows us to monitor trends over extended periods of time.

Cookies

Cookies are small files that are created by websites and stored within your browser. Our website creates a number of cookies within your website for the purposes of allowing you to remain logged into the customer portal, detecting and preventing fraud, and to provide anonymous analytical behavioural tracking within our website for the purposes described under the "Website and social analytics" section of this policy.

Retention: You can control the creation and retention of cookies in your browser settings.

Correcting your personal information

You have the right to correct the personal information we store about you, a customer can correct the information we store using the customer portal or by contacting us directly by phone or email.

Erasing your personal information

In some cases you have the right to request that we erase all personal information we hold about you, you can request this by emailing us.

In order to handle your request to have your information erased we may need to collect additional personal information to enable us to match you to the information we hold about you, this will only be used for the purposes of processing your erasure request and will be erased along with the rest of your data once your request is complete.

When you request your information be erased we will erase it for you right away, however due to the nature of our off-site backups your data will not be completely erased for up-to 60 days after your request whilst our backups expire.

If you are requesting that we erase information that we are the processor for because we host or provide services to a website that is the controller for your information, we will contact our customer first before taking steps to erase your information ourselves. We take our legal responsibility seriously, but we have an obligation to work with our customers to satisfy your request. We will keep you updated through the process and will work to ensure your information is erased as per your rights in a timely manner.

Data breach

In the extremely unlikely event that we experience a data breach on any of our systems that may have exposed your personal information we will notify you as soon as practically possibly by email using the primary email we store for you. We will if necessary also notify law enforcement and the Information Commissioner.

Lawful basis for processing

Under the General Data Protection Regulations, unless otherwise indicated in the relevant section above, we are processing your personal information in order that we may provide a service to you as part of a contract. If you refuse to provide the information necessary to enter a contract, then we will not be able to deliver services to you.

Where we are processing your personal information for marketing purposes based on consent, you can withdraw your consent at any time using our website or by contacting us.

Where we are processing data on behalf of our customers as part of providing a service to them, we are processing under the lawful basis of legitimate interest in order that we can actually provide the service to our customer that they have contracted to us which involves processing data on their behalf that you consented to provide to our customer as part of their own privacy policy.

Questions

Privacy policies can be complicated, we want you to really understand what your data is being used for and trust us with it. If you aren't sure or want to chat it over then give us a call on 03300 882130