



# FourNet<sup>®</sup>

## Website Privacy Policy

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## Document Control

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## Document Information

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The controlled copy of this document is the signed PDF document on the FourNet SharePoint and is available to all authorised users. All printed and electronic copies of previous versions are considered uncontrolled copies used for reference only.

## Authorisation

Document prepared by: Sarah-Jane Heber-Hall  
Head of Compliance

Verified and authorised by:   
Richard Pennington  
Chief Executive Officer (CEO)

## 1. Policy Statement

4net Technologies Ltd ("FourNet") understands that your privacy is important and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits our website [www.fournet.co.uk](http://www.fournet.co.uk), ("our website" or "our site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

At FourNet we are committed to safeguarding and preserving the privacy of our website visitors. This policy explains what happens to any personal data that you provide to us, or that we collect from you whilst you are visiting our website.

## 2. Information We Collect

In running and maintaining our website we may collect and process the following data about you:

- Information about your use of our site including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data.
- Information provided voluntarily by you, e.g., when you register your details to request information.
- Information that you provide when you communicate with us by any means.

## 3. Use of Cookies

Cookies provide information regarding the computer/device used by a visitor. We may use cookies where appropriate to gather information about your computer/device in order to assist us to improve our website.

We may gather information about your general internet use by using cookies. Where used, these cookies are downloaded to your computer/device and stored on the computer's/device's hard drive. Such information will not identify you personally; it is statistical data which does not identify any personal details whatsoever.

You can adjust the settings on your computer/device to decline any cookies if you prefer. This can easily be done by activating the reject cookies setting on your computer/device.

## 4. Use of Your Information

We use the information that we collect from you to provide our services to you. In addition to this, we may use the information for one or more of the following purposes:

- To provide information to you that you request from us relating to our products or services
- To provide information to you relating to other products that may be of interest to you. Such additional information will only be provided where you have consented to receive such information.
- To inform you of any changes to our website, services or goods and products.
- If you have previously purchased goods/services from us we may provide you with details of similar or other goods/services that we feel may be of interest.

## 5. Disclosing Your Information

We will not disclose your personal information to any other party, other than in accordance with this policy and in the circumstances detailed below:

- In the event that we sell any or all of our business to the buyer.
- Where we are legally required by law to disclose your personal information.
- To further fraud protection and reduce the risk of fraud.

## 6. Third-Party Links

On occasion we include links to third-party websites on our site. Where we provide a link, it does not mean that we endorse or approve that site's policy towards visitor privacy. You should review the respective third party's privacy policy before sending any personal data.

## 7. Access to Information

The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

In accordance with the General Data Protection Regulations (GDPR), you have the right to access any information that we hold relating to you. Additionally, you have the right to object to the processing of your personal data relating to Direct Marketing.

Should you wish to make any GDPR related request to FourNet, please make the request via our dedicated email: [dpo@fournet.co.uk](mailto:dpo@fournet.co.uk). Upon receipt of the request, our team will start the review process, which will be conducted free of charge.

## 8. Information Security Incident Management

FourNet employees must acquaint themselves with the Company's Information Security Incident Management Policy (**document reference 002 39**). Any information security risk, weakness or event that may compromise this Website Privacy Policy will be dealt with in accordance with policy 002 39.

## 9. Policy Enforcement

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment or contract. In certain circumstances, an investigation by the relevant regulatory body and/or the police may apply.

## 10. Communicating FourNet's Policies

Relevant training, bulletins, education materials, policies, procedures, and processes are provided on an ongoing basis to all employees to ensure they are fully aware of their responsibilities and are kept up-to-date of any new requirements. These are communicated in a number of ways, including, but not limited to:

- Induction sessions
- PDR meetings
- Company meetings
- Atlas/Citation portal
- Regular company bulletins via Microsoft Teams

## 11. Review and Ownership of This Policy

This policy will be reviewed and amended as required, and at least annually by the appropriate SLT representative, the Head of Compliance, or a member of the Compliance team in collaboration with the Head of Compliance.

## Change History

Date	Version	Brief Description	Author
08.06.19	0.1	Initial Draft	Toni Hazlewood
10.06.19	0.2	Amendments	Julie White
15.06.19	0.3	For Board Review	David O'Brien
01.07.19	1.0	Issue One	David O'Brien
27.10.20	1.1	Company Rebranding and Formatting	Toni Hazlewood
28.10.20	1.2	For Board Review	David O'Brien
06.11.20	2.0	Issue Two	David O'Brien
04.12.20	2.1	Information Security incident Management	David O'Brien
17.11.21	2.2	Annual Review	David O'Brien
24.10.22	2.3	Annual Review	Sarah-Jane Heber-Hall
05.09.23	2.4	Annual Review	Sarah-Jane Heber-Hall
05.09.24	2.5	Annual Review and amendment to the GDPR contact details under section 7.	Sarah-Jane Heber-Hall
05.09.25	2.6	Annual Review: <ul style="list-style-type: none"> <li>• Moved Change History section to the end of the policy to streamline the document as the policy matures.</li> <li>• Minor formatting and grammatical amendments throughout.</li> <li>• Addition of the term "computer/device" in Section 3 (Use of Cookies), to take into consideration users accessing our website on mobile phones, tablets, etc.</li> </ul>	Aimee Whitfield