

## Introduction

Welcome to Connexus Networks Limited's privacy notice.

Connexus Networks Limited 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, which we collect from you when you visit our website (regardless of where you visit it from) and when we supply services or products. It will also tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. **[IMPORTANT INFORMATION AND WHO WE ARE]**
2. **[THE DATA WE COLLECT ABOUT YOU]**
3. **[HOW IS YOUR PERSONAL DATA COLLECTED]**
4. **[HOW WE USE YOUR PERSONAL DATA]**
5. **[DISCLOSURES OF YOUR PERSONAL DATA]**
6. **[INTERNATIONAL TRANSFERS]**
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### 1. Important information and who we are

#### Purpose of this privacy notice

This privacy notice aims to give you information on how Connexus Networks Limited collects and processes your personal data through your use of this website, <http://www.connexusuk.com/>, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service or take part in a competition. It also aims to give you information about how Connexus Networks Limited collects and processes your personal data when we supply services and products to you.

This website is not intended for children and we do not knowingly collect data relating to children.

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

Connexus Networks Limited is the controller and responsible for your personal data (referred to as "Connexus Networks", "we", "us" or "our" in this privacy notice).

We have appointed a data protection officer (DPO) who is 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*, please contact the DPO using the details set out below.

## Contact details

Our full details are:

Full name of legal entity: Connexus Networks Limited

Data protection officer (DPO): Jeff Elliott

Email address: jelliott@connexusuk.com

Postal address: Unit 202, Stonehouse Business Park, Sperry Way, Stonehouse, Gloucestershire GL10 3UT

Telephone number: 01453 827700.

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

This version was last updated on 5<sup>th</sup> April 2022.

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

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.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, and date of birth.
- **Contact Data** includes billing address, delivery address, company name, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details, your credit rating information (which we acquire from credit reference agencies) and other banking information.
- **Transaction Data** includes your billing history, details about payments to and from you, other details of our products and services that you use, and anything else relating to your account with us.
- **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, and also includes information on how you use our products and services, such as (but not limited to):

- The date, time, duration and cost of your communications including your phone location at the time these communications are made.
  - The phone numbers that you call and send messages to (and the phone numbers that you receive calls and messages from).
  - Your phone or device usage.
  - Your data usage.
  - Where we provide you with support services, additional data relating to your systems and products that we are supporting you with (what this is will vary from case to case, depending on the nature of the issue that we are supporting you with and the type of support that we are providing).
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
  - **Usage Data** includes information about how you use our website, products and services.
  - **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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 is not considered personal data in law as this data 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 used in accordance with this privacy notice.

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**

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.

## **3. How is your personal data collected?**

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

- **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:
  - search for a product or service through our website, when you order a product or service from us, or during the sales process;
  - subscribe to our services or publications;
  - create an account on our website or log in to your account where you already have one;
  - request marketing to be sent to you;

- enter a competition, promotion or survey; or
- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will 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 our cookie policy at <https://www.connexusuk.com/cookie-policy/> for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
  - Technical Data from the following parties:
    - (a) analytics providers such as Google based outside the EEA;
    - (b) social media platforms such as LinkedIn and Twitter, both of which are based outside the EEA;
    - (c) advertising networks such as Google AdWords based outside the EEA; and
    - (d) search information providers such as Google based outside the EEA.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services, such as Eazipay Limited and Union Street Technologies Limited, both of which are based inside the EEA.
  - Identity, Contact, Financial and Transaction Data from credit reference agencies, such as Experian Limited based inside the EEA.
  - Identity and Contact Data from publicly available sources such as Companies House and based inside the EEA.

#### 4. How we use your personal data

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:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click here to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
<p>To process and deliver your order including:</p> <p>(a) Carrying out our obligations arising from any contracts entered into between you and us</p> <p>(b) To confirm that your orders have been received and to process them</p> <p>(c) To provide our products and services</p> <p>(d) To provide you with the information and services that you request from us</p> <p>(e) For billing purposes, to manage payments, fees and charges</p> <p>(f) To collect and recover money owed to us</p>	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical (f) Profile (g) Usage (h) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To validate you as a registered customer when using our services and calling our customer services	(a) Identity (b) Contact	(a) Performance of a contract with you
To notify you about changes to our services and to make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Profile	(a) Necessary for our legitimate interests (to develop our products/services and grow our business)
For the administration of files and records; business management and planning, including accounting and auditing	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services) (b) Necessary to comply with a legal obligation
To prevent fraud	(a) Identity	(a) Necessary for our legitimate interests (to prevent fraud).
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or</p>	(a) Identity (b) Contact (c) Profile (d) Marketing and	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study

privacy policy (b) Asking you to leave a review or take a survey	Communications	how customers use our products/services)
To send certain communications (including by email and SMS) to you including service announcements and administrative messages and other communications relating to our services	(a) Identity (b) Contact (c) Technical	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (for running our business, provision of administration services, network security and in the context of a business reorganisation or group restructuring exercise)
To ensure security for you and our staff, and help maintain service quality (calls to our customer services may be monitored and/or recorded for authentication, security, quality and training purposes)	(a) Identity (b) Contact	(a) Performance of a contract with you
To help the emergency services	(a) Identity (b) Contact	(a) Where we need to comply with a legal obligation
To enable you to partake in a competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

experiences		
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To comply with applicable laws, regulations, court orders, government and law enforcement agencies' requests, to operate our systems properly and to protect ourselves, our users and customers and to solve any customer disputes	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Where we need to comply with a legal obligation

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

### Promotional offers from us

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 (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

### Third party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## Cookies

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. For more information about the cookies we use, please see <https://www.connexusuk.com/cookie-policy/>

## Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to

make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration.
- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

### **Change of purpose**

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.

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.

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.

## **5. Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Third Parties as set out in the *Glossary*.
- 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.

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 only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

Many of our external third parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- 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: Model contracts for the transfer of personal data to third countries.

Please contact us if you want further information on the specific mechanism used by us when



transferring your personal data out of the EEA.

## 7. Data security

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 on our instructions and they are subject to a duty of confidentiality.

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.

## 8. Data retention

### How long will you use my personal data for?

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.

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for tax and accounting purposes, and to defend any legal claims should we need to. After this period, we no longer retain it.

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.* [Request Access](#)
- *Request correction of your personal data.* [Request Correction](#)
- *Request erasure of your personal data.* [Request Erasure](#)
- *Object to processing of your personal data.* [Object to Processing](#)
- *Request restriction of processing your personal data.* [Request Processing Restriction](#)
- *Request transfer of your personal data.* [Request Transfer](#)
- *Right to withdraw consent.* [Request Withdraw Consent](#)

If you wish to exercise any of the rights set out above, please contact us.

### No fee usually required

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

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 for further information in relation to your request to speed up our response.

## Time limit to respond

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 you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Performance of Contract** means 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.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### THIRD PARTIES

- Our suppliers and other providers that we work with, based in various countries within and outside the EEA, who help us to provide our services to you or who carry out services on our behalf. We also use them to:
  - provide customer-service, marketing, infrastructure and information technology services;
  - personalise our service and make it work better;
  - process payment transactions;
  - carry our fraud and credit checks, and collect debts;
  - analyse and improve the information we hold; and
  - conduct surveys.
- Other companies we work with, including Connexus Technology Limited (based in the UK) and their respective partners, agents and sub-contractors, in relation to second-line support services.
- Other communications companies.
- Insurance providers when you take out a policy through us.
- Third parties whose products and services we market to you (where you have given permission to receive such messages).
- Credit reference and fraud prevention agencies. When we check your credit score with a credit reference agency, the fact that we have requested that search will also be recorded by the credit reference agency. We share information with credit reference agencies on payment performance on an ongoing basis and this information could be used by us and third parties to make future

credit assessment decisions.

- Service providers acting as processors, based in various countries within and outside the EEA, who provide various services to us.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, the Information Commissioner's Office, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

## YOUR LEGAL RIGHTS

You have the right to:

**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.

**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.

**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.

**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 on 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.

**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 legal claims; 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.

**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.

**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.