

Privacy Notice:

Connects2 is committed to protecting your privacy and complies with the principles of the relevant data protection regulations.

This Privacy Policy explains how and why we collect your personal data and how it is used.

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1 Who we are:

- 1.1 This privacy notice (the "Privacy Notice") applies to all personal information processing activities carried out by Connects2 Ltd
- 1.2 Connects2 Ltd is a data controller in respect of personal information that is process in connection with Connects2. In this notice, references to "we", "us" or "our" are references to Connects2 Ltd
- 1.3 The principal address of Connects 2 Ltd is Qualtronic Business Park, High Street, Princes End, Tipton, DY4 9HG.
- 1.4 We respect individual's rights to privacy and to the protection of personal information. The purpose of this privacy notice is to explain how we collect and use personal information in connection with our business. "Personal information" means information about an individual who can be identified by that information (either by itself or when it is combined with other information). We may update our Privacy Notice from time to time by communicating changes to you and by publishing the updated Privacy Notice on our website at <http://www.connects2downloads.co.uk/c2/file/privacynotice.pdf> We would encourage you to visit our website regularly to stay informed of the purpose for which we process your information and your rights to control how we process it.

2 The information we process:

- 2.1 We collect and process personal information throughout the course of your relationship with us. We will limit the collection and processing of information to information necessary to achieve on or more legitimate purposes as identified in this notice. Personal information may include;
 - a) Basic personal information including name and address
 - b) Financial information including payment information relating to your account
 - c) Goods and services provided
 - d) Online profile and social media information based on your interaction with us and our websites and applications including searches and website visits.
- 2.2 Data users must comply with the data protection principles of good practice which underpin the GDPR legislation. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to another person unlawfully. To do this Connects2 Ltd follows the data protection principles outlined in the GDPR legislation which are summarised as below:
 - a) Personal data will be processed fairly and lawfully
 - b) Data will only be collected and used for specific purposes
 - c) Data will be adequate, relevant and not excessive
 - d) Data will be accurate and up to date
 - e) Data will not be held longer than necessary
 - f) Data subject's rights will be respected
 - g) Data will be kept safe from unauthorised access, accidental loss or damage

- h) Data will not be transferred out of the European Economic area unless that country has equivalent levels of protections for personal data.

3 How we obtain information

3.1 Your information is made up of all of the information we collect and hold about you and your business and the proprietors, officers, agents, employees and beneficial owners of your business and your transactions with Connects2 Ltd. It includes:

- a) Information you give to us, including for example, information provided by filling in forms or communicating with us – whether face to face, by phone, letter, email or other forms of electronic communication
- b) Information we receive from third parties including, for example, Affiliates, the organisation you work for, any organisation where you are the beneficial owner, third parties claiming to be acting with your authority (your agents), third parties who provide services to you or us, and credit reference agencies.
- c) Information we learn about you through our relationship with you.
- d) Information we gather from the technology which you use to access our services for example location data, IP address and telephone number)

4 Why we need your information and what we do with it.

4.1 Connects2 Ltd obtains personal data (such as names, addresses, phone numbers, email addresses) for a number of reasons. We need the information primarily to allow us to perform our contract with you (*) or to enable us to comply with legal obligations (**) or to pursue legitimate interests of our own or those of third parties provided your interests and fundamental rights do not override those interests (***) ;

- a) To assist staff in the efficient management of your account with us (*) .
- b) To process payments and collect arrears; we will use your information to process the payments for orders made for our products (*) .
- c) We will use your information for marketing purposes such as if we think one of our products may interest you (***)
- d) To Investigate and resolve complaints you may have (*).
- e) Perform assessments and analyse customer data for the purposes of managing, improving and fixing data quality (***).
- f) For internal training purposes, we will use your information to ensure that our team has the knowledge and expertise they need to ensure we provide the best possible experience to our customers when interacting with us (***).
- g) To let you know about significant changes to our products, terms or privacy policy, we will let you know by email, website or WhatsApp if there are significant changes to our products, their features, our terms or our privacy policy (**).

5 Your Rights

5.1 We want to make sure you are aware of your rights in relation to the personal information we process about you. We have described these rights and the circumstances in which they apply in the below.

- 5.2 If you wish to exercise any of these rights or if you have any queries about how we use your personal information which are not answered here, please contact us at sars@connects2.com or by post at Connects2 Ltd SARS, Qualtronic Business Park, High Street, Princes End, Tipton, DY4 9HG
- 5.3 Right of Access; you have a right to access the personal information we hold about you.
- 5.4 Right of Rectification; you have a right to request that inaccurate personal information be rectified and incomplete personal information updated, if you believe that any of the information we hold about you is inaccurate, you have a right to request that we restrict the processing of that information and to rectify the inaccurate personal information.
- 5.5 Right of Erasure; you have the right to request that we delete your personal information. You may request that we delete your personal information if; you believe that we no longer need to process your information for the purposes it was provided for; we have requested your permission to process your personal information and you wish to withdraw your consent; or you believe we are not using your information in a lawful manner.
- 5.6 Right of Restriction; You have a right to ask us to restrict the processing of your personal information, you may ask us to restrict the processing of your personal information if you believe that:
- a) Any of the information we hold about you is inaccurate
 - b) We no longer need to process your information for the purposes it was provided for, but you require the information to establish, exercise or defence legal claims; or
 - c) We are not using your information in a lawful manner
- 5.7 Right of Portability; You have the right to data portability, where you have provided us with information for the purposes of entering into a contract with us, you have a right to received, in a portable format, the personal information you provided to us. You may also ask us to provide it directly to a third party if technically feasible. We are not responsible for such third parties use of your information which will be governed by such third party's agreement with you and any privacy statement it provides to you.
- 5.8 Right of Objection; you have the right to object to direct marketing, you have the right to object, at any time, to the processing of your personal information for direct marketing purposes, including profiling you for the purposes of direct marketing.
- 5.9 Right to Withdraw consent; Where we rely on your permission to process your personal information you have the right to withdraw your consent at any time, we will always make it clear where we need our permission to undertake specific processing activities.

6 Changes to the way we use your information

Connects2 Ltd may, from time to time, change the way we use your information. Where we believe you may not reasonable expect such a change we will notify you and allow a period of not less than 30 days for you to raise any objections before any changes are made to the way your information is used.

7 Sharing with Third Parties

7.1 We will not share your information with anyone outside of Connects2 Ltd except:

- a) Where we have your (or your agents) express or implied permission
- b) Where required for your product or service

- c) Where we are required to by law or law enforcement agencies.
- d) With third parties providing services to us such as market analysis
- e) Where required for a proposed sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business.

8 Marketing Information

8.1 7.1 Unless you have told us you do not want to hear from us, we may send you relevant marketing information, including details of products provided by us. If you no longer wish to receive this information you can tell us at anytime by contacting us at sars@connects2.com or by post at Connects2 Ltd SARS, Qualtronic Business Park, High Street, Princes End, Tipton, DY4 9HG

9 Communication about your Account

- 9.1 If you are a customer of ours or act on behalf of a customer of ours we will contact you with information relevant to the operation and maintenance of your account (including updated information about how we process your personal information). If you wish to change your details at any point in the future, you should tell us promptly about those changes.
- 9.2 Electronic communications and conversations between us and you may be monitored and/or recorded for training purposes, internal investigations, to check instructions or for legal reasons. Those recordings may be used by us in evidence in the event of a dispute with you. A copy of any such recordings of conversations and communications between us and you will be available upon request for a period of 5 years.

10 How long we keep your information

- 10.1 By providing you with products, we create records that contain your information, such as customer account records and activity records. Records can be held on a variety of media (physical or electronic) and in different formats.
- 10.2 We manage our records to help us serve our customers well (for example operational reasons, such as dealing with any queries relating to your account) and to comply with legal requirements. Records help us demonstrate that we are meeting our responsibilities and serve as evidence of our business activities.
- 10.3 Retention periods for records are determined based on the type of record, nature of activity and the relevant product or service. Retention periods may change from time to time based on business or legal requirements.
- 10.4 If you would like more information about how long we keep your information please contact us at sars@connects2.com or by post at Connects2 Ltd SARS, Qualtronic Business Park, High Street, Princes End, Tipton, DY4 9HG

11 Security

- 11.1 Only the staff of Connects2 Ltd will normally have access to personal data, All Staff are made aware of the data protection policy and their obligation not to disclose personal data to anyone who is not supposed to have access to it.
- 11.2 Any information is kept in a secure filing, paper and electronic system with controlled access during the day to day running of Connects2 Ltd.

