



Connexin Customer Privacy Policy

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1 INTRODUCTION

Your privacy is important to us. Customer privacy means ensuring that any personal information you provide to us is handled responsibly, kept secure, and only used for clear and legitimate purposes.

We take your privacy seriously and are committed to protecting your personal data. Collecting and holding personal data is a responsibility we carry out in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy explains:

- when and why companies in our group collect personal data,
- how this data is used,
- the conditions under which it may be disclosed to others, and
- how it is kept secure.

For the purposes of this policy, our “group” means our subsidiaries, our ultimate holding company and its subsidiaries (as defined in section 1159 of the UK Companies Act 2006).

This policy may change from time to time. We recommend checking this page periodically to ensure you are happy with any changes.

2 WHO WE ARE

Our group consists of a number of individual companies operating under common ownership.

When you interact with one of our companies (for example, by using our services, registering an account or contacting us), that specific company will act as the **“data controller”** of your personal data. A data controller is the organisation responsible for deciding how and why your personal data is processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Where this policy refers to “we”, “our” or “us”, it means the relevant company within our group that is acting as the controller of your personal data in relation to the processing described in this policy, unless otherwise stated.

We may share your personal data with other companies within our group where necessary for internal administrative purposes, to support the delivery of our



services, and to ensure a consistent and efficient customer experience. Any such sharing will be carried out in accordance with applicable data protection laws and this privacy policy.

For further information about the identity of the data controller or details of our group companies, you can contact us using the details provided at the end of this policy.

3 APPLICABLE LEGISLATION

We process your personal data in accordance with applicable data protection laws in the United Kingdom. These include:

- **UK General Data Protection Regulation (UK GDPR)**
This sets out the core principles, rights, and obligations relating to the processing of personal data.
- **Data Protection Act 2018**
This supplements the UK GDPR and provides additional provisions for how personal data is handled in the UK.
- **Privacy and Electronic Communications Regulations 2003 (PECR)**
These regulations apply to electronic marketing (such as email, SMS, and cookies) and set rules on how we communicate with you and obtain consent where required.
- **Other applicable laws and regulatory requirements**
Depending on the services we provide, we may also be required to process personal data in accordance with other UK laws, including those relating to consumer protection, fraud prevention, and regulatory compliance.

We are committed to ensuring that all personal data is:

- processed lawfully, fairly, and transparently
- collected for specified, explicit, and legitimate purposes
- limited to what is necessary
- accurate and kept up to date
- retained only for as long as necessary
- kept secure through appropriate technical and organisational measures

We also ensure that individuals can exercise their rights under data protection law, as set out in this policy.



4 HOW WE COLLECT YOUR PERSONAL DATA

We collect personal data about you in a variety of ways, depending on how you interact with us.

Personal data you give to us

This is information you provide to us directly, including when you:

- use our website or mobile applications.
- create or manage an online account.
- connect to our Wi-Fi services.
- interact with us via social media platforms (such as Facebook or X); or
- contact us by phone, email, post, SMS, live chat, or otherwise.

This includes information provided when you:

- register to use our services.
- make an enquiry or request information.
- purchase or use our services.
- manage your account (including accessing documentation);
- submit forms or upload information.
- report a problem; or
- respond to surveys or provide feedback.

The personal data you provide may include your name, address, email address, telephone number, date of birth, job title, business details, payment and billing information, account information, marketing preferences, and details of your communications with us.

Where necessary and proportionate, we may also collect **special category data** (such as information relating to your health, disabilities or vulnerability) where this is required to provide appropriate support or meet our legal obligations.

Personal data we collect about you

When you use our website or services, we may automatically collect certain information, including:

- details of your visits, such as pages viewed and how you navigate the site.
- usage data, including frequency and duration of visits.
- technical data such as your IP address, browser type and version, time zone setting, operating system and platform; and
- information about how you interact with our communications.



This information helps us understand how our services are used and improve the user experience.

Personal data we may receive from other sources

We may receive personal data about you from third parties, including:

- other companies within our group.
- business partners, resellers or subcontractors.
- local authorities or public bodies.
- marketing agencies or data providers.
- third-party platforms where our services are offered; or
- as part of a business acquisition or transfer.

Where we receive personal data from third parties, we ensure that it is handled in accordance with applicable data protection laws and this policy.

5 HOW WE USE YOUR PERSONAL DATA

We will only use your personal data where we have a lawful basis to do so under UK data protection law. The main purposes for which we use your data are set out below.

Performance of a contract with you

We use your personal data to provide and manage the services you have requested from us. This includes:

- setting up and managing your account.
- delivering services and support.
- processing payments.
- communicating with you about your services; and
- taking steps at your request prior to entering into a contract.

Legitimate interests

We may process your personal data where it is necessary for our legitimate business interests, provided these do not override your rights and freedoms. This may include:

- analysing how our services are used to improve performance and customer experience.



- developing and improving our products, services, and website.
- communicating with you and managing enquiries.
- monitoring and improving customer service and staff training.
- verifying the accuracy of data and maintaining records.
- preventing fraud and ensuring network and information security.
- managing complaints, claims, and legal processes; and
- general business administration and reporting.

You have the right to object to processing carried out on this basis.

Compliance with a legal obligation

We may use your personal data where necessary to comply with legal or regulatory obligations, including:

- verifying your identity.
- responding to requests from public authorities or law enforcement.
- preventing and detecting fraud or other criminal activity; and
- meeting statutory and regulatory requirements.

Vital interests

In limited circumstances, we may use your personal data where necessary to protect your vital interests or those of another individual, for example in relation to urgent health or safety matters.

Consent

Where required, we will rely on your consent to process your personal data. This will include:

- sending you direct marketing communications where you have opted in; and
- processing special category data, such as health information, where this is necessary to provide adjustments or support.

You can withdraw your consent at any time, and this will not affect the lawfulness of any processing carried out before your consent was withdrawn.

6 DATA ANONYMISATION AND USE OF AGGREGATED INFORMATION

We may convert your personal data into anonymised or aggregated data for analytical and business purposes. This means that the information is processed in such a way that you cannot be identified, either directly or indirectly, as an individual.

Once data has been anonymised, it is no longer considered personal data under UK data protection legislation, as it cannot be linked back to you.

We may use this anonymised or aggregated information to:

- analyse trends and usage of our services.
- improve our products, services, and customer experience.
- carry out research and statistical analysis; and
- produce reports for internal use or to share with third parties such as investors or partners.

Where possible, we ensure that any data used for these purposes does not identify individuals and is handled securely.

We may also collect and use aggregated data through the use of cookies and similar technologies on our website. For more information, please refer to our Cookies Policy.

7 OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL DATA

We may share your personal data with third parties where necessary for the purposes described in this policy. In all cases, we take appropriate steps to ensure that your personal data remains protected and is only used in accordance with our instructions and applicable data protection laws.

We may share your personal data with:

Group companies

We may share your personal data with other companies within our group for internal administrative purposes, reporting, and to support the provision of



services to you. This ensures a consistent and efficient service across our organisation.

Suppliers and service providers

We may share your personal data with trusted third-party suppliers and service providers who assist us in delivering our services or operating our business. These may include:

- IT and cloud service providers (including hosting and email services).
- customer relationship management (CRM) and support platforms.
- payment and billing service providers.
- professional advisers such as accountants, auditors, and legal advisers.
- marketing and communications providers; and
- engineers, technicians, and other subcontractors.

These third parties are contractually required to keep your personal data secure and to use it only for the purposes for which it has been shared.

Payment processors

Where you make payments to us, your payment details may be processed by third-party payment providers who specialise in secure payment handling. We do not store full payment card details where this is handled by such providers.

Customer research and feedback providers

We may share your personal data with third-party research organisations who may contact you for the purpose of gathering feedback about our services. Participation in such surveys is typically voluntary.

Business transfers

Your personal data may be transferred to a third party in connection with a business sale, merger, acquisition, restructuring, or similar event. In such circumstances, we will ensure that your data remains protected and is only used for the purposes permitted by this policy.

Legal and regulatory disclosures

We may disclose your personal data where required to do so by law or where necessary to:

- comply with a legal obligation.
- respond to requests from regulators, courts, or law enforcement authorities.
- prevent or detect fraud or criminal activity; or
- protect the rights, property, or safety of our customers, employees, or business.



We only share the minimum amount of personal data necessary for each purpose and ensure that appropriate safeguards are in place to protect your information.

In some circumstances, our suppliers, service providers or support personnel may access personal data from outside the United Kingdom, and where this occurs, we will ensure that appropriate safeguards are implemented in accordance with applicable UK data protection law.

8 WHERE WE STORE YOUR PERSONAL DATA

All personal data that you provide to us is stored on secure servers located within the United Kingdom and/or the European Economic Area (EEA).

In some circumstances, it may be necessary for us to transfer, store, or process your personal data outside of the United Kingdom or the EEA. Where this occurs, we will ensure that appropriate safeguards are in place in accordance with UK data protection law. This may include the use of approved mechanisms such as the UK International Data Transfer Agreement (IDTA) or Standard Contractual Clauses, which are designed to ensure that your personal data is protected to a standard equivalent to that required within the UK.

We take all reasonable steps to ensure that your personal data is treated securely and in accordance with this privacy policy and applicable data protection legislation.

9 HOW LONG WE KEEP YOUR PERSONAL DATA FOR

If we collect your personal data, we will only retain it for as long as necessary to fulfil the purposes for which it was collected, including to satisfy legal, accounting, or reporting requirements. The length of time we retain your data depends on the nature of the information and the purposes for which it is used.

If you make an enquiry or contact us, we will retain your personal data for as long as necessary to respond to and resolve your enquiry.

If you become a customer, we will retain your personal data for the duration of your relationship with us. Once your account is closed, we will retain your personal data for a period of 24 months to allow for any follow-up queries or account reactivation.



If you make a complaint, we will retain your personal data for as long as reasonably required to investigate and resolve the matter.

If you sign up to receive marketing communications, we will retain your personal data for as long as you remain subscribed. If you unsubscribe, we will retain your email address on a suppression list to ensure we respect your preferences.

In some circumstances, we may retain personal data for longer where required to:

- comply with legal or regulatory obligations.
- establish, exercise or defend legal claims; or
- meet other lawful requirements.

We only retain personal data for as long as necessary, in accordance with UK GDPR. When it is no longer necessary to retain your personal data, we will securely delete or anonymise it. We may retain anonymised data for analytical and business purposes.

For further information about our retention periods, please contact us using the details provided in this policy.

10 SECURITY AND LINKS TO OTHER SITES

We are committed to ensuring that your personal data is kept secure. We have implemented appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures are regularly reviewed and updated to ensure they remain effective.

However, the transmission of information via the internet is not completely secure. While we take reasonable steps to protect your personal data, we cannot guarantee the security of data transmitted to our website, and any transmission is at your own risk. Once we have received your personal data, we apply strict security procedures to help prevent unauthorised access.

Where we have provided you with (or you have chosen) a password, security pin, or other access credentials, you are responsible for keeping this information confidential. We ask that you do not share your login details with anyone.

Our website may contain links to websites operated by third parties. This privacy policy applies only to our website and our services, and we do not accept responsibility for the privacy practices of other organisations. If you access third-

party websites using links from our website, we recommend that you review their privacy policies before submitting any personal data.

11 COOKIES

Our website uses cookies and similar technologies to distinguish you from other users, improve your experience, and help us understand how our website is used.

Cookies are small text files that are placed on your device when you visit a website. They allow us to recognise your device and store certain information about your preferences or past actions.

We may use different types of cookies, including:

- **Strictly necessary cookies**, which are essential for the operation of our website and enable core functionality such as security and account access.
- **Analytics cookies**, which help us understand how visitors interact with our website, allowing us to improve performance and usability.
- **Functionality cookies**, which allow us to remember your preferences and enhance your experience; and
- **Marketing cookies**, which may be used to deliver relevant advertising and measure the effectiveness of our marketing campaigns.

You can control and manage cookies through your browser settings, including blocking or deleting them. Please note that disabling certain cookies may affect the functionality and performance of our website.

For more detailed information about the cookies, we use and how to manage your preferences, please refer to our Cookies Policy.

12 MARKETING

We may use your personal data to provide you with information about our services, including updates, offers, and promotions, where we are permitted to do so under applicable law.

We may collect your preferences to receive marketing communications in several ways, including:

- when you make an enquiry or register for an account and indicate your preferences.



- when you sign up to receive newsletters or other communications; or
- when you update your preferences in response to a request from us.

We may contact you via telephone, email, SMS, post, or through targeted online advertising on social media and other digital platforms. Where required by law, we will only send marketing communications where you have provided your consent.

You have the right to opt out of receiving marketing communications at any time. You can do this by:

- using the unsubscribe link in marketing emails; or
- contacting us using the details provided in this policy.

Even if you opt out of marketing, we may still contact you with important service-related communications.

We do not sell your personal data to third parties for marketing purposes.

13 YOUR RIGHTS

Under UK data protection law, you have a number of rights in relation to your personal data. These include:

Right of access

You have the right to request a copy of the personal data we hold about you.

Right to rectification

You have the right to request that we correct or update any inaccurate or incomplete personal data.

Right to withdraw consent

Where we rely on your consent to process your personal data, you have the right to withdraw that consent at any time.

Right to object

You have the right to object to the processing of your personal data where we rely on legitimate interests, and to object to the use of your personal data for direct marketing.

Right to erasure

In certain circumstances, you have the right to request that we delete your personal data.



Right to restrict processing

You may request that we limit the way we use your personal data in certain situations, such as where you contest its accuracy or object to its use.

Right to data portability

Where applicable, you have the right to receive a copy of your personal data in a structured, commonly used, and machine-readable format, and to have it transferred to another provider where technically feasible.

Right to lodge a complaint

You have the right to complain to the Information Commissioner's Office (ICO) if you believe your personal data has been handled unlawfully. Further information is available at www.ico.org.uk.

To exercise any of your rights, please contact us using the details provided in this policy. We may ask you to verify your identity and will respond within the timeframes required by law.

14 CHANGES TO THIS POLICY

We may update this privacy policy from time to time to reflect changes in our practices, legal requirements, or regulatory guidance.

Where we make significant changes, we will notify you by posting an updated version on our website and/or by contacting you directly where appropriate.

Any changes will take effect from the earlier of:

- the date of publication on our website; or
- the date specified in any communication to you.

We recommend that you review this policy periodically to stay informed about how we are protecting your personal data. If you do not agree with any changes, you should stop using our services and contact us if you have any concerns.



15 CONTACT US

Please direct any queries about this privacy policy or about the way we process your personal data using our contact details below.

- **Email:** Our email address for data protection queries is dpo@connexin.co.uk
- **Post:** If you wish to write to us, please write us at DPO, Connexin Limited, K3 Business Park, 200 Clough Road, Hull. HU51SN
- **Phone:** If you would prefer to speak to us by phone, please call 01482 363738