



Privacy Policy V 1.2

Important information and who we are

This is the privacy policy of 2Connect which is a trading name for 2Connect Data Services Ltd. Company Number 06599627

Our registered office is 138 Quay Road, Bridlington, East Yorkshire, YO16 4JB.

This notice describes how we collect, store, transfer and use personal data. It tells you about your privacy rights and how the law protects you.

In the context of the law and this notice, 'personal data' is information that clearly identifies you as an individual or which could be used to identify you if combined with other information.

This notice applies to personal data collected through our website

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

Changes to this privacy notice

Any changes to this privacy notice will be published on our website.

Your duty to inform us of changes to your personal data

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Cookies enable us to:

Conduct transactions on our site;

Estimate our audience size and usage pattern;

Store information about your preferences, and so allow us to customise our site according to your individual interests;

Speed up your searches; and

Recognise you when you return to our site.



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You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

We use the following cookies:

Essential cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. This is statistical information and does not identify any individual.

Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

Third Party Links

Our 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

The type of Personal Information we collect

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 currently collect and process the following information:

Identity Data - personal identifiers such as first and last names

Contact Data - Billing address, delivery address, email address, telephone numbers

Transaction Data - Details about payments or communications to and from you and details of products and services you may have purchased

Technical Data - Internet protocol (IP) address, browser type and version, time zone setting and location, browser plug in type and versions, operating system and platform and other technology on the devices you use to access this website



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Usage Data - Information about how you use our website, products and services including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs)

Marketing and Communication Data - Your preferences in receiving marketing from us, how you wish to communicate with us.

Our use of aggregated Data

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is that which does not identify you as an individual. Aggregated information may be derived from your personal data but is not considered as such in law because it does not reveal your identity.

For example, we may aggregate usage information to assess whether a feature of our website is useful.

However, if we combine or connect aggregated information with your personal data so that it can identify you in any way, we treat the combined information as personal data, and it will be used in accordance with this privacy notice.

If you do not provide personal data we need

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.

Special categories of personal data

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). We do not collect any information about criminal convictions and offences

How we collect your personal information

We collect personal information in the following ways:

Information provided directly by you

Most of the personal information we process is provided to us directly by you when filling in forms or corresponding with us via email or telephone for the following reasons when you:

- Apply for a product or service
- Subscribe to our service
- Give us feedback

Automated technologies or interactions



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As you interact with our website, we automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this data by using cookies, server logs and other similar technologies.

Third parties or publically available sources

We confirm some of the information you provide to us directly using data from other sources and may receive information about you from them. The additional information we collect can be categorised as follows:

Technical Data from analytics providers

Business information, including your business trading name and address, your company number.

Bases on which we use your personal information

The law requires us to determine under which of six defined bases we process different categories of your personal data, and to notify you of the basis for each category.

If a basis on which we process your personal data is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

Most commonly, we will use your personal data in the following circumstances:

Performance of a contract 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** and your interests and fundamental rights do not override those interests.

Where we need to **comply with a legal or regulatory obligation**.

Generally we do not rely on **consent** as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email, post or telephone. We will always ask for your express opt-in consent before we do so and you have the right to withdraw consent to marketing at any time by following the opt-out links on any marketing message we send to you

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data

The table below shows the lawful basis for the ways in which we use your data:



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Purpose/Activity	Type of Data	Lawful Basis
To register you as a new customer	Identity Contact	Performance of a contract
To process and deliver your order: a) Manage payments, fees charges b) Collect and recover monies owed to us	Identity Contact Financial Transaction Marketing & Communications	Performance of a contract Legitimate interests
To manage our relationship with you a) Notifying you about changes to our privacy policy b) Asking you to leave a review	Identity Contact Marketing & Communications	Performance of a contract Legal obligation Legitimate interests
To administer and protect our business and this website (including trouble shooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Marketing & Communications Technical	Legitimate interests Legal obligation
To use data analytics to improve our website, customer relationships and experiences	Technical Usage	Legitimate interests
To make suggestions and recommendation to you about goods or services that may be of interest to you	Identity Technical	Legitimate interests



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Marketing

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

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 or if you provided us with your details when you entered a competition or registered for a promotion 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 company outside our group of companies for marketing of products that are unrelated to our own products or services.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you

Disclosures of your personal data

We may have to share your personal data with external third parties, these include:

Service providers who provide IT and system administration services

Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services

HM Revenue & Customs, regulators and other authorities who require reporting of processing activities in certain circumstances.

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.

Data security

We have appropriate security measures in place 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.



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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.

Data retention

We retain personal information about our customers (including Contact, Identity, Financial and Transaction Data) for legal and tax purposes as well as our accounting and reporting requirements.

To determine the appropriate retention period for personal data, we will consider the amount and nature of the personal data, the potential risk of harm any unauthorised use or disclosure may cause, the purpose for which we process your personal data and whether we can achieve that purpose through other means. We also consider any applicable legal requirements.

In some circumstances we may 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.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. 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 processing it in accordance with the law.

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;



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(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. As we only rely on consent for marketing purposes, if you withdraw your consent, we will still be able to provide products and services to you.

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.

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 to confirm your request in writing by email for example or for further information in relation to your request to speed up our response.

We aim 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.

Complaints

If you have any concerns about our use of your personal information, 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.

The ICO's Address:

Information Commissioner's Office, Wycliffe house, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline Number: 0303 123 1113

ICO Website www.ico.org.uk).

We would however appreciate the chance to deal with your concerns before you approach the ICO.

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