

Privacy Statement

Effective: 25 May 2018

Welcome to the **Connect It Utility Services Limited** (“**Connect It**”, “**we**”, “**us**” or “**our**”) privacy statement.

Connect It respects your privacy and is committed to protecting your personal data.

This privacy statement applies to the processing of personal data that is subject to the European Union General Data Protection Regulation (“**GDPR**”).

Please refer to the Glossary to understand the meaning of some of the terms used in this privacy statement.

Important information and who we are

This privacy statement aims to give you information on how Connect It collects and processes your personal data.

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.

Connect It is the controller for your personal data.

If you have any questions about this privacy statement, including any requests to exercise your legal rights, please contact the Data Privacy Manager using the details set out below.

Contact details

Full name of legal entity: Connect It Utility Services Limited

Email address: jane.leech@cius.co.uk

Postal address: Berrywood Business Village, Units 1&2, Tollbar Way, Hedge End, Southampton, SO30 2UN

Telephone number: 01489 346444

Changes to the privacy notice and your duty to inform us of changes

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.

How We Collect and Process Personal Data

“Personal data” 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. GDPR requires us to have a sound legal basis for processing your information. The list below, while not exhaustive, shows the main categories of information we may collect:

- **Identity data** includes: first name, last name, maiden name, username or similar identifier, title, marital status, date of birth, gender.
- **Contact data** includes: addresses (home, billing, delivery, email), telephone numbers.
- **Financial data** includes: bank account details, payment card details.
- **Recruitment data** includes: resumes, work history, background information.
- **Transaction data** includes: details of payments to and from you, other details of products and/or services you may have purchased from us.
- **Profile data** includes: username and password if relevant, purchases or orders made by you, your interests, preferences and feedback if provided.
- **Usage data** includes: information about how you use our products and services.
- **Marketing and Communications data** includes: your preferences in receiving marketing from us if requested and your communication preferences.
- **Log File data** includes IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data
- **Cookies, Analytics and Related Technologies data** includes those data listed in the “Use of Cookie” section below.

We may also collect, use and share statistical or demographic data (“Aggregated 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.

The table that follows shows the purposes for which personal data might be used and the legal basis for doing so. We have also identified what our legitimate interests are where appropriate.

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

Purpose of processing / activity	Categories of personal data	Legal basis for processing including legitimate interest
To register you as a new customer	Identity Contact	Performance of a contract with you
To respond to questions or comments from you about our products and services	Identity Contact, Profile, Marketing and Communications	Performance of a contract with you; Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services, to develop them and grow our business)
To manage our relationship with you, which may include: (a) Notifying you about changes to our terms and conditions (b) Provision and improvement of our products and services (c) Sending announcements and communications (d) Processing requests (e) Asking you to leave a review or take a survey (f) Considering your application for employment and evaluating your candidacy	Identity Contact, Recruitment, Profile, Marketing and Communications	Performance of a contract with you; Necessary to comply with a legal obligation; Necessary for our legitimate interests (to keep our records updated and 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)	Identity Contact, Usage	Necessary for our legitimate interests in running our business; Provision of administration and IT services; Fraud prevention; Necessary to comply with a legal obligation
To deliver relevant website content and information about	Identity Contact,	Necessary for our legitimate interests (to study how customers use our products/services, to

our products and services to you	Profile, Usage, Marketing and Communications	develop them, to grow our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Contact, Profile, Usage, Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To interact with our business partners and suppliers	Identity, Contact, Profile, Financial, Transaction, Marketing and Communications, Usage	Necessary for our legitimate interests (to operate our business and manage our business suppliers)
To maintain the security of our products and services, for fraud detection, and to protect our rights	Log File data	Necessary for our legitimate interests (to maintain security and protect our rights)
To manage our Sites and email messages and to collect and track information about you and your activities online over time	Cookies, Analytics and Related Technologies data	Necessary for our legitimate interests (to manage our Sites and email to best serve you); Your consent, where applicable

In addition to the uses described above, we may use your personal data for the following purposes, which uses may under certain circumstances be based on your consent, may be necessary to fulfill our contractual commitments to you, and are necessary to serve our legitimate interest in the following business operations:

- Operating our business, administering our products and services;
- Conducting market research, surveys, and similar inquiries to help us understand trends and customer needs;
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of personal data, our website or data systems; or to meet legal obligations; or

- Enforcing our agreements.

We may receive additional personal data from third-party sources, such as public databases, which we may append to existing data, such as email address verification. We may use this supplemental information to process transactions that you request and to prevent fraud, deliver relevant offers to you and to improve our operations, services and products.

Use of Cookies

We use cookies and related technologies (“**Cookies**”) on our websites that link to this privacy statement (“**Sites**”) to administer the Sites. We use the following types of Cookies.

- **Essential Cookies:** These cookies are strictly necessary to provide you with services available through our Sites and to use some of their features, such as access to secure areas and determining whether or not you are an administrator of the Sites. Because these cookies are strictly necessary to deliver our services, you cannot refuse them without impacting how our Sites function.

Automated Decision-making and Profiling

Our Sites are not configured to use any form of profiling or automated decision-making.

How We Share your Information

We may share your information, including your personal data, among our affiliated companies.

We may also share your information with third parties that provide services to us or on our behalf, including marketing and other services that help us operate our business.

The categories of company with whom we may share your data include (but are not limited to):

Payroll providers; insurance companies; life assurance companies; private medical providers; corporate solicitors; pensions providers; travel booking providers; fleet management companies; recruitment companies; mobile phone services; and safety statistic services.

We may also disclose certain personal data as required by law or in connection with a legal claim or proceeding, or as we may reasonably determine to be necessary or appropriate to protect our rights or the rights of others or to avert loss or harm to persons or property.

We may also transfer your personal data to a third party in connection with a merger, sale, reorganization or similar transaction involving all or part of our affiliated companies.

Where we have clearly stated and made you aware of the fact, and where you have given your express permission, we may use your details to send you products/services information through a mailing list system. This is done in accordance with the regulations named in Section 1 above.

International Transfers

We do not plan to share your personal data outside the European Economic Area (EEA) except as noted in the section above.

If we do 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 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.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Your Rights

In cases where our processing of your personal data is subject to the GDPR, you have the following rights as described in more detail below:

- The right to access your personal data
- The right to edit and update your personal data
- The right to data portability
- The right to request to have your personal data deleted
- The right to withdraw consent at any time
- The right to restrict processing of your personal data
- The right to object
- Rights in relation to automated decision making and profiling
- The right to lodge a complaint with a supervisory authority

These rights are not absolute and come with some exceptions according to the law.

The right to access your personal data

You have the right to obtain confirmation that your personal data is being processed, including supplementary information such as what personal data we hold, why we are processing it, with whom we share your personal data, the expected retention period and the safeguards regarding transfers to non-EEA countries, subject to the limitations set out in applicable statutes, regulations and other laws.

If you ask, we will provide you with a copy of your personal data free of charge. We may charge a fee to cover our administrative costs if you request further copies of the same information.

The right to edit and update your personal data

We will comply with your request to edit and update incorrect personal data promptly.

The right to data portability

At your request, we will provide you with your personal data in a structured, commonly used and machine-readable format if:

- you provided us with personal data;
- the processing of your personal data is based on your consent or required for the performance of a contract; or
- the processing is carried out by automated means.

The right to request to have your personal data deleted

Upon receipt of your request, we will delete your personal data promptly if:

- it is no longer necessary to retain your personal data;
- you withdraw the consent which formed the basis of the processing of your personal data;
- you successfully exercised your right to object to processing (see below);
- we processed your personal data unlawfully; or
- the personal data must be deleted for us to comply with our legal obligations.

In so far as practicable, we will inform any third parties we might have shared your personal data with of your deletion request.

We will decline your request for deletion if processing of your personal data is necessary:

- to comply with our legal obligations;
- in pursuit of a legal action;
- to detect and monitor fraud; or
- for the performance of a task in the public interest.

The right to withdraw consent at any time

You have the right to withdraw your consent to our processing of your personal data, where our processing is solely based on your consent. If you withdraw your consent to the use or sharing of your personal data for the purposes set out in this privacy statement, you may not have access to all (or any) of our services, and we might not be able to provide you all (or any) of the services. Please note that, in certain cases, we may continue to process your personal data after you have withdrawn consent and requested that we delete your personal data, if we have a legal basis to do so. For example, we may retain certain information if we need to do so to comply with an independent legal obligation, or if it is necessary to do so to pursue our legitimate interest in keeping the service safe and secure.

If you want to withdraw any consent you may have previously given and/or you do not want to receive email from us in the future, please contact us at jane.leech@cius.co.uk or use the opt-out mechanism provided in our marketing emails.

The right to restrict processing of your personal data

You have the right to limit the processing of your personal data if:

- you dispute the accuracy of your personal data;
- your personal data was processed unlawfully, and you request a limitation on processing, rather than a deletion of your personal data;
- we no longer need to process your personal data, but you need your personal data to establish, exercise or defend a legal claim; or
- you objected to processing based on our legitimate interest and we are in the process of determining whether our legitimate interest identified as the grounds for said processing overrides your rights and freedoms.

Please note that we may continue to store your personal data to the extent required to ensure that your request to limit the processing is respected in the future.

The right to object

You have the right to object to the processing of your personal data for marketing and research purposes (including profiling). You have the right to object from the very first communication from us and every marketing communication we send after. We will stop any marketing related processing of your personal data as soon as we receive your request.

Where we process your personal data based upon our legitimate interest (or that of a third party), then you have the right to object to this processing on grounds relating to your particular situation if you feel it impacts on your fundamental rights and freedoms. We will comply with your request unless we have compelling legitimate grounds for the processing which override your rights and freedoms, or where the processing is in connection with the establishment, exercise or defence of legal claims.

Your rights in relation to automated decision making and profiling

You have the right not to be subject to decisions that are based solely on automated processing (including profiling) if they would produce legal effects or a similarly significant effect on you, unless you gave us your explicit consent or where they are necessary for a contract with us.

The right to lodge a complaint with a supervisory authority

If you wish to complain or seek advice from a supervisory authority, please contact:

Information Governance department
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: +0303 123 1113.

Website: www.ico.org.uk

You can read more about your rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

In order to exercise any of your rights above please email us at jane.leech@cius.co.uk. We seek to respond to your written request within 30 days however it may take longer under certain circumstances.

How We Protect the Information

We take steps to implement and maintain suitable security measures for any personal data we collect. In addition to technological protections such as firewalls and anti-virus software. Access to your personal data is also limited by technical means to those employees, agents and contractors who have an authorised business need to know. All our employees receive appropriate training on Information Security and Data Protection and are subject to non-disclosure agreements. However, no storage or transmission of personal data can be guaranteed to be 100% secure.

Social Media Policy & Usage

We adopt a Social Media Policy to ensure our business and our staff conduct themselves accordingly online. While we may have official profiles on social media platforms, users are advised to verify authenticity of such profiles before engaging with or sharing information with such profiles. We will never ask for user passwords or personal details on social media platforms. Users are requested to conduct themselves appropriately when engaging with us on social media.

There may be instances where our website features social sharing buttons, which help share web content directly from web pages to the respective social media platforms. You use social sharing buttons at your own discretion and accept that doing so may publish content to your social media profile feed or page.

Third Party Websites

This Privacy Statement applies only to the Site and does not apply to websites that are linked to the Site and not operated by or on behalf of us. Links to third-party web sites are provided solely as a convenience to you. All content accessed via links to outside websites belongs to the respective owners of those websites and content and services available via or provided to such websites are governed by the terms and conditions or privacy policies of those websites. When you leave our website, we encourage you to read the privacy statement of every website you visit.

Our retention policy

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 or as needed to resolve disputes or protect our legal rights.

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.

Glossary of terms

EU GDPR: The European Union General Data Protection Regulation. First introduced in 2016, the GDPR came fully into force on 25 May 2018. It is designed specifically to protect the rights of the individual in relation to personal data about them, stored and/or processed by companies or public authorities. It does not apply to personal data held by one private individual about another, for example a personal address book or Christmas card list.

Personal data: Any information relating to an identified or identifiable natural person (the “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Controller: The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Processor: A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Consent: consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Processing: Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Legal basis for processing: The following are the legal bases defined by GDPR, at least one of which must apply, for the purpose of processing personal data:

1. The data subject has given their consent;
2. Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
3. Processing is necessary for compliance with a legal obligation to which the controller is subject;
4. Processing is necessary in order to protect the vital interests of the data subject or of another natural person;
5. Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
6. Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or



fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.