

Emtelle Group Privacy Policy

This privacy policy (“the **Policy**”) applies to the use by you of the Emtelle Website (the “**Emtelle Website**”) <http://www.emtelle.com/>

The Emtelle Website is operated by [Emtelle UK Ltd] (company registration number **SC079486**, registered office address Haughhead, Hawick, Roxburghshire, TD9 8LF) (“**we**”/“**us**”/“**our**”). For the purposes of the processing of personal information described in this Policy, we are the data controller under applicable data protection laws. We are registered as data controller with the Information Commissioner’s Office and our registration number is: ZA327478.

We ask that you read this Policy carefully as it contains important information. The purpose of this Policy is to explain how and why we collect or otherwise process your personal information, what our lawful reasons are for this under data protection laws, what we do with it, what your rights are and what controls you have over our use of it.

Your use of the Emtelle Website is also governed by our Terms of Use. Please ensure you read the Terms of Use.

1. What personal information do we collect?

We use personal information to provide you with further information about the products / services they offer or to assist you in answering any questions or queries you may have submitted. This includes using your details to subscribe you to any email newsletter programme that we operate but only if this was made clear to you and your express permission was granted when submitting any form to email process.

You can contact us through the Emtelle Website. If you do this, we will necessarily collect personal information from you. For this we will collect your name, email address, company name, position in the company and details of your query. If you contact us in other ways including by telephone or post, we will collect your personal information in that way.

In summary, when you contact us, we may collect and process the following personal information about you:

1. your name, job title, position in company,
2. your work-related contact details including company telephone number, [company mobile number], company email address and company postal address.
3. your marketing preferences (if you choose to sign up to the newsletter / direct marketing);
4. information about your computer or mobile device, including where available your IP address, operating system and browser type.
5. Details such as your mobile phone location data, IP address and MAC address.
6. Information about how you use the Emtelle Website collected through cookies (please refer to our cookies policy <http://www.emtelle.com/emtelle-cookie-policy/>)



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and

7. Any other information that you may provide to us through the Emtelle Website including in the free text box on the “Contact” pages of the Emtelle Website where you can write the details of your query.

Sensitive personal data (also known as ‘special categories of personal data’) is a more sensitive category of personal information which relates to a person’s racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning (mental or physical) health or data concerning a natural person’s sex life or sexual orientation. Please do not provide sensitive personal data to us through the Emtelle Website, by telephone, or in any other way.

2. Sources of your personal information

We will collect your personal information from you directly via the Emtelle Website. In addition, we may obtain your personal information and content from other sources such as social media websites.

3. What do we do with the personal information we collect and what are the legal grounds for our processing of your personal information (including when we share it with others) for these purposes?

Data protection laws require us to explain what legal grounds justify our processing of your personal information (this includes sharing it with other organisations). For some processing more than one legal ground may be relevant (except where we rely on a consent). Here are the legal grounds that are relevant to us:

- Processing necessary for **the contract we have with you:**
 1. To check and enforce compliance with the terms of use on this Emtelle Website.
- Processing necessary **for the following legitimate interests** which apply to us and in some cases other organisations (who we list below) and where we have balanced these against your own interests in accordance with data protection laws:
 1. To correspond with you by email, or by telephone, in response to your questions and queries raised through our Website;
 2. To deal with and respond to any communication, enquiry or application which you submit to us;
 3. To test the performance of our internal processes;
 4. To check and enforce compliance with the terms of use on this Website;
 5. To use your personal information to improve our products and services;
 6. To adhere to guidance and best practice issued by the Information Commissioner’s Office;



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7. For management and audit of our business operations including accounting;
 8. To administer our good governance requirements and those of other members of the Emtelle Group of companies, such as internal reporting and compliance obligations;
 9. For market research and analysis and developing statistics;
 10. To customize the Emtelle Website according to your interests, including through cookies (please refer to our cookies policy <http://www.emtelle.com/emtelle-cookie-policy/>)
 11. When we share your personal information with these other people or organisations;
- Members of our Group (this means the Emtelle Group of companies as detailed here (UK, Scandinavia, Germany.)
 - Our legal and other professional advisers and our auditors;
 - Governmental and regulatory bodies such as HMRC, the Information Commissioner's Office;
 - Other organisations and businesses who provide services to us such as back up and server hosting providers, IT software and maintenance providers, document storage providers and suppliers of other back office functions;
 - Buyers and their professional representatives as part of any restructuring or sale of our business or assets;
 - Market research organisations who help us to develop and improve our products and services; and
 - We will also share your data for the purpose of sending out email newsletters and carrying out analytics, using Google Analytics. For email marketing, we use MailChimp. If you would like to review these third parties' privacy notices please refer to the following links: <https://mailchimp.com/legal/privacy/> <https://policies.google.com/privacy?hl=en-GB&gl=uk>
 - Processing necessary **to comply with our legal obligations:**
 1. For compliance with laws and regulations that apply to us;
 2. For establishment, defence and enforcement of our legal rights or those of other members of our Group;
 3. For activities relating to the prevention, detection and investigation of crime;
 4. To carry out monitoring and to keep records (see below);
 5. To deal with requests from you to exercise your rights under data protection laws;
 6. When we share your personal information with these other people or organisations:
 - Law enforcement agencies and governmental and regulatory bodies such as HMRC, the Information Commissioner's Office; and
 - Courts and to other organisations where that is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.
 - Processing with your **consent:**



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1. When you request that we share your personal information with someone else and consent to that; and
2. For our newsletter by email which you sign up for by giving your consent on our Emtelle Website.

4. How and when can you withdraw your consent?

Much of what we do with your personal information is based on other legal grounds. For processing that is based on your consent, you have the right to take back that consent for future processing at any time. You can do this by contacting us (see below). The consequence is that we would not be able to send you our newsletter or other marketing communications unless you re-subscribe.

5. Will your personal information be transferred outside the UK or the European Economic Area?

We have explained that we may disclose your personal information to other members of our Group. This would mean transfers outside the UK and the EEA. Personal Information may in addition be transferred to other locations outside the UK and the EEA for example to our service providers if they or their servers are based there.

When your personal information is processed inside the UK and the EEA it is protected by data protection laws. Some other countries and territories do not have adequate protection for personal information by law. We will make sure that suitable safeguards are in place before we transfer your personal information to those countries.

For more information about suitable safeguards and (as relevant) how to obtain a copy of them or to find out where they have been made available you can contact us (details below).

Safeguards can include: (i) the Standard Data Protection Clauses (also known as EU Model Clauses); (ii) the US Privacy Shield and details are available here: <https://www.privacyshield.gov/welcome>; or (iii) Binding Corporate Rules provided the recipients in other countries have obtained the requisite approvals and the published list of approvals.

6. Direct marketing (using your personal information)

If you consent, we may use your information in order to send you our newsletter by email about our products and services. You can choose to restrict the collection or use of your personal information for direct marketing purposes, as follows. In each direct marketing communication, we send by electronic means (including our email newsletter) we will remind you of how you can prevent further electronic direct marketing. You may do this by using the link provided in the marketing email to send an "UNSUBSCRIBE" request. In addition, you can change your mind at any time about direct marketing by contacting us (details below).

7. How long do we keep your information?



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We will generally hold your personal information in accordance with the following criteria:

- **Retention in case of queries.** We will retain the personal information that we need to keep in case of queries from you;
- **Retention in case of claims.** We will retain the personal information that we need to keep for the period in which you might legally bring claims against us; and
- **Retention in accordance with legal and regulatory requirements.** We will retain the personal information that we need to satisfy our legal and regulatory requirements.
- **If you unsubscribe from our email marketing/our newsletter we will not retain your personal information for any marketing purpose.**

If you would like further information about our data retention practices you can contact us (details below).

8. Aggregated information

We may also convert your personal information into anonymous data and use it (normally on an aggregated statistical basis) for research and analysis to improve the Emtelle Website and/or our products and services.

Anonymised aggregated personal information does not personally identify you or any other user of the Emtelle Website and is therefore not personal information.

9. What are your rights in relation to your personal information?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we will explain at that time if they are engaged or not. To exercise your data protection rights you can contact us (details below).

- The **right to be informed** about your processing of your personal information;
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**;
- The right to **object** to processing of your personal information;
- The right to **restrict processing** of your personal information;
- The right to **have your personal information erased** (the “*right to be forgotten*”);
- The right to **request access** to your personal information and to obtain information about how we process it; and
- The right to **move, copy or transfer your personal information** (“*data portability*”);

You have the right to complain to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/>.



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10. Changes to this Policy

We may change this Policy from time to time by updating this page in order to reflect changes in the law and/or our privacy practices. We encourage you to check this Policy for changes when you revisit the Emtelle Website.

11. Contacting Us

If you have any questions about this Policy, please contact us at data@emtelle.com



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