

# Privacy & Cookie Policy

## 1. About this Policy

Connectus Group Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits our website and will only collect and use personal data in the ways that are described below, in a manner that is consistent with our obligations and your rights under the law.

Our website may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

Please read this policy carefully and ensure that you understand it. You will be required to read and accept this policy when using any form on our website. If you do not accept and agree with this policy, you must stop using our website immediately.

## 2. Definitions & Interpretation

In this policy, the following terms shall have the following meanings:

**“cookie”**

means a small text file placed on the device you use to visit our website which may hold data about you. Details of the cookies used by our website are set out in this policy;

**“Cookie Law”**

means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;

**“GDPR”**

means the General Data Protection Regulation;

**“personal data”**

means any and all data that relates to a person who can be directly or indirectly identified by that data. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and

“we/us/our/our business/Connectus Group Limited”

means Connectus Group Limited Ltd, a limited company registered in England under company number **11109802**, whose registered and main trading address is **Meteor House, First Avenue, Doncaster Sheffield Airport, DN9 3GA**

“our website”

means <https://www.connectus.org.uk>

### 3. Information About Us

#### Connectus Group Limited

Our website is owned and operated by Connectus Group Limited Ltd, a limited company registered in England under company number **11109802**, whose registered and main trading address is **Meteor House, First Avenue, Doncaster Sheffield Airport, DN9 3GA**

#### Our Data Protection Officer

Duncan Shaw

Email: [duncan.shaw@connectus.org.uk](mailto:duncan.shaw@connectus.org.uk)

Tel: 01302 613000

Address: **Meteor House, First Avenue, Doncaster Sheffield Airport, DN9 3GA** Please contact our Data Controller with any enquiries in regards to your data.

### 4. Third Parties Named in this Policy

#### Google

Google LLC (“Google”), located at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States

[Link to Google Policies](#) [Link to Google Analytics Policy](#)

## Facebook

Facebook, Inc., 1601 Willow Road, Menlo Park, CA 94025, United States

If you are in the EU, contact Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

[Link to Facebook Policies](#)

## MailChimp

The Rocket Science Group LLC d/b/a MailChimp, a State of Georgia limited liability company, United States

[Link to MailChimp Policies](#)

## 123 Reg

123 Reg Limited, The Shipping Building, Old Vinyl Factory, 252 – 254 Blyth Road, Hayes, Middlesex, England, UB3 1HA

A provider of internet related services including connectivity, co-location, dedicated and shared server, website hosting and domain name services.

[Link to 123 Reg Policies](#)

## 5. How You Can Control Your Data

As a 'data subject', you have the following rights under the GDPR, which this policy and our use of personal data have been designed to uphold:

- The right to be informed about our collection and use of personal data;
- The right of access to the personal data we hold about you;
- The right to rectification if any personal data we hold about you is inaccurate or incomplete;
- The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you;

- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to use with another service or organisation);
- The right to object to our use of your personal data for particular purposes; and
- Rights with respect to automated decision making and profiling.

In addition to your rights under the GDPR, when you submit personal data via our website, you may be given options to control how we use your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in the footer of our emails).

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

If you have any cause for complaint about our use of your personal data, please contact our Data Controller and we will act accordingly. If we are unable to help, you also have the right to lodge a complaint with the UK’s supervisory authority, the Information Commissioner’s Office (ICO).

For further information about your rights, please contact the ICO or your local Citizens Advice Bureau.

## 6. What Data Do We Collect?

When you submit information using any of the forms on our website, we may collect some or all of the following personal and non-personal data (please also find details of our use of cookies and similar technologies within this policy, which collect other types of data):

- name;

- business/company name;
- job title;
- business website URL;
- email address;
- telephone number;

## 7. Why Do We Collect Your Data?

Our purposes for collecting your data are:

- to provide you with information or services you have requested via our website;
- to inform you of news and offers regarding our services;
- to provide access to our website;
- to personalise and tailor your experience on our website;
- to reply to your correspondence;
- with your permission and/or where permitted by law, to send emails to you which you have opted-in to (you may unsubscribe or opt-out at any time by using the link in our email footer or contacting our Data Controller);
- to analyse your use of our website and gather feedback to enable us to continually improve our website and your user experience;

We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

Our legal basis for collecting your personal data is based on your expressed consent, given via our website.

## 8. How Do We Transmit & Store Your Data?

Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through our website.

Our website holds an SSL certificate, which ensures that data you send or receive through our website is secure and private. Our website is hosted by 123 Reg, whose secure servers ensure your data is transmitted privately. Please find a link to their policies in this policy.

Your personal data is received by Connectus Group Limited and stored within our premises on secure servers, accessible only via our password-protected computers.

## 9. How Long Do We Keep Your Data?

Data you provide to us with your expressed consent for email marketing, is retained for as long as we have your permission to keep it. You may choose to unsubscribe from our emails at any time, using the link in the footer of the email.

If you email us directly, your data is only retained for the time it takes us to process and respond to your email.

We will comply with our obligations and safeguard your rights under the GDPR at all times. You have the right to withdraw your consent to Us using your personal data at any time, and to request that we delete it.

## 10. Do We Share Your Data?

By using our website, you consent to our sharing your data with certain trusted third parties, including Google and Facebook, whose details are set out in this policy.

When you consent to email marketing on our website, your data is shared with MailChimp, whose details are set out in this policy.

Some or all of your data may be stored in the USA, which sits outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using our website and submitting information to us. The

USA has been given an adequacy decision as a data processor by the European Commission.

Please note that we do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.

We will not share any of your data with any third parties for any purposes, unless you have consented to it via our website.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.

We may sometimes contract with third parties to supply services to you on our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

We may compile statistics about the use of our website including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as advertisers. Data will only be shared and used within the bounds of the law.

## 11. How Can You Control Your Data?

You may access our website without providing any data at all. However, to use all features and functions available on our website you may be required to submit or allow for the collection of certain data.

You may restrict our use of cookies.

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge. Please contact our Data Controller for more details.

## 12. Our Use of Cookies

### Introduction to Cookies

This section explains how we use cookies and similar technologies on our website. It explains what these technologies are and why we use them, as well as your rights to control our use of them.

In some cases we may use cookies and other tracking technologies described in this section to collect personal information, or to collect information that becomes personal information if we combine it with other information.

All cookies used by and on our website are used in accordance with current Cookie Law.

### What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by online service providers in order to (for example) make their websites or services work, or to work more efficiently, as well as to provide reporting information.

Cookies set by the website owner (Connectus Group Limited) are called “first party cookies”. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using our Website you may also receive cookies set by parties other than the Website Owner, called “third party cookies”. Third party cookies enable third party features or functionality to be provided on or through the website or

service you are using (such as advertising, interactive content and analytics). The third parties that set these third party cookies can recognise your computer both when it visits the website or service in question and also when it visits certain other websites or services.

## **Why do we use cookies and other tracking technologies?**

We use first party and third party cookies for several reasons. Some cookies are necessary for technical reasons in order for our Website to operate, and others are used to track and target the interests of visitors to our Website. For example, we use cookies to tailor content and information that we may send or display to you and otherwise personalise your experience while interacting with our Website and to otherwise improve the functionality of the Website. Finally, third parties serve cookies through our Website for advertising, analytics, and other purposes.

## **How to control your cookies**

When you visit Our Site, you will automatically receive cookies, and a message will be visible to alert you to this. By continuing to use Our Site you consent to our use of cookies to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies using your browser settings; however certain features of Our Site may not function fully or as intended.

You have the right to decide whether to accept or reject cookies. Some cookies, however, are essential to the functionality of the Website and turning them off may affect its performance.

### **Website Cookie Preference Tool**

You can exercise your Website cookie preferences by visiting the TRUSTe preference centre here <http://preferences-mgr.truste.com/>

### **Browser Controls**

You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our Website though your access to some functionality may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

### **Disabling Most Interest Based Advertising**

Most advertising networks offer you a way to opt out of Interest Based Advertising. If you would like to find out more information, please visit <http://www.aboutads.info/choices/> or <http://www.youronlinechoices.com>.

### **Mobile Advertising**

You can opt out of having your mobile advertising identifiers used for certain types of Interest Based Advertising, including those performed by us, by accessing the settings in your Apple or Android mobile device and following the most recent published instructions. If you opt out, we will remove all data about you and no further data collection or tracking will occur. The random ID we (or our third party partners) had previously assigned to you will also be removed. This means that if at a later stage, you decide to opt-in, we will not be able to continue and track you using the same ID as before, and you will for all practical purposes be a new user to our system.

### **Do Not Track**

Some Internet browsers – like Internet Explorer, Firefox, and Safari – include the ability to transmit “Do Not Track” or “DNT” signals. Since uniform standards for “DNT” signals have not been adopted, our Website does not currently process or respond to “DNT” signals. We take privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard. To learn more about “DNT”, please visit All About Do Not Track.

## **First-party cookies served through our website**

`__cfduid`

Provided by: Cloud Flare

This cookie is used to identify your individual device behind shared IP addresses (e.g. when you use public wifi in shops) and apply security settings specifically for your device. It does not correspond to any user ID, and does not store any personally identifiable information.

**wfvt\_**

Provided by: Wordfence

This cookie contains information about your general geographic location. It is deleted when you leave the site.

**wordfence\_verifiedHuman**

Provided by: Wordfence

This cookie is used by Wordfence to verify you as a human user, for added security.

## **Third-party cookies served through our website**

**\_gat\_UA-**

Provided by: Google

This cookie is used by Google Analytics to track how you found and interact with our website. This information helps us to improve our website by understanding what you are interested in (based on your viewing activity). For more information on what data Google Analytics collects, please refer to their privacy policy, linked at the end of this policy.

**gwcc**

Provided by: Google

This cookie is used by Google Website Call Conversions to tell us if you found our telephone number on our website when you call us.

## **Google Analytics**

Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

The analytics service used by Our Site uses Cookies to gather the required information.

You can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings

## 13. What Happens If Our Business Changes Hands?

We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of

our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this policy, be permitted to use that data only for the same purposes for which it was originally collected by us.

In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your data deleted or withheld from the new owner or controller.

## 14. Making a Complaint

If for whatever reason you wish to make a complaint about us, our team or the services delivered, you may do so. When we receive a complaint we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We will only retain information whilst the investigation is ongoing and will delete any information on completion of the complaints activity.

## 15. Changes to Our Privacy Policy

We may change this policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website and you will be deemed to have accepted the terms of the policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up-to-date.

Last updated: 18th April 2018