



Privacy Policy May 2018

Introduction

Netcelero Limited ("Netcelero", "we", "us") includes its holding company wherever registered or incorporated.

Netcelero is committed to protecting and respecting any personal information you share with us. This statement describes what types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold and how you can contact us.

Sometimes, the contents of this statement may change so you may wish to check this page occasionally to ensure you are still happy to share your information with us. Where possible, we will also contact you directly to notify you of these changes.

This version of our Privacy Notice is live from 25 May 2018.

What information do we collect?

We only collect information that is necessary, relevant and adequate for the purpose you are providing it for.

Personal data you share with us

We may ask for personal data relating to your business, when you order from us; this includes when you order over the phone, website 'call me back' request or when you sign up to our mailing list.

The information we collect includes but is not limited to:

- Company Name (including title);
- Key contact names (including title)
- Delivery Address;
- Billing Address;
- Bank account details;
- Phone number of business and contacts;
- Email address of contacts.

Personal data we receive from other sources

We sometimes obtain information about you or your business from other third parties, including our IT managed service partners if they believe our solutions may be suitable for you. These companies have their own privacy policies explaining how they use and share your personal data. You should carefully review these privacy policies prior to engaging with the third party, to make sure that you are happy with them.



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Personal data we collect about you

We may collect your information when you use Analytics portal and our customer support centre. This data provides us with information about how you use our services and engage with us in order to improve our services and make them more useful to you.

The information we collect includes but is not limited to:

- The date and time you used our services;
- Your IP address;
- Voice recordings of calls you make to our customer service centre;
- Any information within correspondence you send to us;
- Company details (some of which we may obtain from an online or public business directories).

How do we use this information?

Netcelero will only process information that is necessary for the purpose for which it has been collected. You will always have the option not to receive marketing communications from us (and you can withdraw your consent or object at any time). We will never send you unsolicited 'junk' email or communications, or share your personal information with anyone else who might.

There are various ways in which we may use or process your personal information. We list these below:

Consent

Where you have provided your consent, we may use and process your information to contact you from time to time through electronic channels such as email about promotions, events, products, services or information which we think may be of interest to you.

You can withdraw your consent at any time by emailing unsubscribe@netcelero.com or, in relation to any marketing messages you receive, by selecting the unsubscribe option included in those messages.

Contractual performance

We may use and process your personal information where this is necessary to perform a contract such as to fulfil and complete your orders and purchases.

Legal obligation

We may process your personal information to comply with any legal and/or regulatory requirements.

Vital interest

We may need to process your personal information to contact you if there is an urgent safety, or service issue and we need to tell you about it.



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Legitimate interests

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

Processing necessary for us to support customers with sales and other enquiries

In order to support sales and/or queries, we may use your information:

- To respond to correspondence you send to us and fulfil the requests you make to us (for example: sending you information about a new SaaS solution or new product feature).

Processing necessary for us to respond to understanding customers' needs

To develop and improve our relationship with you, we may use your information:

- To analyse, evaluate and improve our products and services, including use of our website, applications, customer service centre, analytics portal, in order to improve your customer experience (where possible we will use data amalgamated from many people so that it doesn't identify you personally);
- To undertake market analysis and research (including contacting you with customer surveys) so that we can better understand you as a customer
- To provide details of SaaS solutions or new features and benefits, by e mail/post/phone that we think your business will be interested in. We will only send email marketing communications to you if you have provided your consent for us to do so;

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

To protect your personal information, we may use your data;

- To verify the accuracy of information that we hold about you
- For network and information security purposes i.e. in order for us to take steps to protect your information against loss, damage, theft or unauthorised access;
- To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- To inform you of updates to our terms and conditions and policies.

How do we share this information?

We do not sell your information to third parties. However, we may from time to time disclose your information to the following categories of companies or organisations to which we pass the responsibility to handle services on our behalf:

- Service providers who help us to, fulfil your orders and deliver our products to you, including:
- Couriers;
- Payment processing providers;



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- Installation subcontractors
- Legal and other professional advisors.
- Certain regulatory bodies, government and enforcement agencies, where required.

We take steps to ensure that any third party partners who handle your information comply with data protection legislation and protect your information just as we do. We only disclose personal information that is necessary for them to provide the service that they are undertaking on our behalf. We will aim to anonymise your information or use aggregated none specific data sets where ever possible.

How long do we keep your information for?

We will not hold your personal information in an identifiable format for any longer than is necessary. If you are a business customer or otherwise have a relationship with us we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.

How can you manage the information we hold about you?

You have the right as an individual to access any personal information we hold about you and make corrections if necessary. You also have the right to withdraw any consent you have previously given us and, in certain circumstances, ask us to erase information we hold about you. You can also object to us using your personal information.

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. We will respond to you within a month after we have received any request (including any identification documents requested).

You have the right to:-

- Ask for a copy of the information that we hold about you;
- Correct and update your information;
- Withdraw your consent (where we rely on it);
- Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information we will always comply with your right to object;
- Erase your information (or restrict the use of it), provided we do not have any lawful reason to continue to use and process that information;
- Provide you your information in a structured data file, where we rely on your consent to use and process your personal information or need to process it in connection with your service.

How to exercise these rights

You can exercise the above rights and/or manage your information by contacting us :-



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Sarah Herman, Data Protection Officer
Netcelero Limited
Suite 6, Plaza 256,
Blanchardstown Corporate Park 2,
Dublin, D15 EP96
IRELAND
Phone: [+353 1 554 8100](tel:+35315548100)
Email: info@netcelero.com

How to lodge a complaint with the data commissioner

You have the right to lodge a complaint with a data protection regulator in Europe, in particular, in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner's Office, the data protection regulator in Ireland, are below:

Office of the Data Protection Commissioner
Canal House
Station Road
Portlington
Co. Laois, R32 AP23

Call :+353 (0761) 104 800

LoCall 1890 25 22 31

Email; info@dataprotection.ie

Keeping You Securely Connected

Suite 6 Plaza 256
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Ireland
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