Wireless Logic Group

Privacy and Cookie Policy

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PRIVACY POLICY

This privacy policy sets out how Wireless Logic Limited uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

IMPORTANT INFORMATION AND WHO WE ARE

This privacy policy gives you information about how Wireless Logic Limited collects and uses your personal data through your use of this website, including any data you may provide when you register with us, sign up to our newsletter, purchase a product or service or take part in a competition.

This website is not intended for children, and we do not knowingly collect data relating to children.

Controller

Wireless Logic Limited is the controller and responsible for your personal data (collectively referred to as "Company", "we", "us" or "our" in this privacy policy.

Wireless Logic Group Limited (Group) is made up of different legal entities. This privacy policy is issued on behalf of the Group so when we mention "Company", "we", "us" or "our" in this privacy policy, we are referring to the relevant company in the Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. Wireless Logic Limited is the controller and responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 9), please contact using the information set out in the contact details section (**Error! Bookmark not defined.**10).

THE TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** We will collect information directly provided by you such as first name, last name, username or similar identifier, company name, title, job role, identification documents (including, passports, driver's license, birth certificate or utility bills), and any information required for security purposes.

- **Contact Data:** We will collect this information which will be directly provided by you which includes, billing address, delivery address for any purchases, email address and telephone numbers.

- **Financial and Transaction Data**: We will collect this information which will be directly provided by you which includes, company bank account details or any other payment details (including invoices and direct debits) which is required when you purchase our products or other similar financial transaction, credit reference information, account information, purchase or account history. We may also collect details about payments to and from you and other details of products and services you have purchased from us.

- **Technical Data:** We will collect this automatically when you use our website, products and services. This includes your IP address, your login data, browser type and version, time zone setting and location, browser

plug-in types and versions, operating system and platform, device ID and name, user journeys, cookie tracking, records of consent (where appropriate), and other technology on the devices you use to access our website. This can be precise where it uses Global Positioning System (GPS) data or by identifying nearby mobile phone masts and Wi-Fi hotspots and you enable location-based services or features. Or less precise where, for example, a location is derived from your IP address or data such as a post code or name of a town or city.

- **Profile Data:** We will collect this information which will be directly provided by you which includes your username and password, hints and similar security information used for authentication and access to accounts and services, purchases or orders made by you, your interests, preferences, feedback (including complaints), survey responses, relevant information from previous investigations, and any other registration details required.

- **Recordings:** Your contact with us, such as a note or recording of a call you make to one of our contact centres, a Chatbot, an email or letter sent, or other records of any contact with us.

- **Usage Data and Marketing Data Usage**: We also collect information about how you interact with and use our website, products and services, and your preferences in receiving marketing and communication from us and our third parties.

- **Recruitment**: We may collect or use the following information for recruitment purposes if you apply for a job through our recruitment portal, and this includes contact details (name, address, telephone number, or personal email address), date of birth, National Insurance Number, copies of passports or other photo ID, employment history, education history, right to work information, details of criminal convictions for certain roles (e.g., DBS), security clearance details (e.g., basic checks and higher security clearance), racial or ethnic origin and religious or philosophical beliefs.

We also collect, use and share **aggregated data** such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you include through:

Your interactions with us. You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you may provide when you, apply for our products or services, create an account on our website, subscribe to our service or publications, request marketing to be sent to you, enter competition, promotions or survey or give us feedback or contact us.

Through your use of our products and services. As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies (small text files stored in your browser), server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy below for further details.

Third parties or publicly available sources. To enhance our ability to provide relevant marketing, offers, and services to you, we may obtain information about you from other sources, such as public databases (such as Companies House), analytics providers (such as Google), advertising networks, joint marketing partners, payment and delivery services, social

media platforms, as well as from other third parties or are the customer of the business that we acquire. We also collect information from certain organisations, where appropriate and to the extent we have legal grounds to do so. These include fraud-prevention agencies, business directories, credit check reference/vetting agencies, billing calculating agencies and connected network providers

Heat Mapping. We use Hotjar to help us understand our users' needs and to optimise this service and experience. Hotjar is a technology service that enables us to build and maintain our service via user experience feedback (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.). Hotjar uses cookies and other technologies to collect data on our users' behaviour and their devices (in particular the IP address (captured and stored but only anonymously), device screen size, device type, browser information, geographic location (country only), preferred language used to display on our website. Hotjar stores this information in a pseudo user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by clicking on this *link*.

Offline data gathering: We may collect personal information from you offline in various situations, such as when you attend our events, through webinars, meet with us in person, speak with a sales representative over the phone, or reach out to our customer service or support teams.

HOW WE USE YOUR PERSONAL DATA

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

(a) **Performance of a contract with you including the provision of services and goods:**

- To process the products and services you've bought from us, deliver equipment to you, and keep you updated with the progress of your order. To provide the relevant product or service to you. This includes other services not included in your agreement with us, services that use information about where you are, and to contact with you messages about changes to the products or services. All of your data protection rights may apply except the right to object.
- To bill you for using our products and services, or to take the appropriate amount of credit from you and contact you if the billing information you provided us with is about to expire or we're not able to take payment.
- We will contact you with customer service messages to keep you updated with current information about products and services you've taken. For example, changes to our terms and conditions or service interruptions.

(b) **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). All of your data protection rights may apply, except the right to portability.

(c) **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

(d) **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	**Type of data**	**Legal basis [and retention period]**
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (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)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the

		context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send you relevant marketing communications (e.g., white paper and direct mail) and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) **OR** Consent, having obtained your prior consent to receiving direct marketing communications
To carry out market research through your voluntary participation in surveys		Necessary for our legitimate interests (to study how customers use our products/services and to help us improve and develop our products and services).

Direct marketing

Marketing Communication refers to the various methods we use to inform customers about our products and services for commercial purposes. We may send you marketing emails if you have given your specific consent or if you are an existing customer of similar Wireless Logic Limited products and services. Additionally, we may send offers through regular mail, SMS, social media, coupons, or other communication channels. With your consent, we may use your

personal information to provide personalised offers based on your interests and usage of Wireless Logic Limited products, services, and digital channels.
We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which product, services and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can opt out of marketing communications at any time by clicking the unsubscribe link in any of our marketing emails.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes for example relating to order confirmations for a product/service warranty registration, appointment reminders, updates to our Terms and Conditions, checking that your contact details are correct.

Cookies

We use "cookies" on our websites and applications. A cookie is a piece of data stored on a site visitor's hard drive to help us improve your access to our site and identify repeat visitors to our site.

For more information about the cookies, we use and how to change your cookie preferences, please see Cookie Policy below.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data where necessary with the parties set out below for the purposes set out in the table Purposes for which we will use your personal *data* above. More detail about the specific parties and the data they receive can be requested from Wireless Logic using the contact details above.

Where applicable, we share information about you with:

- Companies in the Wireless Logic Group Limited.
- Partners, suppliers or agents involved in delivering the products and services you've ordered or used e.g., mobile network operators who give access to their radio and data network, infrastructure partner who provides data location facilities and Internet service providers who provide access to data networks.
- Companies who are engaged to perform services for, or on behalf of, Wireless Logic Limited, or Wireless Logic Group Limited.
- Credit reference, fraud-prevention or business-scoring agencies, or other credit scoring agencies or financial institutions and banks in order to process payments.
- Debt collection agencies or other debt-recovery organisations.
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law. This would include any legitimate claims made under the Regulation of Investigatory Powers Act by the Police.
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement.

- Other third parties when you are signing up to their service and it is used by them for authentication and fraud-prevention purposes.
- Third parties that we advertise with in order to serve you advertisements online (e.g. Facebook, Google, Twitter, Amazon). We share aggregated demographic information with our partners and advertisers. This is not linked to any personal information that can identify any individual person. You can opt-out of this by managing your account permissions. To do this see the 'Your Rights' section below.
- We sometimes use outside companies to ship orders, perform credit checks, process payment and bill users for goods and services. These companies do not retain, share, store or use personally identifiable information for any secondary purposes beyond filling your order.
- We may partner with other parties to provide specific services connected with your order. When the user signs up for these services, we will share names, or other contact information that is necessary for the third party to provide these services. These parties are not allowed to use personally identifiable information except for the purpose of providing these services.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

  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.

INTERNATIONAL TRANSFERS

In order to provide our goods and services we may need to transfer your information from your country of residence to another country in the usual course of our business. By dealing with us and submitting your personal information, you agree to the transfer, storage, and/or processing of your personal information outside of your country of residence as set out below.

- We may share your personal data within the Wireless Logic Limited Group. This may involve transferring your data outside the UK to our overseas offices.

- Wireless Logic only transfers personal data to those third parties where we can be sure that we can protect data subjects' privacy and rights, for example where the third party is located in a country deemed to have adequate data protection laws in place, or where we have a contract in place with that third party, including the European Commission's standard data protection clauses. We also conduct data transfer impact assessments to ensure that, where a third party is located in a country whose local laws may cause a risk of undermining data protection rights, that appropriate technical, organisational or contractual supplementary measures are in place with that third party.

- Now that the UK has left the EU, the UK has become a 'third country' for data protection transfers from the European Economic Area ('EEA') under the GDPR. However, the EU Commission announced on 28 June 2021 that adequacy decisions for the UK have been approved to allow the continued free flow of personal data from the EEA to the UK. For data transfers from the UK, there are currently no changes to the way personal data is sent to the EU/EEA and other countries deemed adequate by the EU. The UK government has stated their

commitment to maintaining the high standards of the GDPR (General Data Protection Regulation) and the GDPR has been retained in UK law alongside the existing Data Protection Act 2018.

We have put in place appropriate security measures 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.

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

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. In some cases, we may retain your information for an indefinite period. We regularly review and assess our data retention practices to ensure that data is kept only as long as it is relevant and necessary for legitimate business or legal purposes. In some instances, you can ask us to delete your data: see paragraph 8 below for further information.

In some circumstances we will 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

You have a number of 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 "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **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 in certain circumstances**. 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) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

- **You also have the absolute right to object** any time to the processing of your personal data for direct marketing purposes (see Opting Out of Marketing) in paragraph 4 for details of how to object to receiving direct marketing communications).

- **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.

- **Request restriction of processing of your personal data**. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:

- **If you want us to establish the data's accuracy;**
    - Where our use of the data is unlawful but you do not want us to erase it;
    - 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
    - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us see Contact details (paragraph 9).

No fee usually required

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 could refuse to comply with your request in these circumstances.

What we may need from you

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 for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could 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.

CONTACT DETAILS

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

1. **Email address:** legal@wirelesslogic.com
2. **Postal address:** The Davidson Building, Forbury Square, Reading RG1 3EU, United Kingdom
3. **Telephone number:** +44 (0) 330 056 0330 or the local contact in your country. Please see *contact us* for more information.

COMPLAINTS

If you are dissatisfied with our processing of your personal information, you may have the right to lodge a complaint with your local data protection authority. We would, however, appreciate the chance to deal with your concerns before you approach the local regulator so, please contact us in the first instance. If you wish to know more about this process, please contact us and we will endeavour to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. 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, for example a new address or email address.

Third-party links

This website contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.