

How Texecom Limited uses your information

1 Who we are

We are Texecom Limited, a company incorporated in England and Wales with registered number 2084170.

Our contact details are as follows:

Address: Texecom, Bradwood Court, St Crispin Way, Haslingden, Lancs, BB4 4PW
Telephone: 01706 234800

If you have any queries about this notice or Texecom's data protection compliance measures, please contact us at dataprotection@texe.com.

2 How we collect your personal data and why

Texecom Limited (**we, us, our, Texecom**) may need to collect personal data about you and there are different ways that we might do so; this privacy notice tells you what to expect when we collect personal data on:

- (a) **Visitors to our websites**, <http://www.texe.com/> and <http://www.klaxonsignals.com/>;
- (b) anyone who interacts with us or contacts us through **Social media**
- (c) people **Contacting us**;
- (d) people **Subscribing to our Texecom Registered Installer Scheme**; and
- (e) people using our **TexecomPro App**.

Under data protection legislation we are only permitted to use your personal data if we have a legal basis for doing so as set out in the data protection legislation.

In sections 2.2 – 2.5 below, we will specify one of following legal bases for each usage of your personal data:

- Where we need information to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation; or

- Where we need your information because it is in our legitimate interests (or those of a third party) to use it and your interests and fundamental rights do not override those interests.

Please note that other products and services we provide to you may be subject to separate privacy notices, such as (for example), our Texecom Cloud services and our Texecom Connect app. Where this is the case, we will bring these privacy notices to your attention separately.

2.2 Visitors to our websites

Our websites, <http://www.texe.com/> and <http://www.klaxonsignals.com/>, are managed by Net-workers Organisation Limited (**Net-workers**). As part of the service provided by Net-workers, they will help to maintain the security and the performance of our websites by (i) protecting user connections (ii) using third party scanning services to scan against known web attacks (iii) investigating site errors and (iv) providing secure hosting services.

Please note that Net-workers procure hosting services for Texecom through The Positive Internet Company Limited for <http://www.texe.com/> and through Elite Limited for <http://www.klaxonsignals.com/>.

All of the hosting services provided to Texecom are based in the UK.

In using our websites, you will submit your personal data that we require because it is in our legitimate interest. It is in both of our interests to process this personal data to help manage our websites and create a user friendly experience for you, which we explain in more detail in sections 2.2.1 and 2.2.2 below.

2.2.1 Cookies

Cookies are small files of letters and numbers that we store on your browser or the hard drive of your device. Like most websites, we use cookies on our websites on the basis that it is in our legitimate interests. There are different types of cookies that we use for different purposes; however generally speaking cookies help us to distinguish you from other users of our websites, which allows us to provide you a better experience and also allows us to improve our websites.

You can block cookies at any time by activating the setting on your browser that allows you to refuse some or all cookies. However, if you do block cookies there may be parts of our websites that you will be unable to access or that will not function properly.

Our cookies help to:

- make our websites work as you would expect;
- remember your settings during and between visits;
- improve your and other users' experiences of the websites;
- allowing you to sign up to marketing and updates if you have requested to do so;
- remembering if we have already asked you certain questions; and
- improve the speed/security of our websites.

For more information about cookies and how we use them, please see our [cookies policy](#).

2.2.2 Third party services

- (a) Whenever you visit our websites, <http://www.texe.com/> or <http://www.klaxonsignals.com/>, Networkers will use a third party service, Google Analytics, on our behalf and on the basis that it is in our legitimate interest, to collect standard information about your website use, such as internet logs and details of your visitor behaviour patterns. The reason we use this service is so that we can find out how many people visit the websites and the various parts of the websites. This information is necessary because it helps us to find out how our websites are working and how to improve it. We do not identify anyone, and we do not make or allow Google Analytics to (or attempt to) identify anyone visiting our websites.
- (b) We use a third party, Dotmailer, to send you confirmation and marketing emails after you have contacted us. The third party is only provided with your email address and will never use it for any other purpose.

2.3 Social media

Our websites contain links to our social media pages. Any information you provide to us via social media (including messaging, "liking", "following" and other communications) is controlled by the social media network. We currently use:

- a) Facebook, which has its own privacy notice that can be located at <https://www.facebook.com/privacy/explanation;>
- b) LinkedIn, which has its own privacy notice that can be located at <https://www.linkedin.com/legal/privacy-policy;>
- c) Twitter, which has its own privacy notice that can be located at [https://twitter.com/en/privacy;](https://twitter.com/en/privacy)
- d) Instagram, which has its own privacy notice that can be located at [https://help.instagram.com/155833707900388;](https://help.instagram.com/155833707900388) and
- e) Website Toolbox for access and use of the forum (as further described in section 2.5.2 below), which has its own privacy notice that can be located at [https://www.websitetoolbox.com/privacy.](https://www.websitetoolbox.com/privacy)

We recommend that you read their privacy notices and contact them directly if you have any concerns regarding their use of your personal data.

2.4 Contacting us

Our websites provide you with different ways to contact us. All communications are handled, reviewed and responded to internally by us.

Please note, however, that:

- (a) email monitoring or blocking software may also be used and that you have a responsibility to ensure that any email you send to us is within the bounds of the law;
- (b) we use Natterbox for our sales and support call system, which provides caller ID services, we will only use this information for the purposes of handling your call and contacting you in relation to the purpose of your call; and
- (c) we use Salesforce to store contact information for all of our customers and people who contact us, we will only use this information to contact you to respond to your queries or requests

As part of communicating with us, you will also submit personal data about you that we require. We collect this information on the basis that it is in our legitimate interest to do so. This includes your name, address, additional contact details and details about your query. It is in both our and your interest for us to process this information so we can deal with your query effectively.

Any personal data that is provided in and during communications with us is used only for the purpose of reviewing the communications and conducting the ongoing administration and management of communications. We will not use your personal data in an identifiable manner in any publication without your further explicit consent.

We will delete this personal data when we reasonably consider that we no longer need it for this purpose.

Please note that we may need to contact you about your enquiry through email or telephone. Please make sure that you keep us updated of any changes to your contact details.

2.5 Subscribing to our Texecom Registered Installer Scheme

In this section 2.5, we describe how we collect and use your personal data when you access services through our Texecom Registered Installer Scheme (either via our TexecomPro App or our website <http://www.texe.com/>).

2.5.1 Your Texecom Registered Installer Scheme account and marketing communications

We will collect the following contact details if you have opted to subscribe and create log-in credentials to access our Texecom Registered Installer Scheme (**Texecom Account**):

- (a) **via our website <http://www.texe.com/>:** we will collect your title, name, address, phone number, email address, company name and other personal data you may provide to us including the position you hold in your company, fax and other address details; or
- (b) **via our TexecomPro App:** we will collect your title, name, email address and other personal data you may provide to us including your phone number.

This is on the basis that it is in our legitimate interest. It is in both of our interests to use your personal data to administer your Texecom Account and send you our e-newsletter and information about products, goods or services we think might be of interest to you. Whenever we contact you we will provide you with a clear choice to opt out of receiving our marketing communications, which can be updated by clicking the unsubscribe option at the bottom of all of our emails.

We use a third party, Dotmailer to manage our marketing communications distribution. If you ever decide you no longer wish to receive our marketing communications, you can do so at any time by unsubscribing from the mailing list, using the link provided in the marketing communications email. If you do unsubscribe, please note that Dotmailer will still keep your email in a separate secure list on our behalf so that we can make sure that you do not receive our newsletter again in the future.

Where you log-in to our TexecomPro App with your Texecom Account, we will also send you marketing communications and information about our products, goods or services by presenting you with push notifications. You can opt out of receiving these types of push notifications by updating your device settings.

It is necessary for you to provide us with your contact details in order for you to enter into a contract with us for provision of the Texecom Registered Installer Scheme. If you do not provide us with your contact details, we will be unable to enter into a contract with you for you to access the services we offer through our Texecom Registered Installer Scheme.

Please note that you will use these same log-in credentials whether you are accessing the services through our website (<http://www.texe.com/>) or our TexecomPro App.

2.5.2 Use of the Texecom forum

As part of the services we offer through our Texecom Registered Installer Scheme, you will be able to access a forum where you can post content and connect with other forum users that hold a Texecom Account. You will access this forum via a third party, Website Toolbox (please see section 2.3(e) for the link to Website Toolbox's privacy notice).

In order to monitor your compliance with the forum guidelines and to assist you with any queries you may have, Website Toolbox provides us with access to the forum and we collect your forum username, your name, email address and any other personal data you submit to the forum or provide to us. This is on the basis that it is in our and your legitimate interests to assist you with your queries and ensure that all users of the forum comply with the guidelines and treat others fairly.

2.5.3 Third party access to your information

We use third parties to provide services to us from time to time, and we will share personal data with them where it is in our legitimate interests for our business administrative needs. A list of third parties that we use and how they process personal data is set out below:

Third party	What data?	Why do we share this data?	How long is this data kept by this third party?
UK Fast.Net Ltd	<ul style="list-style-type: none"> • your contact details; • your log-in credentials; and • details about your device (including the type of device you use, device operating system, mobile network information and a unique device identifier, such as your device's IMEI number) (device details). 	For the hosting of our servers	<p>We are responsible for deleting your personal data from the services of our cloud hosting service providers.</p> <p>We will retain this personal data for as long as you are an active user of our Texecom Registered Installer Scheme and delete this personal data when we reasonably consider we no longer need it for this purpose.</p>

Third party	What data?	Why do we share this data?	How long is this data kept by this third party?
Positive Internet Company Limited	<ul style="list-style-type: none"> • your contact details; • your log-in credentials; and • your device details 	For the hosting of our servers	<p>We are responsible for deleting your personal data from the services of our cloud hosting service providers.</p> <p>We will retain this personal data for as long as you are an active user of our Texecom Registered Installer Scheme and delete this personal data when we reasonably consider we no longer need it for this purpose.</p>
Blue Chip Marketing UK Ltd (Blue Chip)	<ul style="list-style-type: none"> • your contact details; • your log-in credentials; and • your device details 	<ul style="list-style-type: none"> • to manage and facilitate the log-in process for the Texecom Registered Installer Scheme across our website and the TexecomPro App; and • develop, manage and maintain the TexecomPro App on our behalf 	<p>We are responsible for setting retention periods with Blue Chip.</p> <p>We will retain this personal data for as long as you are an active user of our Texecom Registered Installer Scheme and delete this personal data when we reasonably consider we no longer need it for this purpose.</p>
	Information about your use of the TexecomPro App and related analytics. This information does not identify anyone and we do not allow Blue Chip to identify anyone.	To find out how our TexecomPro App is working and how we can improve your user experience for you	<p>We are responsible for setting retention periods with Blue Chip.</p> <p>We will retain this personal data for as long as you are an active user of our Texecom Registered Installer Scheme and delete this personal data when we reasonably consider we no longer need it for this purpose.</p>

2.5.4 **TexecomPro App – additional uses**

In addition to the purposes for which we process your personal data (as set out in sections 2.5.1 – 2.5.3 above), where you download and use the TexecomPro App, we will also collect your personal information for the following purposes and rely on the following legal bases for processing:

- (a) To monitor compliance with our TexecomPro App terms of use and to deliver our services to you, we will collect your contact details, log-in credentials and your device details and in this case, our processing is necessary for performance of the contract we have entered into with you for provision of the TexecomPro App;
- (b) To administer and protect our business and the TexecomPro App (including undertaking troubleshooting, data analysis and system testing), we will collect your contact details, log-in credentials and device details on the basis that it is in our legitimate interests (including for running our business, provision of administration and IT services and network security); and
- (c) In order to administer your Texecom Account, in addition to collecting your contact details (as set out above), we will also collect your device details on the basis that it is in our and your legitimate interests to facilitate the smooth running of the services.

We will retain the above personal data for as long as you are an active user of our Texecom Registered Installer Scheme and delete this personal data when we reasonably consider we no longer need it for this purpose.

3 Disclosure of personal data

We will not usually disclose your personal data other than as already explained in Section 2 above. However, there may be circumstances where we need to share personal data other than as anticipated in Section 2 above. These include:

- 3.1.1 where communication is made in a language other than English, we will use third party translation services to translate the communication or application and all of its content; the third party will not use the personal data for any other purpose;
- 3.1.2 where we are legally required to disclose the information. This includes sharing the personal data with tax authorities and law enforcement agencies for the purposes of the prevention and detection of crime;
- 3.1.3 where we need to disclose the personal data for the purpose of or in connection with any legal proceedings, or for the purpose of obtaining legal advice, or the disclosure is otherwise necessary for the purposes of establishing, exercising or defending legal rights;
- 3.1.4 disclosure is required to protect the our interests, or someone else's interests (for example, to prevent fraud);
- 3.1.5 disclosure is necessary to protect your vital interests (for example if you are unwell at our premises, we may need to seek medical assistance);
- 3.1.6 it is to a third party for the purposes of providing administrative or processing services on our behalf. If such disclosure is required we will take steps to ensure that the third party protects the personal data in the same way that we do and notify you of any changes to this privacy notice; and
- 3.1.7 to any prospective purchaser of our business assets or organisation.

4 Keeping personal data secure

We know that you provide your personal data in good faith and expect it to be looked after. This is why we take the security of your personal data seriously. This means that we have taken steps internally in order to ensure that our systems adequately protect your personal data. This includes:

- (a) locating all personal data that we control on servers located in the United Kingdom;
- (b) ensuring strict access controls on a need to know basis;
- (c) monitoring access to the personal data; and
- (d) double encryption of the personal data transferred between us and the following third parties: Natterbox, Salesforce and Dotmailer.

5 Your rights

You have rights in respect of your personal data and this Section explains a bit more about those rights that are applicable to what we do with your personal data and when you can exercise them. If you would like more information about any of your rights, please contact us on the contact details set out [above](#).

5.1 Accessing your personal data

We want you to fully understand and be comfortable with how we use your personal data. If you register with us, you will be able to access and update some of the personal data we hold about you by logging into your account through our websites.

In addition, you can contact us at any time to ask whether we process any personal data about you. If we do hold or use your personal data in any way, you have the right to access that personal data. All we ask is that:

- 5.1.1 you make your request to access in writing to the contact details set out [above](#);
- 5.1.2 you verify your identity; and
- 5.1.3 you are fair and reasonable with how often you make this kind of request.

Please allow us up to one month from receipt of your request in order to provide a response.

5.2 Requesting more information

We hope that you can understand that it is very difficult to cover all the possible ways in which we collect and use personal data. We have tried to be as clear and as open as we can and will continue to update this privacy notice as our use of personal data develops. However, if you have any questions regarding our use of your personal data, we will be happy to give you peace of mind by answering any questions or providing any additional information that we can. If you do have any specific questions, or need anything explaining, please get in touch on contact details set out [above](#).

5.3 Additional rights

You will also have some additional rights that you may exercise as set out here. We may publish a policy, from time to time, to explain how we will handle such requests and what you can expect from us when you make a request to exercise your rights. If we do publish any such policy, we will provide a link to it here. In each instance we may ask you to make your request in writing to the contact details set out [above](#) and provide verification of your identity.

- 5.3.1 You have the right to request that we rectify any inaccuracy about you that we may hold, in which case we may ask you to verify the corrected information (for example, we may ask for a recent utility bill for proof of change of address)
- 5.3.2 You have the right to request that we erase your personal data. Please be aware that we can only comply with such a request if:
 - (a) your personal data is no longer required for the purposes it was collected for (for example, we need your personal data to respond to a communication);
 - (b) the collection, storage or use of the personal data by us is prevented by law; and
 - (c) your personal data is not required for the purposes of establishing, exercising or defending a legal claim such as in the conduct of legal proceedings.
- 5.3.3 You have the right to request that we restrict or refrain from processing your personal data:
 - (a) for the time it takes us to verify the accuracy of your personal data where you have disputed its accuracy;
 - (b) where the collection, storage or use of the personal data by us is unlawful but you decide not to ask for erasure;
 - (c) where we no longer need your personal data but you need them for the purposes of establishing, exercising or defending a legal claim; and
 - (d) for the time it takes to determine whether we have an overriding legitimate ground to continue to process your personal data, where you have exercised your right to object to processing.
- 5.3.4 You have the right to data portability in respect of information we have collected from you based on consent or for the reason of entering into a contract. If you exercise this right, we will transfer a copy of the information that you have provided to us at your request.
- 5.3.5 You have the right to object to our use of your personal data:
 - (a) where we are using that information on the basis that it is in our legitimate interests to do so, and where we do not have compelling overriding grounds to continue to use your personal data; or
 - (b) at any time, where we use your personal data to send you the newsletter or any other type of direct marketing, in which case it will no longer be used for that purpose, but may use it for another lawful purpose.

6 Complaints

You are important to us, as is protecting your personal data. We have high standards when it comes to collecting and using personal data. For this reason, we take any complaints we receive from you about our use of your personal data very seriously and request that you bring any issues to our attention.

Where you are communicating with us for the purpose of making a complaint, we will only use your personal data to handle, investigate and respond to the complaint and to check on the level of service we provide. Where the complaint is about a member of our team, we may have to disclose your identity to whoever the complaint is about. You may let us know that you don't want information that identifies you to be disclosed and we will try to respect your request; however, it may not be always possible to handle a complaint on an anonymous basis.

If you are unhappy, you can also contact the Information Commissioner's office to make a complaint directly. Here is a link to the ICO's website <https://ico.org.uk/global/contact-us/>.

7 Updating this privacy notice

We keep our privacy notice under regular review in order to ensure that it properly reflects our use of personal data. This privacy notice was last updated on 25 September 2018.