

Texecom Limited
Texecom Connect App Privacy Notice

Privacy notice

This notice explains how Texecom Limited (referred to in this notice as **Texecom, we or us**) collects and uses your personal information in connection with the use of our Texecom Connect App (the **App**), which enables users (referred to in this notice as **users or you**) to exercise basic control of your alarm system including, but not limited to, arming, part arming, disarming and resetting your alarm system.

This privacy notice is to inform you about:

How to contact us

What is personal information?

How do we collect personal information and what information do we collect?

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The table at the end of this notice provides an overview of the data that we collect, the purposes for which we use that data, the legal basis which permits us to use your information and the rights that you have in relation to your information.

We will treat all of your personal information as confidential and in accordance with the Data Protection Legislation and your personal information will only be shared with others in accordance with this privacy notice.

We keep this privacy notice up to date, so if there are any changes to the way in which your personal information is used this privacy notice will be updated and we will notify you of the changes.

How to contact us

Our contact details are as follows:

Address: Texecom Ltd, St Crispin Way, Haslingden, Lancashire, BB4 4PW
Email: dataprotection@texe.com
Telephone: 01706234800

What is personal information?

Personal information is any information that tells us something about an individual. This could include information such as name, contact details, phone number or date of birth.

How do we collect personal information and what information do we collect?

Active collection

The App actively collects information by permitting you to provide your:

- email address(es);
- alarm site name (nominated by you e.g. 'Home');
- user code; and
- password.

You will be informed at each active information collection point what information is required and what information is optional.

Passive collection

As you use the App, we collect the following information passively (that is, gathered without you actively providing the information):

- the country in which you are based, as determined via the App Store you used to download the App;
- device identifier; and
- IP address.

In addition to the above categories, each time you use the App, we will automatically collect information about your use of the App including user or panel names, however, you cannot be identified in relation from this information. If you do not want to send this information to us, you can change your alarm system settings by following the instructions in the user manual.

How do we use your information?

We use the information we collect about you:

- to verify your App profile and location;
- to provide the service to you (including to enable emails and push notifications to be sent to you) and to communicate with you about your use of the App;
- to provide you with information about our latest products and services by way of push notifications and email;
- to monitor compliance with the Terms of Use of the App; and
- to comply with the law or applicable regulations and co-operate with competent authorities.

What is the legal basis that permits us to use your information?

Under Data Protection Legislation we are only permitted to use your personal information if we have a legal basis for doing so as set out in the Data Protection Legislation. We rely on the following legal bases to use your information in relation to the App:

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

- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We have also set out the remaining legal bases as follows for your information:

- Where we need to protect your interests (or someone else's interests);
- Where you provide your consent for the processing;
- Where it is needed in the public interest or for official purposes.

If we need to rely on any of these additional legal bases for any processing of your personal data, we will notify you and provide details of how your personal data is being processed.

The table at the end of this notice provides more detail about the information that we use, the legal basis that we rely on in each case and your rights.

What happens if you do not provide information that we request?

We need some of your personal information in order to perform our contract with you to provide the App. For example, we need to know a valid email address if you require us to send you email notifications about alarm events.

Where information is needed for these purposes if you do not provide it we will not be able to offer our services to you. We explain when this is the case at the point where we collect information from you.

How do we share your information?

We disclose your personal information:

- to our affiliates;
- to our agents, consultants and sub-contractors who assist us in running our business, including this App, and who are subject to appropriate security and confidentiality obligations;
- if the whole or a substantial part of our business is to be sold or integrated with another business, to our advisers and any prospective purchasers (and their advisers); and
- where we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation or request.

Where we share your personal information with third parties we ensure that we have appropriate measures in place to safeguard your personal information and to ensure that it is solely used for legitimate purposes in line with this privacy notice.

How do we keep your information secure?

We will take appropriate measures to keep your information confidential and secure in accordance with our internal procedures covering the storage, access and disclosure of information.

Please note that messages you send to us by e-mail or via any internet connection may not be secure. If you choose to send any confidential information to us by such means you do so at your own risk with the knowledge that a third party may intercept this information and we do not accept any responsibility for the security or integrity of such information. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

When do we transfer your information overseas?

We do not send your personal data outside of the European Economic Area. If this situation changes, we will notify you and provide details of the appropriate safeguards in place to protect your personal information.

For how long do we keep your information?

As a general rule we keep your personal information for as long as you retain a user profile on the App. Please note we will not retain any of your personal data longer than is necessary for the purposes for which it was collected and all personal data will be retained in accordance with our Data Retention Policy.

However, where we have statutory obligations to keep personal information for a longer period or where we may need your information for a longer period in case of a legal claim, then the retention period may be longer.

Your rights in relation to your information

You have a number of rights in relation to your personal information, these include the right to:

- be informed about how we use your personal information;
- obtain access to your personal information that we hold;
- request that your personal information is corrected if you believe it is incorrect, incomplete or inaccurate;
- request that we erase your personal information in the following circumstances:
 - if Texecom is continuing to process personal data beyond the period when it is necessary to do so for the purpose for which it was originally collected;
 - if Texecom is relying on consent as the legal basis for processing and you withdraw consent;
 - if Texecom is relying on legitimate interest as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing;
 - if the personal data has been processed unlawfully (i.e. in breach of the requirements of the Data Protection Legislation); or
 - if it is necessary to delete the personal data to comply with a legal obligation;
- ask us to restrict our data processing activities where you consider that:
 - personal information is inaccurate;
 - our processing of your personal information is unlawful;
 - where we no longer need the personal information but you require us to keep it to enable you to establish, exercise or defend a legal claim; or
 - where you have raised an objection to our use of your personal information;
- request a copy of certain personal information that you have provided to us in a commonly used electronic format. This right relates to personal information that you have provided to us that we need in order to perform our agreement with you and personal information where we are relying on consent to process your personal information;
- object to our processing of your personal information where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection we will carry out an assessment to determine whether we have an

overriding legitimate ground which entitles us to continue to process your personal information; and

- not be subject to automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights or find out more, please contact us at dataprotection@texe.com. The table at the end of this notice provides more detail about the information that we use, the legal basis that we rely on in each case and your rights.

Complaints

If you have any complaints about the way we use your personal information please contact us at dataprotection@texe.com and we will try to resolve the issue. If we cannot resolve your complaint, you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK who you can contact by visiting <https://ico.org.uk/global/contact-us/>).

Quick check table of Texecom's use of your personal information

Purpose	Data used	Legal basis	Which rights apply?*
Verification of App profile and location	Actively and Passively collection information	Contractual necessity. We require this information to be able to provide the App service to you and fulfil our obligations under the Terms of Use.	The generally applicable rights plus the right to data portability.
Notifications regarding App usage	Actively and Passively collection information	Legitimate interest. This usage is in our legitimate interest, and your interest as an App user, as it allows us to communicate with you in the most efficient way possible about your alarm system.	The generally applicable rights plus the right to object.
Notifications regarding our new products and services	Actively and Passively collection information	Legitimate interest. It is in our legitimate interest to market our new products and services to you. It is also in your interest as an App user as our new products and services may enhance your user experience.	The generally applicable rights plus the right to object.
To monitor compliance with our terms of use	Actively and Passively collection information	Contractual necessity.	The generally applicable rights plus the right to data portability.
Compliance with our legal obligations co-operation with relevant competent authorities	Actively and Passively collection information	Legal obligation.	The generally applicable rights only.

*The following generally applicable rights always apply: right to be informed, right of access, right to rectification, right to erasure, right to restriction and rights in relation to automated decision making. Please see the "Your rights in relation to your information" section above for more detail of your rights and how to exercise them.