

## VORTEX COMMUNICATIONS PRIVACY POLICY

Last Updated: May 23, 2018

VORTEX and GDPR

- We are committed to protecting and respecting your privacy and personal data
- We do not and will not sell or rent your information to third parties
- We do not and will not share your information with third parties of marketing purposes
- We do not hold any of your credit/debit card or bank information on our systems
- You have the right to ask us to “forget” you, in which case we will anonymise all data associated with you unless we are required to retain it for legal or statutory purposes.
- When you provide Personal Information to us, it is administered only by our full time staff.

### WHO WE ARE

Vortex Communications Ltd manufactures and supplies audio, video and other broadcast and related products to customers worldwide. At Vortex we respect the right to privacy and the protection of personal information. In this privacy policy references to "Vortex Communications Ltd", " we", "our" or "us" are to Vortex Communications Ltd.

### TO WHOM THIS POLICY APPLIES

This policy applies to visitors to our websites, customers, customers and users of our services, as well as individuals who have supplied us with details requesting information about future services (individually, “you”, “our customers”, “our customers”).

References to “our website” or “the Website” are to [www.vtx.co.uk](http://www.vtx.co.uk). By providing your data using the Contact section of our website, to the extent permitted by applicable law, you are consenting to us gathering and processing information about you in accordance with this Policy, although consent may not be required for all of the elements described in this Policy. For particular types of information or processing, we may provide you with choices or request your further consent related to what information we collect and how we may process it.

### INFORMATION COVERED BY THIS POLICY

This privacy policy explains how personal information is collected, used and disclosed by us. Our policy is to collect only the personal data necessary for agreed purposes and we ask our customers to only share personal data where it is strictly needed for those purposes. Where we need to process personal data to provide professional services, we ask our customers to provide the necessary information to the data subjects regarding its use. Our customers may use relevant sections of this privacy statement or refer data subjects to this privacy statement if they consider it appropriate to do so.

Generally, we collect personal data from our customers or from third parties acting on the instructions of the relevant customer.

### THIRD PARTIES

We may use Third parties to assist us in providing goods, services or information to you and to do this we may share information about you. For example, we work with re-sellers of our products in other countries where we are not able to operate directly and in these circumstances we will seek your permission to share your information with a reseller of our products. We may also share your information with a Third party supplier of additional goods or services in order for them to provide you with price quotations to complement a quote for services we have given you and in such cases we would disclose the identity of the Third party to you and ask your permission before sharing your data.

We may need to pass the information we collect to other companies for administrative purposes. For example, we may use third parties for such activities as processing or sorting data, monitoring how customers use the Website and issuing our e-mails for us. Third parties will not be allowed to use your personal information for their own purposes.

For information about Third party privacy practices, please consult them directly.

### BRIEF OVERVIEW

#### INFORMATION WE COLLECT

- Information you knowingly provide us with through forms, e-mail or telephone contact such as name, address, telephone number, e-mail address etc.
- Credit card or debit card details, bank account direct debit information.
- Your contact preferences and use of e-mail updates (if you select to receive e-mail updates on products and services).
- Your IP Address which is a string of numbers unique to your computer that is recorded by our web server when you request any page or component on the Website.
- Remote access details.
- Information regarding the services we provide you with to enable us to provide technical support services.

#### HOW WE USE YOUR INFORMATION

To provide quotes, process orders and provide after-sales goods and support services. To understand your needs and to improve the products, services and support that we offer. To allow us to provide technical support services such as fixing technical problems using remote access details.

To remind you of expiry dates of your subscription services with us.

We may use your information to contact you to discuss your interest in our products and services, to provide information on changes to our products and services, to respond to and fulfill your requests for contact, and to operate and market our services.

Financial information solely to process payments.

To comply with laws and regulations that apply to us.

#### HOW WE SHARE YOUR INFORMATION

Under certain circumstances, we act as the Data Processor of your information. We may pass your details to another organisation to supply/deliver products or services you have purchased and/or to provide after-sales service as consented by you or as permitted by applicable law. (See Third Parties above).

In order to effectively process credit or debit card transactions it may be necessary for the bank or card processing agency to verify your personal details for authorisation outside the European Economic Area (EEA). Such information will not be transferred out of the EEA for any other purpose.

#### SECURITY OF YOUR INFORMATION

We maintain commercially-reasonable technical, administrative and physical security measures designed to protect your information.

#### COOKIES AND OTHER TRACKING TECHNOLOGIES

We monitor the usage of our website and other products and services (with your informed consent). Please see our Software Information Collection Policy for more information.

Data recorded by the Website allows us to recognise you and your preferred settings, this saves you from re-entering information on return visits to the site. Such data is recorded locally on your computer through the use of cookies. Most browsers can be programmed to reject, or warn you before downloading cookies, information regarding this may be found in your browsers 'help' facility.

#### YOUR CHOICES

In certain cases we may use your email address to send you information about our other products and services. In such a case you will be offered the option to opt in/out of receiving further communications.

You can opt out of receiving Marketing Communications from us at any time. Please contact us by e-mail at [info@vtx.co.uk](mailto:info@vtx.co.uk) or via the Unsubscribe link on the Marketing Communication

#### ACCESS and CORRECTION OF YOUR INFORMATION

We contact you regularly to ensure there are opportunities to correct and update your information.

#### INTERNATIONAL TRANSFERS

We may transfer your information outside of your home country. To protect your information, any such international transfers will be made in accordance with applicable law.

#### LINKS TO OTHER WEBSITES

Our website may contain links to other websites or services that are not owned or controlled by us, including links to websites of our partners. We do not take responsibility for the Privacy practices of these services and for this information please contact them directly.

#### CHANGES TO THIS POLICY

You will be notified about any material changes to this Policy via a posting on our website and as otherwise required by applicable law.

#### CONTACT US

If you have questions about this Policy, please contact us.

## I. INFORMATION WE COLLECT

### PERSONAL INFORMATION

We may collect the following categories of personal information ("personal information") you provide to us: name; role/job title; email address; postal address; phone number (including your mobile phone number); fax number; billing information including bank details, credit card or debit card information; marketing responses; account notes; passwords; account reference numbers; remote access details; contact information of people you add to your account, and other information you may provide about yourself to enable us to provide quotes or services (e.g. size of site, number of users etc.).

We do not proactively collect personal information considered as sensitive personal information such as health-related information. However, our systems contain may include the capability to store text and notes to allow us to record relevant information about your specific requirements. You should be aware that information you freely submit and stored as these notes may reveal to us certain information that may be considered as sensitive personal information under applicable law.

### DEVICE INFORMATION

When you visit our Website, some information is automatically collected from devices including the mobile, computer, laptop or tablet used to visit or use our Site including, but not limited to, the operating system, access times, browser information including type, language and history, settings, and other data about your device that we use to provide the services or as otherwise described in this Policy ("device information"). We also collect information about your usage and activity on our Sites using certain technologies, such as cookies, web beacons and other technologies.

We might collect and store information relating to your remote access details; for example we may store a randomly generated identifier created by remote control software such as Windows Remote Access, or remote connection VPN details that you supply to us to allow us to remotely connect to your systems to help resolve support issues or carry out training.

### LOCATION INFORMATION

If you use our Site, we may receive your generic location such as your city or town

Personal information, device information, and location information are collectively referred to as "your information."

## II. HOW WE USE YOUR INFORMATION

We may use your information for the following purposes ("Purposes"), to: provide you with the services, products, and fulfill your requests, including, but not limited to, communicate with you about your account, services, products and/or functionality; respond to, or follow up on, your comments and questions, and otherwise provide customer service and technical support; communicate with you about special offers and other marketing communications; operate and improve our products, services, and functionality; authenticate your credit or debit card account information, if applicable; provide information, services and products to our customers, including price quotations for services or discuss existing quotations; remind you of expiry dates of your subscription services with us; protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; comply with our policies, procedures and legal obligations; and as otherwise consented to by you and as required or permitted by applicable law.

If you do not provide us with certain of your information, we may not be able to fulfil the requested Purpose of collection, such as to respond to your queries or provide our services or technical support to you.

### ELECTRONIC COMMUNICATIONS

Under the GDPR we use the consent lawful basis for anyone subscribing to a newsletter or marketing mailing list. We only collect certain data about you as detailed in the "Information we collect" above. Consistent with the above Purposes, we may communicate with you via electronic messages, including email, or text message to send you information relating to our products and services, or to remind you of expiry dates of your subscription services with us as examples. Some email marketing messages we send are done so through an E-Mail Marketing Service Provider (EMS), which is a Third party service provider of software / applications that allows marketers to send out email marketing campaigns to a list of users.

Email marketing messages that we send may contain tracking beacons / tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, IP addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences / the information we hold about you at any time. See any marketing messages for instructions on how to unsubscribe or manage your preferences, you can also unsubscribe by contacting the EMS provider.

If you leave your details via our Website Contact page, you have the option to say that you do not want to receive marketing and promotional e-mails from us. You are also able to contact us at any time to request that you do not receive any marketing and promotional e-mails from us and your preferences will be recorded.

#### TELEPHONE COMMUNICATIONS

With your consent, where required, we may contact you using the phone numbers that you provide to us by way of direct dial calls or less-likely, auto-dialed and pre-recorded message calls and text messages in connection with the above Purposes.

#### OUR ROLE AS DATA CONTROLLER AND DATA PROCESSOR

We generally act as the data controller of your information; however, under certain circumstances, as described above in "Third parties", we may share your information with other companies with your consent.

Retention. We will retain your information for the period necessary to fulfill the Purposes outlined in this Policy and as otherwise needed to comply with applicable law and internal company policies.

#### III. SECURITY OF YOUR INFORMATION

Vortex Communications Ltd takes commercially-reasonable technical, administrative, and physical security measures designed to protect your information from loss, misuse, unauthorised access, disclosure, alteration, and destruction.

Confidential paper records will be kept in a locked filing cabinet, with restricted access to relevant personnel. Digital data is coded, encrypted and password-protected, both on a local hard drive and on a network drive that is regularly backed up off-site. All electronic devices used by staff are password-protected to protect the information on the device in case of theft. All members of staff are provided with their own secure login and password.

When sending confidential information by fax, staff will always check that the recipient is correct before sending.

Where personal information that could be considered private or confidential is taken off site either in electronic or paper format, staff will take extra care to follow safety procedures.

#### IV. ACCESS AND CORRECTION OF YOUR INFORMATION

Once we have your details on file we will contact you regularly to ensure that the details we have for you are up to date. If you have a customer account with us and would like to update the information you have provided to us, you can contact us at any time to make changes or corrections to your information at [info@vtx.co.uk](mailto:info@vtx.co.uk)

#### V. INTERNATIONAL TRANSFERS

Information about you may be transferred to, or accessed by, entities located around the world as described in this Policy. Some of these entities may be located in countries that do not provide an equivalent level of protection as your home country.

#### VI. LINKS TO OTHER WEBSITES

Our Website may contain links to other websites or services that are not owned or controlled by us. This Policy only applies to information collected by us. We have no control over Third party websites, and your use of Third party websites and features are subject to privacy policies posted on those websites. We are not responsible or liable for the privacy or business practices of any Third party websites linked to our Website.

#### VII. CHANGES TO THIS POLICY

Except to the extent limited by applicable law, we reserve the right to update this Policy to reflect changes to our information practices by prominently posting notice of the update on our Website, and as required, obtaining your consent. Any updates will become effective immediately after posting the updates to this Policy and apply to all information collected about you, or where required, upon your consent. You agree that you will review this Policy periodically. If we make any changes to this Policy, we will change the "Last Updated" date above. You are free to decide whether or not to accept a modified version of this Policy, but accepting this Policy, as modified, is required for you to continue using our services. If you do not agree to the terms of this Policy or any modified version of this Policy, your sole recourse is to terminate your use of our services.

If we make any changes to this Policy that materially impacts previously collected information about you, we will obtain your prior express consent.

If you have any questions about this Policy or information we have collected about you, please contact us by email at [info@vtx.co.uk](mailto:info@vtx.co.uk)