

Metro Communications Privacy Policy

1. INTRODUCTION

This Privacy Statement applies to the processing by Metro Communications of your personal data. Metro Communications takes your privacy very seriously and treats all your personal data with great care. Metro Communications acts in accordance with the applicable data protection legislation.

When you visit our websites (or subdomains) (the “website”), contact us, purchase products from us or visit one of our offices, we collect information from and about you. Some of the information we collect may be classed as personal data under data protection legislation, that is, “any information relating to an identified or identifiable natural person”. It may be collected any time you submit it to us, whatever the reason may be.

This Privacy Statement describes which personal data is collected and for which purposes this personal data is processed by Metro Communications. It also states which rights you have under applicable data protection legislation.

WHO WE ARE: For the purpose of applicable data protection legislation, the data controller of your personal data is Metro Communications Ltd, a limited company registered in England and Wales.

MUST READ SECTIONS: We draw your attention in particular to the sections entitled “International Data Transfers” and “Your Rights.”

2. COLLECTING YOUR PERSONAL DATA

Metro Communications collects information about you in the following ways.

Information you give to us. This includes personal data collected:

- Through our Website when you register, commence or complete an online transaction to use our products and services.
- When you contact our team or use the facilities at any of our offices. Facilities include, but are not limited to, meeting rooms, office space and access to our networks or Wi-Fi.
- When you have provided your consent, in order to sign up to any event or meeting, subscribe to any of our marketing communications, complete customer surveys, enter competitions or provide feedback.

When we do business with you, which will usually include:

- Full or partial contact details including names and addresses (including business details if you are placing an order), telephone and email details.
- Car parking arrangements at our properties may also make it necessary for us to collect your car registration number for your visit to us.

Information collected automatically. This includes information and personal data collected:

- Through our Website(s). We automatically log information about you and your computer or mobile device when you access our Website, either directly or as a result of email communication from us. If your personal details are not already held on our systems, this data is stored anonymously, until such time that consent is obtained for us to process it. The information about your use of the Website comprises http header information, which your browser transmits to our webserver, information collected through the use of cookies and log information. As an example, we log your computer or mobile device operating system name and version, manufacturer and model, browser type, browser language, screen resolution, pages you viewed, access times and information about your use of and actions on our website(s).

3. WHY DO WE PROCESS YOUR PERSONAL DATA?

Your personal data will be stored in

- (i) centralised systems, which are under the control of Metro Communications, and accessible by authorised staff of company or our suppliers, and
- (ii) select local systems controlled solely by the relevant local office(s).

We use the information we collect about you to process orders, answer your queries, process and fulfil contracts to provide our services, enable you to access our website and provide support. With your consent, we will contact you via our marketing and sales channels (email / phone / post) about other related products and services we, or our suppliers offer, provided we think may be of interest to you. Our marketing communications are generally sent by email but we may sometimes use other methods of delivery such as by telephone or post.

We mainly collect, store and process personal data at two different stages:

- (i) before you decide to buy as a prospective customer and
- (ii) after you order from us, in order to fulfil or provides services.

Before you decide to buy as a prospective customer

When you visit our websites (www.metrocomms.co.uk), we collect information about your use of the website. This includes information we source from a 3rd party database provider, information we collect directly from you, and information we collect about your behaviour. This information may constitute 'personal data' under applicable law. We use this information to provide your business with information, both on our Website and via advertisements on other websites you visit.

We often act as an authorised reseller for technology companies with a distributor between us and them. In order to get technical and commercial support from distributors and vendors we are often obliged to provide details to them. Ordinarily the data they request is your company, your name, your job title, your email address, phone number and details of the solution we are discussing with you. Whilst those distributors have their own Privacy Policies and Privacy Agreements we make it clear to them that we provide those details in strictest confidence and that they remain confidential between us and are not to be shared with anyone.

Third-Party Advertising

We may use other companies to serve third-party advertisements when you visit and use our websites. These companies may collect and use click stream information, browser type, time and date, subject of advertisements clicked or scrolled over during your visits to the Website and other websites in order to provide advertisements about goods and services likely to be of interest to you. These companies typically use tracking technologies to collect this information. Other companies' use of their tracking technologies is subject to their own privacy policies.

Targeted Marketing

We use Website information to provide your company with offers, both on our Website, through marketing communication and via advertisements on other websites you visit. We do not provide personal data to advertisers when you interact with an advertisement.

After you order from us, in order to fulfil our contract

When you request a quotation or order, you will have to provide us with your name, email address, phone number and any other information required to process your request. We use this personal data to process the request, for billing purposes, and to allow us to communicate with you about your enquiry. When you visit one of our offices, we may collect personal data about your preferences, use of our services, and location.

We may at each of the stages outlined above use your personal data but only when and to the extent the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal or regulatory obligation.
- Where you have provided your consent.

For your convenience, the following overview of activities, that involve the processing of your personal data, are shown below, with the corresponding legal basis/legal bases that allow us to process this data.

| Purpose/activity | Legal basis |
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| We store the personal data you provide to us in our systems for administrative purposes. | <ul style="list-style-type: none"> • consent, where required • enter into or perform a contract to which you are a party |
| Government regulations require us to ask you to provide us with certain information when you arrive at a Metro Communications office. This may | <ul style="list-style-type: none"> • compliance with a legal obligation |

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| include information such as: name, email address, Meeting date and profession. | |
| We store your personal data in our database(s), also after a order transaction has been completed to the extent required by law, and if you have not withdrawn your consent, to be able to contact you and again in the future. | <ul style="list-style-type: none"> • compliance with a legal obligation • for the purposes of our legitimate interests, including: <ul style="list-style-type: none"> • keeping our records up to date • managing our on-going relationship with you |
| For many of our business purposes we use cloud based services. Therefore, for technical and organisational reasons, it is necessary that your personal data is transferred to servers located in the US, or to servers located in countries outside of the European Economic Area ('EEA'). | <ul style="list-style-type: none"> • enter into or perform a contract to which you are a party • for the purposes of our, or a third party's, legitimate interests, including: <ul style="list-style-type: none"> • the provision of services, marketing, administration and IT services and network security • preventing fraud |
| We process your enquiry, proposal, order or service request. | <ul style="list-style-type: none"> • enter into or perform a contract to which you are a party |
| We offer and provide services and products you request from us, or which we may think you are interested in, via email, telephone or other media. These marketing communications contain commercial offers and news of Metro Communications and related third parties. We use the email address sourced by a 3rd party, or provided by you, to send the communication to. If you no longer wish to receive these, you can unsubscribe and we will no longer send you these marketing communications. | <ul style="list-style-type: none"> • consent, where required • enter into or perform a contract to which you are a party • for the purposes of our, or a third party's, legitimate interests |
| We use commercial payment contact data for invoicing purposes. | <ul style="list-style-type: none"> • enter into or perform a contract to which you are a party |
| If you would like to park in one of our office parking areas we may collect your license plate number for security purposes. | <ul style="list-style-type: none"> • enter into or perform a contract to which you are a party |
| We collect data on your use of our network and Wi-Fi services for security and anti-piracy purposes (such as: IP address, your device's MAC address, connections made, location, etc.). We do not process the content of traffic. | <ul style="list-style-type: none"> • consent, where required • for the purposes of our, or a third party's, legitimate interests, including maintaining appropriate IT and network security |
| We endeavour to provide a high level of security of both the information we store as well as our facilities, (IT) systems and premises, by means of encryption, | <ul style="list-style-type: none"> • for the purposes of our, or a third party's, legitimate interests, including maintaining appropriate physical and IT/network security |

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| <p>physical security measures, passwords, company procedures and policies and professional IT support. Personal data may be processed in this context by Metro Communications and its vendors.</p> | |
| <p>We endeavour to prevent our services and facilities (properties) from being used for illegal purposes, of any kind. Personal data may be processed in this context by the company and its providers, such as through CCTV surveillance.</p> | <ul style="list-style-type: none"> • vital interests • for the purposes of our, or a third party's, legitimate interests, including protecting you during your visit |
| <p>We engage in activities required for compliance with legal obligations, third party claims or requests from public authorities, such as (i) the mandatory storage/containment of certain information because of a criminal investigation, (ii) requests from third parties for access to information (iii) any further instructions from third parties, such as supervisory authorities, that involve data processing.</p> | <ul style="list-style-type: none"> • consent (if required) • enter into or perform a contract to which you are a party • for the purposes of our, or a third party's, legitimate interests or compliance with a legal obligation |

4. SHARING YOUR DATA

We may share your personal data as follows:

- **Third Parties designated by you.** We may share your personal data with third parties where you have provided your consent to do so.
- **Our Third Party Service Providers.** We may share your personal data with our third party service providers who provide services such as payment processing, information technology and related infrastructure provision, business support (operational and administrative), customer service, the processing and delivery of marketing communications to you, email delivery, auditing and other similar services. These third parties are only permitted to use your personal data to the extent necessary to enable them to provide their services to us. They are required to follow our express instructions and to comply with appropriate security measures to protect your personal data. Third parties are subject to confidentiality obligations and may only use your personal data to perform the necessary functions and not for other purposes.
- **Manufacturer Partners.** We may share some or all of your personal data with our Manufacturer partners. In which case we will require our partners to comply with this Privacy Statement. In particular, you may let us share personal data with our partners where you wish to receive marketing communications from them.
- **Corporate Restructuring.** We may share personal data when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of

our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.

- **Other Disclosures.** We may share personal data as we believe necessary or appropriate: (a) to comply with applicable laws; (b) to comply with lawful requests and legal process, including to respond to requests from public and government authorities to meet national security or law enforcement requirements; (c) to enforce our Privacy Statement; and (d) to protect our rights, privacy, safety or property, and/or that of you or others.

We do not share your data with any third parties outside of the above processing arrangements and we do not share your data with any business external to our group for their own marketing purposes. From the data we collect, you should only ever receive marketing communications from our own brands.

5. INTERNATIONAL DATA TRANSFERS

In some instances it is necessary to transfer your personal data overseas. Any transfers will be made in full compliance with all aspects of the applicable regulations. For many of our business purposes we use cloud-based services. Therefore, for technical and organizational reasons, it is necessary that your personal data is transferred to servers located in Canada, or to servers located in countries outside of the EEA. When we transfer the data to a country outside of the EEA that does not offer an adequate level of data protection, we will ensure compliance with applicable law by way of EU Model Clauses, EU-US Privacy Shield-certification, or other legally accepted safeguards, as applicable.

6. YOUR RIGHTS

The GDPR provides the following rights for individuals:

Right to revoke consent: If we process personal data on the basis of your consent, you have the legal right to revoke such consent at any time. We will then cease the relevant processing activity going forward.

Right of access to your information: If you want to know what personal data we have collected or process about you, you may request us to provide a copy of your personal data by sending an email to compliance@metrocomms.co.uk. We will ask you to identify yourself. We will not provide you with a copy of your personal data to the extent that the rights and freedoms of others are or may be adversely affected.

Right to rectification and erasure of data, and restriction of processing: If you believe that our processing of your personal data is incorrect, inaccurate, unlawful, excessive, incomplete, no longer relevant, or if you think that your data is stored longer than necessary, you may ask us to change or remove such personal data or restrict such processing activity, by sending an email to compliance@metrocomms.co.uk.

Right to data portability: You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format, in accordance with Article 20 of the General Data Protection Regulation.

Right to object: You have the legal right to object, on grounds relating to your particular personal situation, at any time to processing of your personal data. Furthermore, you have the right to object at any time to our processing of your personal data for direct marketing purposes or to profiling. You can do this by either

- (i) opting out by using the option we provide in the relevant direct marketing message (e.g. an email newsletter), or
- (ii) updating your preferences on your profile on the www.metrocomms.co.uk website, or
- (iii) by sending an email to compliance@metrocomms.co.uk or
- (iv) writing to:

Customer Service Team

Metro Communications

Kemp House

160 City Road

London

EC1V 2NX

ENGLAND

General information relevant for all requests and queries

Nothing in this Privacy Statement is intended to provide you with rights beyond or in addition to your rights as a data subject under applicable mandatory data protection law. We will use reasonable endeavours to respond to your request or query within one month. We are entitled to extend this term by another two months if the complexity of the situation so requires. If your request is manifestly unfounded or excessive we may either

- (i) charge you a fee, or
- (ii) refuse to process your request. With respect to access requests we may also charge you for extra copies. If we decide not to honour your request or answer your query, we will explain our reasons for doing so in our reply.

7. PROTECTION AND STORAGE OF YOUR DATA

We have used and will continue to use reasonable endeavours to protect your personal data against loss, alteration or any form of unlawful use. Where possible, your personal data will be encrypted and stored on a virtual private server that is secured. A strictly limited amount of people has access to your personal data. 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.

8. COOKIES

The Website uses various cookies. We may track and record your use of our online services, either through cookies or via other means. Cookies enable us and others to monitor your browsing behaviour. Information generated by the use of cookies may constitute personal data. We may use the personal data collected in this manner for the purposes as stipulated in this Privacy Statement. If you want to know more about our use of cookies, read our Cookie policy.

9. RETENTION OF INFORMATION

We will only retain your personal data for the period necessary to fulfil the purposes outlined in this Privacy Statement. This may be up to 4 years, unless a longer retention period is required or permitted by law (which is typically the case in the context of our obligations under tax law). Should you choose to unsubscribe from our mailing list, please note that your personal data may still be retained on our database to the extent permitted by law.

10. WEBSITES

For a full list of our websites please visit <https://www.metrocomms.co.uk/websites/>

11. GENERAL

We are committed to resolve any complaints about our collection or use of your personal data. In case you have any questions in relation to this Privacy Statement or our practices in relation to your personal data you may send an email to compliance@metrocomms.co.uk. We hope to resolve any complaint brought to our attention, however if you feel that your complaint has not been adequately resolved, you reserve the right to contact your local data protection supervisory authority, which for the UK, is the Information Commissioner's Office.

We have done our best to make sure that this Privacy Statement explains the way in which we process your personal data, and rights you have in relation thereto. We may change this Privacy Statement from time to time to make sure it is still up to date and we will notify you if we make any material updates. We may also notify you in other ways from time to time about the processing of your personal information.

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