

BACKGROUND:

Growthfast understands that your privacy is important to you and that you care about how your personal data is used and shared online. We do not collect personal data about you unless you contact us (see section 5, below). Any personal data We do collect will only be used as permitted by law. We are committed to protecting and respecting your Privacy whilst remaining compliant with the General Data Protection Regulation (EU GDPR) and the Data Protection Act (DPA).

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

This website is not intended for children and we do not knowingly collect data relating to children. By visiting <https://connex.ai/> you are accepting and consenting to the practices described in this policy.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”) We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows: identity data includes first name and last name contact data includes home address, email address and telephone number profile data includes your username and password technical data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Site
“We/Us/Our”	means Growthfast, a limited company registered in England under company number 15932559 whose registered office is at 71-75, Shelton Street, Covent Garden, London, WC2H 9JQ
“Our Site”	https://growthfast.io/ and any other website we use to provide the Services.
“Our Services”	Those omnichannel communication and customer management solutions as made available by us from time to time’.

2. Information About Us

Our Site is owned and operated by Growthfast a limited company registered in England under company number **15932559** whose registered office is at 71-75, Shelton Street, Covent Garden, London, WC2H 9JQ

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them. 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.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit

4. Your Rights

- 4.1. As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:
 - 4.1.1. The right to be informed about Our collection and use of personal data;
 - 4.1.2. The right of access to the personal data we hold about you (see section 8);
 - 4.1.3. The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 9);
 - 4.1.4. The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 9);
 - 4.1.5. The right to restrict (i.e. prevent) the processing of your personal data;
 - 4.1.6. The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
 - 4.1.7. The right to object to Us using your personal data for particular purposes; and
 - 4.1.8. Rights with respect to automated decision-making and profiling.
- 4.2. If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in section 9 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office (www.ico.org.uk).
- 4.3. For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

5. What Data Do We Collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

- 5.1. Direct Interactions; If you send Us an email, we may collect your name, your email address, and any other information which you choose to give Us.
- 5.2. We may also collect your name, email address, telephone number and any other information which you choose to give Us when you contact us via the contact form or Live Chat on our Site.
- 5.3. Cookies are used to collect information about how you interact with our website and allow us to remember you. We use this information in order to improve and customise your

browsing experience and for analytics and metrics about our visitors both on this website and other media. Please see our cookie policy on our website for further details about the cookies we use, your rights, and their purposes.

6. How Do We Use Your Data?

- 6.1. If you contact Us via our Site or via email and We obtain your personal details, we will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:
- 6.2. To reply to your email;
- 6.3. To make contact over a telephone;
- 6.4. to register you as a new customer (if you wish to become a customer)
- 6.5. Where we need to perform the contract we are about to enter into or have entered into with you.
- 6.6. 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.
- 6.7. Where we need to comply with a legal obligation.
- 6.8. To contact you regarding a job application submission via the Careers page.

If you wish to become a customer, we will store your personal data on Our accounting and operation service software to facilitate the engagement (performance of a contract).

If you do not wish to become a customer but you “opt-in” to receive directing marketing from Us in relation to Our services, new features, pricing or products, we will process your personal data based on your legitimate interest to do so.

1. Any personal data we do collect from you will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under GDPR at all times. For more details on security see section 7, below.
2. Any and all emails containing your personal data will be deleted no later than 12 months after submission
3. You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can contact Us at denis.k@growthfast.io to make any changes on your marketing choices.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. Recipients of Personal Data

- 7.1. Growthfast may be required to transfer the personal information provided by you to third parties in order to fulfil its contractual obligations. The following are categories of recipients that customer information could be transferred to; Data centres – to ensure your data is stored securely, Helpdesk software – to allow us to manage customer contact
- 7.2. We cannot guarantee the secure transmission of your data through the internet which is submitted through our website; any transmission is done so at your own risk. Once we have received your information, we will use strict procedures and security features to protect your information.
- 7.3. We may share your personal data with the parties set out below for the purposes set out in the table:

Company Name	Purpose	Company contact details
M3ST	Telecoms	M3ST Ltd, 105 Great North Road, St Neots, Cambridgeshire, PE19 8EL
AQL	Telecoms	Salem Chapel, 11-15 Hunslet Road, Leeds LS10 1JQ
Nexbridge	Telecoms	Carpenter Court, Maple Road, Bramhall, Cheshire SK7 2DH
UKfast	Data centre	UKFast Campus, Birley Fields, Manchester, England, M15 5QJ
ZenDesk	Customer support ticket system	1019 Market St San Francisco, CA 94103 888-670-4887
Salesforce	Customer Relationship Management	Salesforce Tower 415 Mission Street, 3rd Floor San Francisco, CA 94105

Amazon Web Services EMEA SARL	AWS will store data as a Cloud Service Provider	38 Avenue John F. Kennedy, 1855, Luxembourg
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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.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring the following safeguard is implemented;

- Where we use providers based in the US, we may transfer data to them if they are part of the EU-US Data Privacy which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Data Privacy Framework.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. How and Where Do We Store Your Data?

- 8.1. We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 8.2. Your data will only be stored within the European Economic Area ("the EEA") Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure any data We hold about you (even if it is only your email address).
- 8.3. Steps We take to secure and protect your data include:
 1. Information Security policies
 2. Data Protection Policies
 3. Encryption
 4. Physical and Cloud Security
 5. ISO27001:2013 Certified
 6. ISO22301:2019 Certified
 7. ISO9001:2015 Certified

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

9. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with the best experience when you browse our website and helps us to make improvements to our website. For detailed information of the cookies we use and the purposes for which we use them see our Cookie Policy https://growthfast.io/docs/Cookies_Policy.pdf

10. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may 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 several requests. In this case, we will notify you and keep you updated.

Please contact Us for more details at info@growthfast.io

11. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at info@growthfast.io. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 8, above).

12. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.