



MONTANASGROUP

INCORPORATING

NETWORK
WAREHOUSE

 **TITAN**

PRIVACY POLICY

We are Montanas Group Limited (Company No. 12355234) and our address is 1 Billing Road, Northampton NN1 5AL, UK (“we” or “us” or “our”)

We are providers of the website
www.montanagroup.com (**“Site”**) and provide
Configuration & Subscription Services
(**“Services”** or **“Service Data”**).

Our VAT number is 338 9283 60

We respect your privacy and understand your
confidentiality is important to you and how your
Personally Identifiable Information (**“Personal Data”**) is
administered. This is why we have taken the time to
disclose our data collection practices and our Privacy
Policy (**“Policy”**). Please take the time to review this
Policy and ensure that you understand it. By using,
accessing our Sites and/or Services, you accept and
agree to the practices described in our Policy, on behalf
of yourself and all persons and businesses you
represent.

A reference to **“you”** or **“your”** is a reference to a user of
any of our Sites or Services.

How to Contact Us

Should you have questions or comments relating to
this Privacy Policy, please email our privacy team at
privacy@montanagroup.com

What Does This Policy Cover?

This Policy applies only to your use of our Sites &
Services that we provide. Our Sites may link to other
third-party websites or services that we don't control
which aren't covered by our Policy. We advise you to
check the privacy policies of any such sites and services
before providing any data.

Data We Collect

1. User-provided Data

When using our Sites or Services, you may provide
certain Personal Data by which someone could
personally identify you, such as:

- Name
- Company Name
- E-mail Address
- Demographic Information
- Billing and Shipping Addresses
- Telephone Number(s)
- Purchase History and Site preferences
- Payment Data (when making an online
purchase through our Sites)
- Other Contact Information

2. Passive-provided Data

As well as information you provide, we may collect
through our Sites or Services, (through cookies, web
beacons, and web server logs) the IP address of the
device you use to connect to the Internet, domain
name, unique device identifier, browser characteristics,
device characteristics, operating system, language
preferences, referring URLs, information on actions
taken on the Sites, dates and times of site visits and the
pages accessed).

3. Service Data

We may automatically collect information from your products, third party mobile apps that use our Services, and web browser when you use our Sites. The Service Data that we collect may include information such as your device data, (mobile or otherwise), sensor data, device signals, device parameters, device identifiers that may uniquely identify your devices, including your mobile device, web request, Internet Protocol address, browser type, browser language, referring/exit pages and URLs, platform type, the date and time of your request, and one or more cookies that may uniquely identify your devices or browser. In Addition, we may automatically collect location information (including latitude and longitude), performance data, motion data, temperature data, power usage data, and any data or signals collected by the devices as part of the Service Data.

4. Support Data

We may collect certain support data when you submit a support request, including information about your hardware, software and other information related to your support requirements. We will use this support data to resolve your support incident and for training and product development purposes.

5. We do not collect the contents of any communications that pass through your devices or our Services.

Uses of Your Personal Data

1. We use your Personal Data in different ways, as required by applicable law.

2 Personal Data is used in the performance of our contract, including:

- **Order Processing**

To fulfil orders or services, process payments, arrange shipments, and facilitate deliveries.

- **Administration**

To identify the orders, products and services associated with you.

- **Returns**

To efficiently handle any return requests.

- **Terms of Service**

To monitor and enforce our general “Terms of Service” or “Terms and Conditions” or any applicable terms related to specific services.

3. Personal Data is used in the legitimate interests of our business, including:

- **Analytical Activities**

For a seamless customer experience, we may use your Personal Data to help innovate and research our Sites and Services.

- **Other Business Uses**

For normal business operations such as credit checks, if you apply for a credit account, and to verify your identity.

- **Legal**

In the establishment, exercise or defence of legal claims or allegations, and to take precautions against liability.

- **Security**

To protect the security or integrity of our Services, and to protect the rights, property, or personal safety of us, our employees, our users, or others.

4. Personal Data may be used with your consent in marketing to you through bespoke offers and newsletters.

5. Personal Data may be used or retained to fulfil our legal obligations, including tax law and assisting government agencies in their lawful duties.

Sharing Your Personal Data

We do not sell or otherwise disclose your Personal Data, except as described here. We may share Personal Data:

1. Internally within Montanas Group Ltd.
2. With third parties for the purposes of operating our business, delivering, improving, and customising our Sites and Services.
3. With third parties who help us provide services for us. Examples include fulfilment of orders and payment transactions, marketing e-mails, gathering statistics and customer support.
4. With government authorities, law enforcement or other third parties that are required by law, regulation or legal process.
5. If we otherwise notify you and you give us consent to share your Personal Data.

How We May Disclose Data

We may disclose the data we collect related to our Sites and Services, and by use of our Sites and Services, you expressly consent to such disclosure.

1. Service Data

We may provide Service Data to our customers in connection with the Services which those customers use. For example, our customers may include network providers or operators and we may disclose Service Data to these customers in connection with the products and devices that are deployed over these

customers' networks. The treatment of Service Data by these third-parties is subject to their own privacy policies, and not this one. We are not responsible for the content or privacy and security practices and policies of those third parties.

2. Aggregate or De-identified Data

We may share Non-Personally Identifiable Information, including Service Data (such as anonymous or aggregate user usage data, referring/exit pages and URLs, platform types, etc.), with certain third-parties to assist them in understanding the usage patterns for certain content, services and/or functionality with respect to our Services. We may also share aggregate or de-identified information about users with third-parties for marketing, research, or similar purposes.

3. Service Providers

We may disclose certain User Information to third party partners, service providers, contractors or agents who perform functions on our behalf (e.g., with partners that help us with delivering Goods to you, partners that help us maintain our Sites, or analytics providers).

4. Other Disclosures

We may also disclose your Personal Data if required to do so by law, or in the good-faith belief that such action is in response to a request for information by a competent authority, if we believe disclosure is in accordance with, or is otherwise required by, any applicable law, regulation or legal process.

Where and How Long We Store your Personal Data

Your Personal Data we collect is stored within the European Economic Area ("EEA") and by submitting your Personal Data to us, you agree to this storing or processing. We retain your Personal Data for as long as we need to fulfil the purposes for which it was collected, legal obligations or for as long as we have your consent to use it.

We do not retain credit card or payment card details beyond the individual transaction for which it was provided.

How We Protect your Personal Data

Data Protection is very important to us and we take reasonable commercial measures to secure your Personal Data from loss, misuse, unauthorised access & amendments. Please be aware, security on the Internet cannot not be guaranteed 100% secure and while our security practices are the best we can offer, we cannot guarantee absolute security to your personal information.

Children's Privacy

Our websites and services are not intended for children under the age of 13 and we do not knowingly collect personal information from those children without appropriate parental or guardian consent. If you are a parent or guardian and discover that your child under the age of 13 years of age has provided Personal Data to us, then you may contact us at privacy@montanagroup.com to request to delete your child's Personal Data from our systems.

Your rights

You are entitled to request the following Data Subject Rights from us, and more information can be found on these on the Information Commissioners website www.ico.org.uk.

1. Right of access –to request access to your Personal Data and information about how we process it.
2. Right to rectification –to have your Personal Data corrected if it is inaccurate and to have incomplete Personal Data completed.
3. Right to be forgotten – to have your Personal Data erased.

4. Right to restriction of processing – to restrict processing of your Personal Data.

5. Right to data portability - to electronically move, copy or transfer your Personal Data in a standard form.

6. Right to object - to object to the processing of your Personal Data.

7. Rights with regards to automated individual decision making, including profiling –rights relating to automated decision making, including profiling. If you have any general questions about your rights or want to exercise your rights please contact privacy@montanagroup.com.

You have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country where you work or live, or where your legal rights have been infringed. The contact details for the Information Commissioner's Office (ICO), (the data protection regulator in the UK), are available on the ICO website www.ico.org.uk. Where your Personal Data has or is being used in a way that you believe does not comply with GDPR, however, we encourage you to contact us before making any complaint and we will seek to resolve any issues or concerns.

Changes to This Policy

Any changes we may make to this Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to this Policy. Policy last updated: 23rd May 2018.