



PRIVACY POLICY

This is the Privacy Policy for Picotegroup.com, Picotesolutions.com, Picoteinstitute.com, Picoteplumbing.com and Picotebrushcoating.com

How your personal information is used and how you can exercise your rights with respect to your personal data.

In the course of our contact and dealings with you we will collect and process a limited amount of personal data in order to provide you with the goods and services you request and to administer our relationship with you. This may involve storing your information, sharing it within our company or network of resellers, and the transfer of your personal information overseas. This Privacy Policy describes this in detail and explains how we will use your personal information and how you can exercise your rights in relation to it.

Definitions:

- When we say “we” “us and “our” and “Picote”, we are referring to **Picote Solutions UK Ltd** 30a Rose Street, Wokingham, Berkshire, RG40 1XU in the UK; **Picote Solutions Oy Ltd** Company Number FI09358308 Pienteollisuustie 24, 06450 Porvoo, Finland; and **Picote Solutions Inc.** 20810 SE 18th Place Sammamish, WA 98075, USA. EIN is 471248040.

We provide trenchless tool solutions for the global market through innovation, training and experience in collaboration with each other.

- When we refer to “**you**”, “**your**” or “**the user**” we are referring to any individual who has visited our websites:
- <https://www.picotegroup.com/>
<http://www.picotesolutions.com/>
<https://www.picotebrushcoating.com/>
<https://www.picoteplumbing.com/>
<https://www.picoteinstitute.com/learn> or had any contact with our company through social media, email, telephone, face-to-face contact at events or otherwise, website enquires, or from contact through our reseller network.
- When we refer to “the Picote Institute” or just “the Institute” we are referring to the online learning platform which can be found at: <https://www.picoteinstitute.com/learn>
- When we refer to “**resellers and distributors**” we are referring any of our reseller network of companies who sell our products to contractors, other resellers, or other end customers. The latest list of these companies can be found on the reseller page of the website <https://www.picotegroup.com/resellers>
- “**Personal information**” is any information that identifies or can be used to identify you, directly or indirectly, including but not limited to; first and last name, email address, telephone number(s), geographic location, username, employer and job title.

Changes:

We may change this Privacy Policy at any time and from time to time. The most recent version of this policy is reflected by the version date located at the bottom of this Privacy Policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, by posting a revised version of this Privacy Policy or other notice on the website. We encourage you to review this Privacy Policy regularly to stay informed of any changes that might affect you.

Scope:

This Privacy Policy is effective with respect to any data that we have collected or collect about and/or from you.

The personal data we collect.

We collect:

- first and last names, or initials
- email address
- telephone number(s)
- geographic locations
- feedback
- warranty claims/complaints
- competition entries
- comments
- photographs at our events
- photographs from public or industry events
- employer/business names and addresses
- business category
- job titles
- social media account names

In addition, specifically for users of the Institute:

- account creation date
- last access date
- username/screenname and passwords
- user profile photo if provided
- language preferences
- time zone of user
- usage statistics, including but not limited to, user level, time spent in courses, progress within course and prior activity
- previous purchase information
- points and/or badges awarded accrued through participation in the Institute and those yet to be awarded.
- Q&A content posted by the user, including but not limited to questions posted and answers given, total number of posts, opened discussions, average post rating, asset views/shared assets – graph by month for last 12 months, upcoming webinars/past webinars, asset ranks,

top 3 most watch assets (weekly), certifications/retraining, top 3 most viewed courses in total time, statistic (in points): highest test score, lowest test score, average test score. User top 1 most recent results (learning objects)

- any other posted information provided by the user
- cookies, for more information please see <https://www.docebo.com/cookie-policy/>

In addition, specifically for users of the www.picotegroup.com on submission of a contact form:

- cookies, for more information please see <https://legal.hubspot.com/cookie-policy> and <https://legal.hubspot.com/privacy-policy>

How we use your data and legal basis for doing so.

Any information collected will be used for the purpose of fulfilling orders, answering queries, informing you of new products and promotions, warranties and servicing, informing you of any changes to the Institute (content additions, changes, deletions), communicating with relevant resellers, maintaining and improving our service to you and any communication pertaining to our business dealing with you.

By agreeing to use the Institute, or by consenting to Marketing permissions on contact forms at www.picotegroup.com, your email address will be added to our newsletter mailing lists unless you opt-out on the form. You may also opt-out of marketing emails at any time using the unsubscribe links in emails. To remove marketing permissions please contact us at privacy@picotesolutions.com

Geographical data, for example, allows us to direct you to the nearest reseller.

Feedback and comments will be used to improve our services and products.

Forum questions will be used to improve our communication and technical information sharing and might also lead to added online content. The intellectual property rights of this remain with Picote.

Competition entry data will be used for the purpose of the competition unless the opt-in consent is given and then that data will be used as agreed at the time of consent.

If the law requires us to process your data we will do so. This can include legal, compliance, regulatory and investigative processes, including for government agencies and law enforcement.

How we collect data.

The data we collect is gathered by direct email/telephone/face to face contact; via forms on our websites (please see above); forms at trade events; service request forms; enquiries through social media and sign-ups to the Institute.

We use publicly available sources such as social media (including, but not limited to, Facebook, Twitter, Instagram, YouTube, Tiktok and LinkedIn etc) and the internet to find new company contacts for targeted marketing. We are active with multiple accounts across each platform including company linked and employee's personal accounts.

For more information about our use of cookies please find the cookies policy on our [website](http://www.picotegroup.com) <https://www.picotegroup.com/>

Data is also gathered when a user signs up to the Institute. This data is gathered on sign-up and from all aspects of the learning platform.

Revised: July 2022

Data sharing

Data is shared within Picote Solutions UK and Picote Solutions Oy Finland and Picote Solutions Inc. (USA) and their respective resellers. It is shared only when necessary outside of Picote with relevant resellers for the purpose of customer service, training and sales.

We may share your data with third parties but only for the reasons outlined above. Third parties might include shipping companies, insurance and logistics companies if you are taking delivery of an order, and approved resellers and/or distributors where appropriate.

Personal data may be shared with government authorities and/or law enforcement officials for the prevention and detection of crime, if required by law or if required for a legal or contractual claim.

We do not sell data to third parties.

Occasionally photographs will be used in our promotional material which include identifiable individuals and as far as possible we obtain consent (verbally but ideally in writing) for the use of the photograph/video before publishing. Where photographs are taken at trade shows, open house events and other public events, seeking permission might not be possible.

We share material, posts, photos and videos from publicly available sources such as social media (including, but not limited to, Facebook, Twitter, Instagram, YouTube, TikTok and LinkedIn etc) and the internet to promote our businesses and those of our customers and resellers. Where possible we gain permission to do so prior to sharing. Please note that we use multiple accounts across each platform including company linked and personal employee accounts.

We use Mailchimp for promotional mailouts and the data shared with [Mailchimp](#) is updated continuously. Access to this account is restricted and secure. You can read the Mailchimp Privacy policy [here](#) and their terms of use [here](#). If you would NOT like to receive newsletters please select the unsubscribe option in the next newsletter or email privacy@picotesolutions.com

Transfer of data outside of the EEA will occasionally be made to Picote Solutions Inc in the USA. Picote Solutions Inc. will only use this data for the purposes outlined above and in-line with EU-US Privacy Shield Guidelines.

When using the Institute your data is only shared within Picote companies where necessary for the purposes mentioned above.

Within the Institute the following aspects of your data can be shared with other users within your specific access zone, or branch:

- Username
- Online content posted by you and the time stamp of this
- Online content posted by others as a result of your interaction
- Your photo (if provided)

Other data collected are retained for internal use only as described in this policy.

Data storage and retention

Personal Data for all customers is kept in our system indefinitely until it is updated or deleted. Data is kept and used for promotional emails and business communication only, until consent is withdrawn.

Data is stored on a small and restricted number of password protected computers, laptops, tablets, mobile phones and company servers. We may also store data using software including, but not limited to: Outlook, Just Host, Microsoft Teams, Dropbox, Google Docs, Wix, WhatsApp, WeChat and Wrike. All devices are password protected. Access is limited to the personnel sending the mailouts.

Data is also stored within social media accounts, feeds and messages (these include company linked and personal accounts) where communication between Us, You, Resellers and the Institute have

occurred. Please refer to the Privacy Policies of the individual social media platforms in questions for more information. Such retention would only normally happen via social media if you had engaged with us through this method.

Paper copies of your data are only made where necessary and these are securely shredded once their use is complete.

We use Mailchimp for promotional mailouts and the data kept with [Mailchimp](#) is updated continuously. Access to this account is restricted and secure. You can read the Mailchimp Privacy policy [here](#) and their terms of use [here](#).

Within the Institute, and in multiple areas of the platform, data is stored by Docebo LMS, a GDPR compliant company. This data is stored behind the scenes and tied to the users account.

Your rights:

You have certain rights regarding your personal data:

- The right **to be informed** about the processing of your personal information
- The right to have your personal information **corrected if it is inaccurate** and to have **incomplete personal information completed**
- The right **to object** to processing of your personal information
- The right **to restrict processing** of your personal information
- The right **to have your personal information erased** (the “right to be forgotten”)
- The right to **request access** to your personal information and to obtain information about how we process it
- The right to **move, copy or transfer your personal information** (“data portability”)
- Rights in relation to **automated decision making which has a legal effect or otherwise significantly affects you**

You have the right to complain to the Information Commissioner’s Office which enforces data protection laws: <https://ico.org.uk/>

You can contact us using the details below or by emailing privacy@picotesolutions.com

Questions and concerns:

If you have any questions or comments or if you wish to change, update, delete or add to any of the personal information we hold about you, or you have a concern about the way in which we handle your data, please contact us by post or email at:

Picote Solutions UK Ltd

Attn: Data Protection Officer

30a Rose Street

Wokingham

Berkshire

UK

RG40 1XU

privacy@picotesolutions.com