

# **PRIVACY POLICY**

## **1. Scope**

This Privacy Policy explains how we collect and use personal information. Personal information means any information relating to an identified or identifiable natural person; one who can be identified, directly or indirectly, by reference to an identifier such as name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We Securilec UK Limited trading as Detectalink Security & Safety Solutions and SecurilecAV care about your privacy and are committed to protecting your personal information in accordance with fair information practices and applicable data privacy laws.

We collect personal information in a variety of ways through our normal business activities, both online and offline. This includes, for example, when you place orders or purchase products or services, enter into agreements or communicate with us via email, post or visit and use our websites. We also receive personal information from our customers in order to perform services on their behalf.

## **2. Identity of Data Controller**

Securilec UK Limited is a “Data Controller” which means we are responsible in deciding how we hold and use personal information about you. Our registered office is Securilec UK Limited, Rouen House, Rouen Road, Norwich, NR1 1RB. Our full contact details are available through our website [www.securilec.co.uk/contact-us](http://www.securilec.co.uk/contact-us).

## **3. Categories of Personal Information**

Personal information that we may collect and process includes:

- Contact information that allows us to communicate with you, such as your name, job title, age and prefix, username, mailing address, telephone numbers, email address or other addresses that allow us to send you messages, company information and communication information you provide on our website.
- Relationship information that helps us do business with you, such as the types of products and services that may be of interest to you, contact and product preferences, creditworthiness, marketing preferences and demographic data.
- Transactional information about how you interact with us, including purchases, inquiries, customer account information, order and contract information, delivery details, billing and financial data, details for taxes, transaction and correspondence history and information about how you use and interact with our websites and social media pages through Facebook, Twitter, Instagram, Linked In and Google.

- Security and Compliance Information that helps us to secure your interests, including information for conflict checks, fraud prevention and internal verification, as well as information necessary for the security of our premises, such as visual recordings.
- Our products may collect system and event information relating to their setup, configuration and operation, as well as information collected by our products in their ordinary course of operation. This information may include site location data such as postal codes, room and location details, sensor data, equipment data, energy usage data, fault data, event data, environmental data, and other internal or external data as well as product usage information and product performance data. In some circumstances, this information may be Personal Data. In the case of video or security products, the information may also include video and audio signals and data. Our home automation products may track the movements of customers including occupancy times, media that is listened to, lighting levels, climate and security system actions in order to trigger automatic control of the systems installed, these include voice assistants that are always awake, listening and connected to the internet to provide voice activated control features of the systems installed. The nature and extent of the information collected by our products will vary based on the type and function of the product and the type of services for which they are used, subject to applicable laws.

#### **4. Legal basis for Processing your Personal Information**

To allow the performance of a contract with our customers and suppliers and those that are the legitimate interests of Securilec UK Limited of which are our usual business activities.

#### **5. What we use your Personal Information for**

- To fulfil your orders for products or services and any related activities, such as product and service delivery, customer service, account and billing management, support and training, product update and safety related notices, and to provide other services related to your purchase.
- To manage our contractual obligation and your ongoing relationship with us, including interacting with you, analysing and improving the products and services we offer, informing you about our products or services, as well as special offers or promotions.
- To ensure the security of our websites, networks and systems, premises as well as protecting us against fraud.
- To manage our everyday business needs, such as payment processing, financial account management, contract management, website and social media administration, product development, audit, reporting, certification bodies and legal compliance.

#### **6. Recipients of Personal Information**

We may use Third Parties to provide or perform services and functions on our behalf including Industry Governing and Certification Bodies, Alarm Receiving Centres and Cloud based App control services. We may make personal information available to these third

parties to allow them to perform these services and functions. Any processing of that personal information will be on our instructions and compatible with the original purposes.

As required by Law, we may also make personal information concerning individuals available to other authorities including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services including HM Revenue and Customs and courts in the UK. Where permitted by law, we may also disclose such information to third parties (including legal bodies) when necessary for the establishment, exercise or defence of legal claims or to otherwise enforce our rights, the protection of our property or the rights, property and safety of others or as needed to support external audit, compliance and internal governance functions.

## **7. International Transfers**

The third parties or their subsidiaries and affiliates to which your personal information can be disclosed may be located throughout the world, therefore information may be sent to countries having different privacy protection standards than the UK. In such cases, we take measures to ensure that your personal information receives an adequate level of protection as per our company policy and contractual terms which set the standard for processing the personal information collected and processed by us.

## **8. Retention.**

We will retain your personal information for as long as it is necessary to achieve the purpose of which it was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law.

## **9. Security of your Personal Information.**

We apply appropriate technical, physical and organisational measures that are reasonably designed to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access, and against other unlawful forms of processing. Access to personal information is restricted to authorised recipients on a need-to-know basis. We maintain a comprehensive information security program that is proportionate to the risks associated with the processing. The program is continuously adapted to mitigate operational risks and to protect personal information, taking into account industry-accepted practices. We also use enhanced security measures when processing any sensitive personal information.

Your personal information is stored on Securilec UK Limited's server and the dedicated servers of companies that we hire to provide us with cloud based storage services. These cloud services utilise encryption technology to maintain the security of our and your personal data. We continually monitor all third party services that we use in ensuring that your personal data is protected.

In some instances we process personal information on behalf of our customers as a service (in a data processor capacity). We collect and process this personal information only as instructed by our customer and will not use or disclose it for our own purposes. We maintain information security controls to protect your information and will only disclose or transfer the personal information as instructed by the customer or to provide the requested service.

Unless otherwise instructed by the customer, we treat the personal information we process on behalf of our customers in line with our commitments on disclosure and transfer as set forth in this notice.

Sending information over the internet is generally not completely secure and we can't guarantee the security of your data while it is in transit. Any data that you send over the internet to us is at your own risk.

## **10. Our Websites**

When you visit our websites, we may collect certain information by automated means using technologies such as cookies, browser analysis tools, server logs and web beacons. In many cases, the information we collect using cookies and other tools is used in a non-identifiable way without any reference to personal information.

A Cookie is a small text file that a website places on your computer or other device's hard drive through your web browser when you visit a website. We may use cookies to make website usage more efficient, and to tailor your browsing preferences and improve the functionality of our websites. Cookies can be used in performance management, and for collecting information on how our website is being used for analytical purposes. There are two types of cookies, these being session cookies which are deleted from your device after you leave the website and persistent cookies which remain on your device for longer or until you manually delete them.

We may also use Flash cookies (also known as Local Stored Objects) and similar technologies to personalize and enhance your online experience. The Adobe Flash Player is an application that allows rapid development of dynamic content such as video clips and animation. We use Flash cookies for security purposes and to help remember settings and preferences similar to browser cookies.

Our website hosting company may use server logs to also collect technical information about how users utilise our websites (usage data). This data may include a user's domain name, language, your browser type and operating system, internet service provider, Internet Protocol (IP) address, the site or reference directing the user to the website, the website you were visiting before you came to our website and the website you visit after you leave our site, the amount of time you spent on our website and which pages were visited. This usage data allows our website company to monitor, feedback information and measure the websites performance allowing us to improve the websites design, functionality and security.

You can change your browser settings to block or notify you when you receive a cookie, delete cookies or browse our website using your browser's anonymous usage setting. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings. If you do not agree to our use of cookies or similar technologies which store information on your device, you should change your browser settings accordingly. You should understand that some features of our websites may not function properly if you do not accept cookies or these technologies.

We may provide links to third parties' websites linked from our websites. These linked websites are not necessarily reviewed, controlled or examined by us. Each linked site may have its own terms of use or privacy policy and users should familiarize themselves and

comply with the terms when using the linked sites. We are not responsible for the policies and practices of any linked site and additional links to other sites that they may contain. These links do not imply our endorsement of the linked sites or any company or service and we encourage users to check these linked site's own privacy policies before submitting any personal data to them.

We do not undertake any form of electronic payment or accept customers banking details through our website and advise our customers not to submit any form of banking or other account details through our website contact pages or email communication.

Our websites are not directed at children and we do not use our websites to knowingly solicit personal information from or market to children. If we learn that a child has provided personal information through one of our websites, we will remove that information from our systems.

We may also use Google Analytics on our website to gather information about your online activity on our websites, such as the web pages you visit, the links you click, and the searches you conduct on our websites. We may use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website, where visitors have come to the site from and the pages they visited. The information generated by those cookies and your current IP-address will be transmitted by your browser to and will be stored by Google on servers in the United States and other countries. Google will use this information on our behalf for the purpose of evaluating your use of our website as described above. The IP address collected through Google Analytics will not be associated with any other data held by Google. For more information about the information gathered using Google Analytics please visit <http://www.google.com/intl/en/analytics/privacyoverview.html>. You can prevent these cookies by selecting the appropriate settings on your browser. If you do this you may not be able to use the full functionality of our websites. You may download and install the Google Analytics Opt-out Browser Add-on available here: <http://tools.google.com/dlpage/gaoptout>.

## **11. Your Rights**

You have a right to ask us to confirm whether we are processing information about you, and to request this information ("right of access"). You may request to rectify, or update your inaccurate or out-of-date personal information by contacting our Data Processor at our office detailed in section 2 ("right to rectification"). To the extent of applicable law, you have the right to request erasure of your personal information ("right to be forgotten"), restriction of processing as it applies to you if you contest its inaccuracy or the processing is unlawful ("right to restriction"), object to processing and the right to transfer your personal information to another party ("right of portability").

You may also have the right to lodge a complaint with the Information Commissioner's Officer (ICO). The ICO can be contacted by telephone on 0303 123 113 or by email at [casework@ico.org.uk](mailto:casework@ico.org.uk). You can also visit the ICO's website at <https://ico.org.uk/>

## **12. Consent and Withdrawal of Consent**

By providing personal information to us, you understand and agree to the collection, processing, international transfer and use of such information as set forth in this Privacy Notice. Where required by applicable law we will ask your explicit consent.

You may always object to the use of your personal information for direct marketing purposes or withdraw any consent previously granted for a specific purpose, free of charge by clicking on relevant links on our websites, following the directions contained in an email or by contacting our Data Processor at our office detailed in section 2.

### **13. How to contact us**

If you would like to communicate with us regarding privacy issues or have questions, comments or complaints, please contact our Data Processor at our office detailed in section 2.

### **14. Modifications to our Privacy Policy**

We reserve the right to change, modify, and update this Privacy Policy at any time. Please check periodically to ensure that you have reviewed the most current notice. This policy was last updated on 14<sup>th</sup> May 2018.