

Wireless CCTV Privacy Notice

Wireless CCTV Limited, registered at Charles Babbage House, Kingsway Business Park, Rochdale, United Kingdom, OL16 4NW (company number 04192399) with ICO registration number ZA163619 (**WCCTV, we, us or our**) respects your privacy and your rights to control your personal data. We are committed to providing clear information about the types of personal data we collect and our reasons for collecting it.

We are the 'Controller' of your personal data for the purposes of applicable data protection laws, including the UK General Data Protection Regulation (**UK GDPR**) and the Data Protection Act 2018 (together, the **Data Protection Legislation**).

This Privacy Notice applies to users of our website <https://www.wcctv.co.uk/>, customers that engage us to provide products or services and to our suppliers and contractors. Please read it carefully as it contains important information on what personal data we collect about you, what we do with that information, the situations in which we may share your information with other organisations and your rights.

WCCTV endeavours to protect the security of your personal data, and prevent data breaches from occurring. As an ISO27001 certified organisation, our corporate culture is focused on data security. Our information security management processes and systems are designed for security, and these are regularly reviewed and audited both internally and externally.

We do not sell personal data to third parties.

The content covered in this Privacy Notice includes:

- the types of personal data we collect
- our legal basis for using personal data
- how we use personal data
- how we share personal data
- security, storage and retention of personal data
- your rights
- our use of cookies and other similar technologies
- how to contact us
- changes to our privacy notice

How to contact us

If you have any questions about this Privacy Notice or want to exercise the rights set out in this Privacy Notice, please contact privacy@wcctv.com.

The types of personal data we collect

When you use our website, we may collect technical information such as your internet protocol (IP) address, your login data, 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 this website.

If you log in to the website, we will process your email address and password for the purposes of allowing you access to your user account.

We collect information you voluntarily provide to us via the website or otherwise, such as your name, phone number and email address; for instance, when you complete the 'contact' form on the website, place an order, request more information on WCCTV's products or services (including via email, telephone, on our website or at tradeshow), when you contact our customer support team for technical assistance or when you are contacted by one of our business development representatives. Information we collect and store for these purposes may include:

- Your name
- Your home or work address, email address and telephone number
- Your job title
- Your payment and delivery history, including billing and delivery address
- Types of WCCTV products you use
- IP address of any WCCTV Camera you use
- Site name and address (rental customers)
- Any other info you provide

Our legal basis for using personal data

We primarily rely on the following legal bases to process (including collecting, using and storing) your personal data:

Performance of a contract

We rely on this legal basis, where the processing of your personal data is necessary to perform any contract you have with us. For example, to complete your purchase or rental of any WCCTV product, to help with delivery, to handle returns and to ensure your WCCTV product performs its basic functions in a secure way.

Legitimate interest

We rely on this legal basis, where it is necessary to use your personal data for our legitimate business interests or those of third parties.

For example, we rely on our legitimate interest to process personal data in order to analyse and improve WCCTV products and/or service, to improve performance, content and functionality on our websites, to send you notifications about software or firmware updates or to use your personal data for administrative, fraud detection or legal purposes.

We may process data to produce marketing communications on the grounds that the recipient has a legitimate interest in, or requirement for, our products and services.

In all instances where we use our legitimate interests in this regard, we complete and record a Legitimate Interest Assessment (LIA) and balance our business interests against individual's rights as described by the ICO here - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

Where we process your personal data based on our legitimate interest, you have the right to object (as set out in the 'your rights' section below).

How we use personal data

We use your personal data listed above for the following purposes:

- 1. Operating the website**
- 2. Use of cookies and other similar technologies**
- 3. Providing you with products or services (including contract management)**
- 4. Customer support**
- 5. Product improvement**

6. Security, safety, and dispute resolution
7. Business operations
8. Communication and marketing
9. Supplier and contractor management

Operating the website

We use the technical data collected in relation to your device to deliver optimised website content to your device. We may also use this data, if required, for security or legal purposes.

This processing is necessary in our legitimate interest to improve the quality of your visit to the website, ensure the security of the site and meet our legal obligations.

If you fill in forms on the website, we will use your name, contact details and any other information voluntarily provided by you to respond to your query on the basis of our legitimate interest.

If you log in to the website, we will use your email address and password for the purposes of allowing you access to your user account on the basis of our legitimate interest.

Our use of cookies and other similar technologies

We use cookies and similar technologies like pixels, tags and other identifiers to help us personalise our website for you, remember your preferences, understand how users are using our website, and help customise our marketing offerings. Further information is set out in our Cookie Policy <https://www.wcctv.co.uk/policies>

Providing you with products or services (including contract management)

If you (or your employer) make a purchase from us or enter into an agreement to receive our products or services (for example, on a rental basis), we use your personal data such as your name, phone number, email address, employer name, job title and department to establish and fulfill the contract.

This data allows us to verify your identity, take payments, communicate with you, provide technical support, and arrange the delivery or other provision of products or services.

This processing is necessary for us to perform a contract.

Customer support

If you (or your employer) are a customer, we use personal data such as your name, phone number, email address, employer name, job title and department to respond to incoming support requests, diagnose product problems, repair products and provide other customer care and support services.

This process may involve our customer support team connecting to your cameras so as to diagnose and/or repair an issue or provide or to provide training sessions. To complete this process, it is likely we will need your username and password. WCCTV does not keep a record of your username and password, and does not record telephone calls.

Unless you have expressly consented for us to do so via written agreement or contract, WCCTV does not record or store any videos taken from your cameras throughout the performance of any customer support request or any other activity.

This processing is necessary for us to perform a contract.

Product improvement

We use personal data such as purchase history for research purposes and to develop and improve our products and services, including maintaining and improving performance, developing and adding new features or capabilities and determining what new features to prioritise.

This processing is necessary to serve our legitimate interest to provide you with a good service and develop our business.

Security, safety and dispute resolution

We may use any personal data collected via the website or during our relationship with you to protect the security and safety of our products and our customers, to detect and prevent fraud, to resolve disputes and enforce our agreements.

This processing is necessary to serve our legitimate interest to protect the rights of our business and those of third parties.

Business operations

We may use any personal data collected via the website or during our relationship with you to develop aggregate analysis and business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of our business. Often the data will be anonymized and aggregated for these purposes.

This processing is necessary to serve our legitimate interest to manage our business.

Communication and marketing

We use personal data such as your name, contact details, purchase history, employer name, department and job title to deliver and personalise our communications with you.

For example, we may contact you by email or other means of electronic communication to inform you of security or software updates, update you on a support issue, or to invite you to take part in a surveys.

If you have not opted out of marketing, we may also contact you to inform you of new products or services, special offers and upcoming events.

This processing is necessary to serve our legitimate interest to provide you with a good service and send you information about products and services that may be of interest. For information about managing email subscriptions and promotional communications, please read the 'your communication and marketing preferences' section below.

We also use cookies and similar technologies, as set out in further detail in our Cookie Policy.

Supplier and contractor management

If you supply goods or services to us, or are a contractor, we may collect information about the relevant goods or services, your contact details, account details for payment and keep transaction records.

This processing is necessary for us to perform a contract.

If you fail to share personal data

If you fail to provide information which we require to fulfil our contract with you or meet our legal and regulatory obligations, then we may not be able to provide our products and services to you.

How we may share personal data

We may share your personal data where necessary to provide a service you have requested or authorised, with the third parties working on our behalf for the purposes described in your contract. In particular, WCCTV uses third-party monitoring stations to provide alarm monitoring and response for its site security systems in order to provide our site security services. These approved third party contractors have full relevant accreditations including NSI Gold Accreditation (BS5979 and BS8418) and SIA licensing.

We may also pass your personal data with third parties, including:

- other members of the WCCTV group for internal and administration purposes, or where necessary to provide services to you, subject to our procedures on international transfers (please see below);
- suppliers and service providers used by us in providing our goods and services, including IT service providers that provide file hosting and sharing platforms, and marketing agents we use to send marketing communications on our behalf; and
- our professional advisers, auditors, insurers and brokers.

Occasionally, we may also share personal data with relevant third parties:

- where you have given us your consent to do so;
- where we are under a duty to disclose or share your personal data with law enforcement agencies and regulatory bodies, or otherwise for the prevention or detection of crime;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- to enforce or apply our agreements, or to protect the rights, property or safety of our group, our customers or others; or
- where it is fair and reasonable for us to do so in the circumstances (for example, to protect your vital interests or the vital interests of another natural person).

For questions about third party suppliers, please send an email to privacy@wcctv.com.

Security, storage and retention of personal data

Security

As an ISO 27001 accredited business, WCCTV has a firm commitment to the security of personal data. We have processes and procedures in place that are regularly reviewed internally and externally to ensure every step is taken to ensure the protection of your personal data.

WCCTV takes precautionary measures to help prevent information about you from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction.

For example, we store the personal data you provide on computer systems that have limited access and that are in controlled facilities. We also ensure that our third-party data centre vendors provide adequate security measures. Additionally, your data is protected with encryption, such as Transport Layer Security (TLS), during transition over the Internet.

You can only access your WCCTV systems via an individual user login and password. To protect the confidentiality of personal data, you must keep your password confidential and not disclose it to any other person.

Please notify us immediately if you believe your password has been misused. Please note, we will never ask you to disclose your password in an unsolicited phone call or email. However, we will request this information should you contact our technical support team and request for us to connect to one of your cameras to diagnose any issues.

While we take reasonable precautions to guard the personal data we collect, no security system is impenetrable.

If you have any questions about the security of your personal data, you can contact us at privacy@wcctv.com.

International transfers

Personal data collected by WCCTV may be stored and processed in your region, in the United States, or in any other country where WCCTV or its subsidiaries or service providers are located or maintain facilities. In some cases, the local data protection laws may not provide the same level of protection as those in the UK.

In particular, if you have requested a service outside the UK, we may share your personal data with a WCCTV company or partner in the relevant jurisdiction. We also use certain IT providers that are located in the United States.

WCCTV has put in place adequate mechanisms to protect personal data when it is transferred outside the UK in accordance with the Data Protection Legislation. These include:

- **Adequacy decisions:** We will transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal information by the UK.
- **Standard Contractual Clauses:** Where we need to transfer your personal data outside the UK to a country which is not recognised as providing adequate protection, we may use specific contracts approved by the UK which give personal data similar protections as it has in the UK.

Please contact us at privacy@wcctv.com if you would like further information on the specific mechanisms used by us when transferring your personal data outside the UK.

Retention

WCCTV will retain your personal data for as long as we deem it necessary to enable you to use the WCCTV product, to provide services to you, to comply with applicable laws (including those regarding document retention), resolve disputes with any parties and otherwise as necessary to allow us to conduct our business.

We will never retain personal data for any longer than is necessary for the purposes for which we need to use it, including for the purposes of satisfying any legal, accounting or reporting requirements.

If you have opted out of receiving marketing communications from us, we will need to retain certain personal information on a suppression list indefinitely so that we know not to send you further marketing communications in the future. We may also still need to keep your information for ongoing contractual purposes if you continue to be our customer and for legal, accounting and regulatory reporting reasons.

All personal data we retain will be subject to this Privacy Notice and our internal retention guidelines. If you have a question about a specific retention period for certain types of personal data we process about you, please send an email to privacy@wcctv.com.

Your rights

The Data Protection Legislation gives you certain rights in relation to how your personal data is used by us. In addition to the right to be informed (as set out in this Privacy Notice):

- you can ask us for a copy of the personal data we hold about you;
- you can inform us of any changes to your personal data, or if you want us to correct any of the personal data we hold about you;
- in certain situations, you can ask us to erase, block or restrict the personal data we hold about you, or object to particular ways in which we are using your personal data;
- in certain situations, you can also ask us to send the personal data you have given us to a third party (i.e. data portability);
- where we are using your personal data on the basis of your consent, you are entitled to withdraw that consent at any time; and
- where we process your personal data based on legitimate interest for marketing or any other purpose, you have the right to object at any time to that use of your personal data.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure. Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request – for example, we may not be able to stop processing or erase your personal data if it is needed for legal reasons or in connection with legal claims.

We rely on you to ensure that your personal data is complete, accurate and up to date. Please do inform us promptly of any changes to or inaccuracies in your personal data by contacting privacy@wcctv.com.

We will usually respond to your request as soon as possible within one calendar month.

We are committed to working with you to obtain a fair resolution of any complaint or concern you may have about our use of your personal data. If, however, you believe that we have not been able to assist with your complaint or concern, you can report any issues or concerns to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.

Your communication and marketing preferences

Every marketing communication sent to you from WCCTV will contain a link for you to 'opt-out' of receiving further correspondence. You can also opt out of receiving email marketing messages by contacting privacy@wcctv.com and asking to be removed from any and all subscription lists. We respect your choice, and we will no longer send you promotional emails once you unsubscribe.

Please note, regardless of any amends you make to your marketing and communication setting, we will continue to communicate with you regarding any changes to WCCTV's terms and conditions, policy updates, WCCTV software or firmware updates, routine customer service messages such as

information about current or past purchase, delivery of products, service interruptions, data breaches or other significant information about a product you own such as airtime and warranty expiration, safety issues and product recalls.

WCCTV as Processor

We may act as Processor for our customers in relation to CCTV footage, if we are asked to process it on our customers' behalf. In this case, the customer will be the Controller and will only process the footage in accordance with our customer's instructions and our contract.

Changes to this Privacy Notice

WCCTV may modify or update this Privacy Notice when necessary, to reflect customer feedback and changes in our products and services. We encourage you to regularly review this Privacy Notice to learn more how WCCTV is using and protecting your information. If we make any material changes to the manner in which we process and use your personal data, we will contact you to let you know about the change.