

# SMC Privacy Notice (“Notice”)

This Privacy Notice addresses how Security Monitoring Centres Limited, Littleton Road, Ashford, Middlesex TW15 1TZ (“SMC”) may collect and process personal information from you, *separate and apart from its websites and mobile applications*. The privacy notice for the SMC website is available on that particular website.

SMC interacts with individuals in a variety of ways: employees of SMC customers, contact persons of SMC customers and end users of SMC products and services. To enable these interactions, SMC is collecting and processing personal information. SMC has implemented technical, organizational, administrative, and physical measures to safeguard any personal information SMC may process. As this Notice is intended to cover a variety of situations, some information in this Notice may not apply to you.

This Notice may be modified from time to time without prior notice. Please review this Notice on a regular basis for any changes. The effective date of the current version appears at the end of this Notice.

## What personal information might SMC collect?

The personal information that SMC collects is subject to applicable legal and contractual requirements. Because this Notice covers a wide variety of situations, there may be data elements listed here that do not apply to your specific situation. Please contact SMC if you have any questions.

### Type of personal information

Name and salutation (such as Mr. or Mrs.)
Emergency contact information
Work contact information, including telephone number, email address, mailing address, and work location
Home address, personal email address and home telephone number, including personal mobile telephone number
Information about an individual's employer, including company name(s), company location(s), company address(es), and country of incorporation
Job title, department and job function
Visitor information, including the time of arrival and departure, date, name visitor, name company, location of visits, information regarding the vehicle for parking purposes, information required for a badge (which may include a photograph), visitor's signature and information necessary to maintain visitor logs and screening.
Payment and invoice-related information, including identification and bank account numbers
Information collected through a voluntary survey or promotional campaign
Record of any incident that occurs while on SMC premises
Information that may be collected as part of the execution of the contract, such as time and attendance data, badge information, photographs, audio, video, or geolocation data used for a particular role or assignment
Government-issued identification numbers (in whole or in part), such as a tax identification number, VAT number
Information provided to facilitate a service or request assistance, such as product use or problem information
Information required to process a claim or any information that a person chooses to include in a document that is part of a legal proceeding involving SMC
Live video images when responding to alarm triggering events, and audio recordings

<p>In case of IP connections with the SMC alarm center: IP addresses are stored.</p> <p>In case of SMC's Tracking &amp; Tracing services: location is stored.</p> <p>In case of SMC's video services: username / password, IP addresses and video images are stored.</p> <p>For the Alarm Processing System: the log book is stored (and in some cases access information).</p> <p>In case of monitoring of (ex) prisoners: criminal background info might be stored.</p>
<p>Information regarding health and injuries, such as disability, sickness, accident related info, and other related information that may be part of video images, recorded conversations, and actions linked to responding to alarm triggering events</p>

## How might SMC use the personal information it collects?

### Purpose

<p>Conducting regular business operations, including designing and developing products, managing an Enterprise Resource Planning (ERP) system, sending invoices and collecting payment, providing payment, and providing goods and services to customers, which may include sharing limited personal information with customers or other business partners</p>
<p>Providing requested products and services, which may include use of geolocation for certain applications in a known and transparent manner</p>
<p>Managing communications and notices</p>
<p>Managing physical security, including access controls and security, facility access and safety, and disaster preparedness</p>
<p>Responding to alarm triggering events</p>
<p>Overseeing location tracking, duration, and other telematics of certain SMC assets and applications for management of services provided, security, safety, and efficiency</p>
<p>Ensuring compliance with import, export, and other international trade controls, including screening for sanctioned or restricted countries or parties</p>
<p>Performing audits and compliance reviews to ensure compliance with applicable policy, regulation, and law</p>
<p>Conducting and managing internal and external investigations, including Legal, Global Ethics &amp; Compliance, and International Trade Compliance reviews and any resulting disclosures to government agencies</p>
<p>Evaluating and reporting conflicts of interest</p>
<p>Addressing environmental, health, and safety issues, including injury and damage claims</p>
<p>Prosecuting and defending claims in litigation, arbitration, administrative, or regulatory proceedings, including but not limited to pre-dispute activity, evidence collection, discovery, litigation holds and e-discovery efforts</p>
<p>Responding to law enforcement and other government inquiries</p>
<p>Administering of marketing, contract, joint ventures, and other business efforts, including without limitation invoice and payment processing, project management, and customer surveys and promotions</p>
<p>Designing, selling, producing, and improving products</p>
<p>Providing customer service and support</p>
<p>As required or expressly authorized by applicable law or regulation</p>
<p>For training of SMC employees and quality purposes of SMC products and services</p>

- The Alarm Processing System
  - For alarm processing of incoming alarms (log book is stored and in some cases access information)
  - National Response whereby a security agency is getting orders from SMC (e.g. by checking on the location in case of an alarm) and whereby the name, address and telephone number of the customer can be provided
- Video platforms
  - To be able to assess the video images
  - In case of an alarm, SMC employees and the local police can watch “live” video images
- ERP system
  - For the contract administration and invoicing
- Tracking & Tracing application
  - For locating
- Teleservice application
  - For handling incoming messages at the teleservices
- Archive
  - For storage of the customer's file

Responding to situations involving a risk of health or safety, including an emergency and accident

## With whom might SMC share the information it collects?

SMC will not sell or otherwise share your personal information outside SMC, except to:

- Carrier group companies, on a strict ‘need to know’ basis (e.g. for internal audit purposes), and based on the Binding Corporate Rules
- service providers SMC has retained to perform services on SMC behalf. SMC will only share your personal information with service providers with whom SMC has signed a processing agreement except as necessary to perform services on SMC behalf or to comply with legal requirements, including but not limited to in response to a legitimate legal request from law enforcement authorities or other government regulators;
- investigate suspected or actual illegal activity;
- prevent physical harm or financial loss; or
- support the sale or transfer of all or a portion of SMC business or assets, including through bankruptcy.

## Where does SMC store your personal information?

SMC stores your Personal Information in United Kingdom. Personal Information may also be stored worldwide, however there are Binding Corporate Rules or Data Transfer Agreements in place should the information be shared. Further, for customer and visitor screening, the control is carried out via an automated database of one of SMC’s service providers currently located in the United States. SMC has signed a data transfer agreement with the service provider to guarantee the protection of the data.

## How long does SMC retain Personal Information?

SMC retains personal information for the length of time required to fulfill the purpose for which it was originally collected and for any additional period as required by applicable law or regulation, court, administrative or arbitration proceedings, or audit requirements.

## What choices do you have about how SMC uses your personal information?

SMC will use your personal information for executing its contractual obligations towards its customers and business partners.

You will always have a choice about whether SMC uses your personal information for direct marketing purposes. If you have provided SMC with your personal information and would now like to request that it is no longer used for marketing purposes, please contact [sales@smc-net.co.uk](mailto:sales@smc-net.co.uk)

You have the right to lodge a complaint with the Information Commissioner's Office. You also have the right to withdraw consent, to request access to and correction or erasure of your personal information, seek restrictions on or object to the processing of certain personal information, and seek data portability under certain circumstances. To contact SMC regarding the above, please email [sales@smc-net.co.uk](mailto:sales@smc-net.co.uk)

### **How can you contact SMC?**

If you wish to access, correct or update your personal information, or if you have questions about SMC's privacy practices in general or a complaint, please email [sales@smc-net.co.uk](mailto:sales@smc-net.co.uk)

Last Updated: 3 December 2020