



## **Privacy Policy**

# Document Control & Version Updates

Document Control	
Reference:	
Issue No:	1
Issue Date:	24/05/2018

## Version Control

Version	Reason for Change	Changes By	Date of Change
1	n/a	n/a	n/a

# Contents

Privacy Policy.....	1
Document Control & Version Updates .....	2
Version Control.....	2
Key summary .....	4
Introduction.....	5
What is the purpose of this privacy policy?.....	5
Our data protection officer.....	5
Changes to this policy .....	5
The personal information we collect about you.....	6
Personal information we collect about others .....	7
How we use your personal data .....	8
Who do we share your information with?.....	10
When will we send you marketing/promotional communications?.....	10
How can you change what marketing/promotional communications you receive and how you receive them?.....	10
How we store your personal information.....	11
Security of your personal information.....	11
Data retention.....	11
Your legal rights.....	12
No fee usually required .....	12
What we may need from you .....	12
Time limit to respond.....	12
Links .....	12
Code of Practice .....	13
Website Contact.....	13
Correction/updating of personal information .....	13
Transfer of your personal information.....	13
Data Commissioner Registration.....	13
Data Breach Notification .....	14
Implementation of Policy.....	14

## Key summary

RE:SURE values your personal information and privacy.

We collect, process and store information when you share with us when you submit your personal information via our websites, use our apps, call, email and write to us and when you utilise any services provided by RE:SURE.

Once you choose to provide us with personal information, RE:SURE will only use your information in accordance with the RE:SURE Privacy Policy and Data Protection Policy.

Some of the services we offer are facilitated by third parties and if you purchase those services that third party will have access to information about you also.

We also use various support and other functions, which may require the transfer of your personal data to and from other countries from time to time, both within and outside of the European Economic Area. Please note that by using this website/application, you are agreeing that your data may be sent to and processed in other countries with varying data protection laws.

Your continued use of this website/application constitutes your agreement with this Privacy Policy. If you cannot agree with these terms, please exit website/application.

This Privacy Policy explains what Personal Information we process, why we process it, how it is legal and your rights.

We use cookies, which are text files containing small amounts of information are downloaded to your computer or mobile device.

If you have any questions or comments, please contact our Data Protection Team:  
[datacare@resure.co](mailto:datacare@resure.co)

# Introduction

We are RE:SURE Intelligence Ltd, T/A RE:SURE. For the rest of this document, the company will be referred as us, we, the company or RE:SURE.

We are a Controller under Data Protection Law and take your privacy seriously. We ask that you read this Privacy Policy very carefully because it contains important information about how we process your Personal Information and your rights.

If you would like this notice in another format please contact our Data Protection Officer using the contact details provided below.

## What is the purpose of this privacy policy?

This Privacy Policy sets out the basis on which any Personal Information we collect from you, or that is provided to us by a third party, will be processed by us.

## Our data protection officer

If you have any questions about this Privacy Policy or Personal Information that we hold about you, including any requests to exercise your rights, please contact our Data Protection Officer using the details set out below:

Data Protection Officer  
RE:SURE  
Unit 15A Kilcronagh Business Park  
Cookstown Co Tyrone  
BT80 9HJ  
Northern Ireland  
Email: [dpo@resure.co](mailto:dpo@resure.co)

## Changes to this policy

This privacy policy may be updated from time to time. If the change impacts you or your Personal Information, we will inform you of changes made.

## The personal information we collect about you

We collect or store Personal Information about you at different points in our relationship with you:

- when you browse or visit our website or use our apps;
- if you sign up for a service with us (i.e. Remote CCTV monitoring, Alarm monitoring, Remote Access Control Services, Personal protection solutions, RE:SURE GO or any other services provided);
- if you enter a competition or provide feedback;
- if you email, write or call us.
- If we engage with you in the sales process, either by you contacting us or us contacting you

If you sign up for a service offered by us through a third party (for example an Alarm/CCTV installer), then that third party will send us Personal Information about you that we will use to provide the service.

We collect the following Personal Information:

Type of Personal Information	Personal Information includes:
Monitoring Data	<ul style="list-style-type: none"><li>• Site Name</li><li>• Site Address</li><li>• Key Holders Names</li><li>• Key Holders Phone Numbers</li><li>• Email address</li><li>• Site specific information (passwords, activity, working times etc)</li><li>• CCTV Images/videos</li></ul>
Financial Data	<ul style="list-style-type: none"><li>• Bank account</li><li>• Sort code</li><li>• Payment card details</li><li>• Details about payments to and from you</li><li>• Details of hardware and services you have purchased from us</li></ul>
Contact Data	<ul style="list-style-type: none"><li>• First name</li><li>• Last name</li><li>• Email</li><li>• Phone numbers</li></ul>
Identity Data – RE:SURE Go specific	<ul style="list-style-type: none"><li>• First name</li><li>• Maiden name</li><li>• Last name</li><li>• Username or similar identifier</li><li>• Title</li><li>• Date of birth</li></ul>

	<ul style="list-style-type: none"> <li>• Gender</li> <li>• Bio Details</li> <li>• Medical History</li> <li>• Emergency Contact Name</li> <li>• Emergency Contact Phone Number</li> <li>• Location</li> </ul>
Marketing and Communications Data	<ul style="list-style-type: none"> <li>• Your preferences in receiving marketing from us and our third parties</li> <li>• Your communication preferences</li> </ul>
Technical Data	<ul style="list-style-type: none"> <li>• Internet protocol (IP) address</li> <li>• Login data</li> <li>• Browser type and version</li> <li>• Time zone setting and location</li> <li>• Browser plug-in types and versions</li> <li>• Operating system and platform</li> <li>• Other technology on the devices you use to access our website or our app</li> </ul>
Usage Data	<ul style="list-style-type: none"> <li>• Information about how you use our website, app and services</li> </ul>

## Personal information we collect about others

Due to the nature of our business, we often require Personal Information about other people connected to you, your business or your premises (e.g. other keyholders or emergency contacts). You must have their consent to provide us with such Personal Information.

## How we use your personal data

Below is a summary of what we use your Personal Information for and the lawful basis on which we can process your Personal Information:

Purpose	Type of Personal Information	Lawful basis for processing	Details
<p>To connect to a CCTV or alarm system at a premises and to carry out monitoring of these systems for which you are associated</p> <p>To inform you of any problem with this connection (e.g. loss of connection, cameras offline, false activations etc)</p>	Technical Data Monitoring Data	<p>Legitimate interest</p> <p>Consent</p> <p>Performance of a contract with you</p>	To enable monitoring of premises for customers
To register you for RE:SURE GO, our personal security application	Identity Data - RE:SURE Go	<p>Legitimate interest</p> <p>Consent</p> <p>Performance of a contract with you</p>	To enable monitoring your safety
To contact you in the event of an alarm or possible intrusion on your premises, or in the event of a RE:SURE GO panic alarm.	Monitoring Data Identity Data - RE:SURE Go	<p>Legitimate interest</p> <p>Performance of a contract with you</p> <p>Consent</p>	To fulfil our contract with you and inform you of any activity on your premises during monitoring times and to contact keyholders or other emergency contacts in the event of an alarm.
To allow you access to a property for which we carry out Remote Access Control services	Contact Data	Legitimate interest	To fulfil our contract with our customer, to whose site you are requesting access.



Purpose	Type of Personal Information	Lawful basis for processing	Details
To process payments for our services	Identity Data Contact Data Financial Data Transaction Data	Performance of our contract with you  Legitimate interest	To collect payments from you.  If we have a claim against you (for example, if you have broken your contract with us) it is in our legitimate interest to pursue that claim.
To enable you to participate in a prize draw or competition	Contact Data	Performance of the prize draw or completion terms and conditions  Legitimate interests Consent	To promote our business through prize draws and competitions to you. We will not send you any electronic marketing unless you have expressly consented to receive it.
To enable you to complete a survey	Contact Data Profile Data	Legitimate interests	To obtain feedback from you on our services so that we can make improvements to them.
To manage and protect our business and our website or applications (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Data Contact Data Technical Data Usage Data	Legitimate interests  Necessary to comply with a legal obligation	To manage our business and ensure the effective provision of administration and IT services, network security.  To prevent fraud.
To send marketing and promotional materials to you	Contract Data	Consent	To promote our services to you.

RE:SURE may process your Personal Information for more than one lawful ground depending on the specific purpose for which we are using your Personal Information. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Information where more than one ground has been set out in the table above.

Where we need to collect Personal Information by law or under the terms of a contract we have with you and you fail to provide that Personal Information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to inform you of a fire alarm at your premises). In this case, we may have to suspend or cancel the service to you.

## **Who do we share your information with?**

We take the sharing of your personal data very seriously and will, under no circumstances, share this data with a third party for marketing or sales purposes, if not directly related to our services.

There are, however, certain important and limited scenarios where we are required to share aspects of your personal data:

- To any third parties we transfer or may transfer duties under our agreement with you.
- To agencies, government departments and law and order authorities in order to comply with the existing laws.
- To our employees and agents to do any of the above on our behalf, now or in the future
- To third party organizations involved in credit card or direct debit authorisation.
- If we have a duty to do so or if the law allows us to do so.

If you have any particular concerns about which third parties, please contact our Data Protection Officer.

## **When will we send you marketing/promotional communications?**

When we collect information directly from you, we will ask you if you do not want to receive our marketing communications. Please be aware that we do sometimes send marketing communications that promote a third party's products and services (for example, those of our business partners) as well as our own.

We may ask if you consent to receiving marketing communications from other members of our group or from third parties.

We will respect your choice as to what communications you wish to receive and the methods by which they are sent to you.

## **How can you change what marketing/promotional communications you receive and how you receive them?**

If you no longer wish to receive marketing/promotional materials you may opt-out of receiving these communications, you may notify us by email: [datacare@resure.co](mailto:datacare@resure.co)

In addition, each marketing communication we send by email will also have an unsubscribe option which will allow you to stop you receiving further marketing emails. We aim to action requests to stop being sent marketing communications within 30

working days of receiving those requests, but it is possible you will receive some marketing in the period prior to that change being made.

## How we store your personal information

Most of the information we hold on you will be stored electronically. Even if you send us documents, we will usually scan these and then either return the originals to you or destroy them.

These are stored on physical hard drives and in cloud based services that are fully GDPR compliant. If you require more information on these services and their compliance levels, please contact us.

## Security of your personal information

RE:SURE use technical and organisational measures to safeguard your Personal Information, for example, we process all payment card transactions in accordance with the Payment Card Industry Data Security Standard and use secure connections to and from our servers and on our website and our applications to ensure that your Personal Information is encrypted.

We have rigorous processes in place for the storage of all data within the company, both personal and otherwise

While we will use all reasonable efforts to safeguard your Personal Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any Personal Information that are transferred from you or to you via the internet.

We are compliant with the following standards and work to the code of practices:

- BS:5979 - Remote Centres receiving signals from fire & security systems
- BS:8418 - Installation and remote monitoring of detector activated CCTV systems
- BS:8484 Provision of lone worker device services

This compliance is carried out by the Security Systems and Alarm Inspection Board (SSAIB)

We are also accredited by the Private Security Authority (PSA) in Ireland.

Our monitoring operative employees are all PSA and (Security Industry Authority) SIA Licensed in the UK.

If you have any particular concerns about your Personal Information, please contact our Data Protection Officer.

## Data retention

RE:SURE will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your Personal Information are available from us on request to our Data Protection Officer. CCTV imagery data will be kept for 30 days and then safely disposed of, unless we are asked to keep for legal purposes or retain for service provision, training or marketing, which we will obtain permission for.

## **Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us as per the process already outlined.

## **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **Links**

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of websites not operated by us. We encourage you to read the privacy statements of each and every web site that collects personally identifiable information. This privacy statement applies solely to information collected by our website.

## Code of Practice

RE:SURE subscribes to the CCTV Code of Practice and guidelines as described by the Data Commissioner and the UK Information Commissioners Office (ICO).

These guidelines and Code of Practice are available at:

<https://www.dataprotection.ie/docs/Data-Protection-CCTV/242.htm>

<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

## Website Contact

Contact [datacare@resure.co](mailto:datacare@resure.co) with questions or if you experience technical problems with this website.

## Correction/updating of personal information

If your personal identification information changes, or if you no longer desire our service, we will provide a way to correct, update or remove your personal information provided to us.

If you are concerned that any of the information we hold on you is incorrect, please Email us: [datacare@resure.co](mailto:datacare@resure.co)

## Transfer of your personal information

In the course of undertaking the activities, we may transfer personal information to countries which do not have data protection laws or to countries where your privacy and other fundamental rights will not be protected as extensively.

## Data Commissioner Registration

At the time of writing, RE:SURE is in the process of being registered with the Data Protection Commissioner of Ireland:

Data Protection Commissioner  
Canal House  
Station Road  
Portarlinton  
Co. Laois  
R32 AP23

# Data Breach Notification

All personal data breaches must be reported immediately to the Company's data protection officer.

If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the data protection officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

In the event that a personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the data protection officer must ensure that all affected data subjects are informed of the breach directly and without undue delay. Data breach notifications shall include the following information:

- a) The categories and approximate number of data subjects concerned;
- b) The categories and approximate number of personal data records concerned;
- c) The name and contact details of the Company's data protection officer (or other contact point where more information can be obtained);
- d) The likely consequences of the breach;
- e) Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

## Implementation of Policy

This Policy shall be deemed effective as of 24<sup>th</sup> May 2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.