

## **Wireless CCTV Privacy Statement – used by Wiltshire Council for the purposes of prevention and enforcement or fly-tipping and litter**

Wireless CCTV Ltd (WCCTV) respects your privacy and your rights to control your personal data. We are committed to providing clear information about the types of data we collect and our reasons for collecting it.

WCCTV's primary purpose for collecting personal data is to provide ongoing support and assistance to our clients, and to communicate with prospective clients in accordance with our legitimate business interests.

WCCTV endeavours to protect the security of your data, and prevent data breaches from occurring.

WCCTV has an information security management system in place, 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.

Our Privacy Statement has been designed to explain the personal information we collect from you, either directly or indirectly, and how we will use it.

The content covered in this Statement includes:

- The Types of Personal Information We Collect
- Our Legal Basis for Using Personal Information
- How We Use Personal Information
- How We Share Personal Information
- Security, Storage and Retention of Personal Information
- Your Rights
- Our Use of Cookies and Other Similar Technologies
- How to Contact us
- Changes to Our Privacy Statement

### **The Types of Personal Information We Collect**

We collect information you voluntarily provide to us, this is obtained by

- You placing an order
- You requesting further information on WCCTV's products and services
- You contacting WCCTV by telephone, e-mail or at tradeshow
- You contacting WCCTV using our websites
- WCCTV contacting you about our products and services
- Information we hold may include some of, if not all of, the following:
  - Your name
  - Your company address, company email address and company telephone number
  - Your job title
  - Your payment and delivery history, including billing and delivery addresses
  - Type and IP address of WCCTV products you use
  - Site name and address
  - Any other information you provide

### **Our legal basis for using personal information**

There are different legal bases that we rely on to use your personal information, namely:

### ***Performance of a contract***

The use of your personal information 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 interests***

We may use your personal information for our legitimate business interests.

For example, we rely on our legitimate interest to analyse and improve WCCTV products and/or services, to improve performance, content and functionality on our websites, to send you notifications about software or firmware updates or to use your personal information 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](#).

Where we process your personal information based on our legitimate interest we will always provide an optout mechanism.

Should you be unable to locate the opt-out mechanism in any communication you receive from us, you may exercise your right to object by sending an email to [privacy@wcctv.com](mailto:privacy@wcctv.com)

### **How we use personal information**

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

- 1. Providing you with products or services**
- 2. Customer Support**
- 3. Product Improvement**
- 4. Security, Safety, and Dispute Resolution**
- 5. Business Operations**
- 6. Communication and Marketing**

### ***Providing you with products or services***

We use your personal data to establish and fulfill a contract with you, for example, if you make a purchase from us or enter into an agreement to receive our products or services on a rental basis.

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***

We use personal data 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 to provide training sessions. To complete this process, it is likely we will need you to grant us temporary access to the cameras.

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 data 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.

### ***Security, Safety and Dispute Resolution***

We use data 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.

### ***Business Operations***

We use data to develop aggregate analysis and business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of our business. This processing is necessary to serve our legitimate interest.

### ***Communication and Marketing***

We use the data we collect 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 about new products or services, upcoming events, security or software updates, update you on a support issue, invite you to take part in a survey, or inform you of special offers. This processing is necessary to serve our legitimate interest.

We also use cookies and similar technologies. For information about managing email subscriptions and promotional communications, please see:

- Your Rights
- Your Communication and Marketing Preferences

### **How We May Share Personal Information**

WCCTV will only share your data for the purpose of performance of a contract.

We only share your personal data to provide a service you have requested or authorised, and only with third parties working on our behalf for the purposes described in your contract.

Specifically, 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.

For questions about third-party vendors, please send an email to [privacy@wcctv.com](mailto:privacy@wcctv.com).

### **Security, Storage and Retention of Personal Information**

#### **Security**

WCCTV has a firm commitment to the security of 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 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 information, 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 compromised.

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

If you have any questions about the security of your personal information, you can contact us at [privacy@wcctv.com](mailto:privacy@wcctv.com).

## Storage

Personal data collected by WCCTV may be stored and processed in the United Kingdom, in the United States, or in any other country where WCCTV or its subsidiaries or service providers are located or maintain facilities. WCCTV has put in place adequate mechanisms to protect personal information when it is transferred internationally, for example by using the Standard Contractual Clauses as approved by the European Commission.

## Retention

WCCTV will retain your personal information 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.

All personal information we retain will be subject to this Statement and our internal retention guidelines. If you have a question about a specific retention period for certain types of personal information we process about you, please send an email to [privacy@wcctv.com](mailto:privacy@wcctv.com).

## Your Rights

We want you to be in control of how your personal information is used by us. Subject to English law you can do this in the following ways:

- you can ask us for a copy of the personal information we hold about you;
- you can inform us of any changes to your personal information, or if you want us to correct any of the personal information we hold about you;
- in certain situations, you can ask us to erase, block or restrict the personal information we hold about you, or object to particular ways in which we are using your personal information; and
- in certain situations, you can also ask us to send the personal information you have given us to a third party.

Where we process your personal information based on legitimate interest you have the right to object at any time to that use of your personal information.

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

We will respond to your request within 30 days.

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 information. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to file a complaint with the UK data protection authority (ICO).

## 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](mailto: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.

## **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.

### **Cookies**

A cookie is a small data file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognise your browser. The length of time a cookie will stay on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. WCCTV uses both types of cookies.

Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your computer or mobile device until they expire or are deleted. We use the following types of cookies on our website.

- **Strictly necessary cookies.** These cookies are essential for you to browse our website and use its features.

- **Performance cookies.** These cookies collect information about how you use our websites. This data may be used to help optimise our website and make it easier for you to navigate.

- **Functional cookies.** These cookies allow our websites to remember choices you make while browsing and personalise your experience. We may store your geographic location in a cookie for instance, to ensure that we show you the website relevant to your area.

- **Analytics cookies.** We use analytics cookies, like those offered by Google Analytics, to help us understand things like how long a visitor stays on our website, what pages they find most useful, and how they arrived at [wcctv.co.uk](https://www.wcctv.co.uk) or [wcctv.com](https://www.wcctv.com). To learn more about Google Analytics and your data,

visit this Google webpage - <https://support.google.com/analytics/answer/6004245>

- **IP address tracking.** WCCTV uses a number of IP tracking tools on its website to measure performance and inform strategic business decisions. These tools include Lead Forensics and Hotjar.

To find out more about these tools, and how they comply with GDPR regulations, visit the following links: Lead Forensics: <https://blog.leadforensics.com/how-lead-forensics-complies-with-gdpr> Hotjar: <https://www.hotjar.com/legal/compliance/gdpr-commitment>

### **How to control Cookie Settings**

Most web browsers allow you to control cookies through their settings preferences. However, if you limit the ability of websites to set cookies, you may impair your overall user experience, as it will no longer be personalised to you. Some browsers offer a "Do Not Track" ("DNT") signal where you can indicate your preference regarding tracking and cross-site tracking. Although we do not currently employ technology that recognises DNT signals, we will only process your personal data in accordance with this Statement.

### **How to Contact us**

If you have any questions about the use of your personal information, please email [privacy@wcctv.com](mailto:privacy@wcctv.com). Unless otherwise stated, WCCTV is a data processor. Our address is Charles Babbage House, Kingsway Business Park, Rochdale, Lancashire, OL16 4NW.

## **Changes to Our Privacy Statement**

WCCTV may modify or update this Statement when necessary, to reflect customer feedback and changes in our products and services. We encourage you to regularly review this Statement to learn more how WCCTV is using and protecting your information.