

## **SHADOW SURVEILLANCE PRIVACY AND COOKIES POLICY**

Shadow Surveillance & Security Services Limited is committed to protecting and respecting your privacy whenever and wherever possible. The policy as laid out below (along with our 'General Terms and Conditions' and any other documents referred to on our sites or published literature) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to fully understand our views and best working practices regarding the handling of your personal data. Please note that for the purpose of the Data Protection Act 1998 (the Act) and the new GDPR, we are referred to as the '*data controller*', and where it states 'We' or the 'Company' relates to Shadow Surveillance & Security Services Limited, and covers our website domains, being [shadowsurveillance.co.uk](http://shadowsurveillance.co.uk).

Please note that from 25 May 2018 the new GDPR (General Data Protection Regulations) come into force. Changes that affect the current regulations have been added/amended within this document, on our General Terms and Conditions, and other locations where it has been deemed necessary. For a copy of our Data Protection Policy please contact us direct on [info@shadowsurveillance.co.uk](mailto:info@shadowsurveillance.co.uk)

### **WHAT IS THE GDPR AND HOW DOES IT AFFECT YOU, THE CUSTOMER?**

The GDPR will give the customer more control over how organizations, such as ourselves, use your personal information, or data. It aims to create identical data privacy laws across all EU countries, which will remain in force as UK Law after the UK leaves the EU. The GDPR says that customers need to actively opt in when providing personal information, and such customers will be able to request information about how the Company might be using their data, what data it collects, and why.

The GDPR applies to all personal data. That means any information that could identify a living person, directly or indirectly. This could include their name, addresses and / or location or their phone number. Some personal information is classed as sensitive by the GDPR, and needs more protection, but please note that 'We' do not collect such sensitive data, and only maintain the basic data, as listed above, in line with the law and current regulations.

### **INFORMATION WE MAY COLLECT FROM YOU**

While using our Site, We may ask you to voluntarily provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to your name, address, email address, and telephone number.

'We' may collect and process the following data about you:

- Information that you provide by filling in enquiry or booking forms on one of our sites. This includes information provided at the time of registering to use our site, subscribing to our services or requesting further services. We may also ask you for information when you report a problem with our site;
- Information and correspondence between yourself and us, in relation to enquiries, site visits, quotations, contracting and general information;
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access (please see below section on Cookies);
- Information that you provide to us or that we ascertain during a visit to one of your sites / properties / businesses in line with your requirements for the services we provide (whether at the quote / contacting stage).

### **WHAT INFORMATION DO WE MAINTAIN**

Information collected may include Names, Locations (including addresses with postcode), Contact Telephone or Email details, as well as preference details (such as previous services provided by the Company, recommendations, specific requirements, and security details such as passwords or codes as required for the service provided, etc...). Such information may be collected on our behalf by third party organizations (such as referral sites). We do not request or store any 'sensitive' or financial data.

### **TELEPHONE MEASUREMENT**

We may, in some instances, use measurement numbers on our Site. This is solely to understand the performance of the Site. This data is only recorded when you voluntarily choose to call the telephone number listed on our Site. The data that we record is the time, date, duration of the phone call and the telephone number that called our business.

The actual phone call conversation is not recorded. The data recorded is logged within a password protected area that also includes an SSL Certificate (Secure Sockets Layer).

#### LOG DATA

Like many site operators, we collect information that your browser sends whenever you visit our Site ("Log Data"). We use third-party services such as Google Analytics and AW Stats, to collect standard internet log information and details of visitor behaviour patterns. This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

Other than the above, at this time, we do not attempt to identify visitors to our Site or contact them using this data. We have no plans to do so in the foreseeable future. You will be kept informed of any change to this situation.

User and Event Data Retention within Google Analytics - Google Analytics will retain data for a given timescale before automatically deleting it. These timescales can vary between 14 months, 26 months, 38 months, 50 months or can be set to never automatically expire. The data retention period is automatically set as 26 months, unless otherwise specified. When data reaches the end of the retention period specified, it is deleted automatically on a monthly basis. We may or may not set retention periods so that they can be reset on new activity. This means that the data retention period would be reset from the date of re-entry as a User to the Site. If you, as the User, do not initiate a new session before the retention period expires, then your data will be deleted.

Site Visitor Recording via Hotjar - We may, in some instances, use Hotjar in order to better understand our Users' needs and to optimise this service and experience. Hotjar is a technology service that helps us better understand our Users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses Cookies and other technologies to collect data on our users' behaviour and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor We will ever use this information to identify individual users or to match it with further data on an individual user. For further details, please see Hotjar's privacy policy by visiting their website <https://www.hotjar.com/>

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by visiting <https://www.hotjar.com/legal/compliance/opt-out>

#### COOKIES

Created by certain websites when you visit them, a Cookie is a small data file containing information about your visit and preferences on the website, and stored on your hard drive. Those help us to offer you a better consultation of our website and to enhance its performances. The Cookies cannot obtain personal information from your hard drive or other Cookies. We (and our website management provider) use a visitor tracking software and Cookies as follows:

**Strictly Necessary Cookies.** These are Cookies that are required for the operation of our website. They include, for example, Cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

**Analytical / Performance Cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality Cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting Cookies.** These Cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use Cookies, over which we have no control. These Cookies are likely to be analytical/performance Cookies or targeting Cookies.

You can refuse Cookies by clicking on the pop up link when first visiting our site, or by modifying the settings of your browser. However, if you do so, the navigation of our website may be slower, but the navigation will not be affected otherwise.

We only utilize essential Cookies which have no set expiry date, however if, in the future, we use other Cookies these will be set to expire after 12 months.

The GDPR regulations do not make much mention of Cookies, and there is already EU legislation in respect to Cookies that was introduced in 2011. In brief, if a Cookie can be used to identify an individual then they should have provided explicit consent for it to be used, however the tools 'We' (and our website management provider) utilize, use *anonymized* data and are therefore unaffected by GDPR.

#### WHERE IS YOUR PERSONAL DATA STORED?

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

#### SSL CERTIFICATE (SECURE SOCKETS LAYER)

Our website is protected using an SSL Certificate (Secure Sockets Layer). This is the standard security technology that establishes an encrypted link between a web server and a browser. This link ensures that all data passed between the web server and browsers remain private and integral.

#### SECURITY

The security of your Personal Information is important to us, but remember no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

Where we have given you (or where you have chosen) a password or access code which enables you to access certain parts of our site, you are responsible for keeping this password or access code confidential. We ask you not to share a password or access code with anyone. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

#### USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner for you and for your computer;
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- To carry out our obligations arising from any contracts entered into between you and us;
- To notify you about changes to our service.

We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post or telephone. If you are an existing customer, we will only contact you by electronic means with information about services similar to those which were the subject of a previous sale to you. If you are a new customer, and where we permit selected third parties to use your data, We (or they) will contact you by electronic means only if you have consented to this.

If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please ensure you do not choose the 'opt-in' section on relevant documentation / online forms. Alternatively you can opt-out at any time, having originally opted-in, by clicking the link on such emails to unsubscribe. Alternatively, to have yourself removed from such databases, please contact us directly on [info@shadowssurveillance.co.uk](mailto:info@shadowssurveillance.co.uk)

## DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information internally as defined in section 1159 of the UK Companies Act 2006. We may disclose your personal information to third parties:

- 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;
- If any one of our businesses or parts of our business assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our General Terms and Conditions, our terms and conditions of supply and other agreements; or to protect the rights, property, or safety of our businesses, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

## WHAT ARE YOUR RIGHTS?

You have the right to ask us not to process your personal data for marketing purposes. We will always inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing, at any time, by contacting us at [info@shadowsurveillance.co.uk](mailto:info@shadowsurveillance.co.uk). For current clients, if you request to have all or part of your stored data removed from our systems, it can affect the service provided to you and this will be highlighted to you at the time to ensure you are able to make an informed decision.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act and GDPR, and is free of charge. This includes data we hold about you, how it is collected, why it is stored and the right to remove your data, which can include asking for data to be corrected if it is not accurate.

## THE RIGHT TO BE FORGOTTEN

People can also ask for their personal data to be deleted at any time – if it's no longer relevant. This is known as the right to be forgotten. Please note this will only apply to data collected that is not required to be maintained by alternative current laws, such as but not limited to requirements for HMRC data for financial transactions.

## CHANGES TO OUR PRIVACY POLICY

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

## CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [info@shadowsurveillance.co.uk](mailto:info@shadowsurveillance.co.uk)