

GDPR Privacy Policy For Customer, Resident, Tenant

Jan Cook

Jan..cook@vericonsystems.com

BACKGROUND:

Vericon Systems Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our Customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1 Information About Us

Vericon Systems Limited is a Limited Company registered in England under company number 11335741, whose registered address is Unit 5, Churchill Industrial Estate, Churchill Road, Cheltenham, Gloucestershire, GL53 7EG.

You can contact Vericon's Data Protection Officer by writing to The Data Protection Officer, Vericon Systems Limited, Unit 5 Churchill Industrial Estate, Churchill Road, Cheltenham, GL53 7EG.

2 What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3 What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

DOCUMENT TITLE: GDPR PRIVACY POLICY	REVISION: V1.0	PAGE 1 OF 8
	ISSUE DATE: 06/11/2018	REVIEW DATE:
DOCUMENT REF: POL_PUB_00062	OWNER: B. COOK	AUTHOR: J. COOK



4 What Are My Rights?

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. However, we would welcome the opportunity to resolve your

DOCUMENT TITLE: GDPR PRIVACY POLICY	REVISION: V1.0	PAGE 2 OF 8
	ISSUE DATE: 06/11/2018	REVIEW DATE:
DOCUMENT REF: POL_PUB_00062	OWNER: B. COOK	AUTHOR: J. COOK



concerns ourselves; please contact us first, using the details in Part 11.

5 What Personal Data Do You Collect and How?

Depending upon your use of our services, we may collect and hold some or all of the personal and non-personal data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data, personal data relating to children or data relating to criminal convictions and/or offences.

You are not required to provide any of the personal information described below to us. If you do not wish to supply such information, you may not be able to use our products and services, or their functionality maybe reduced.

Data Collected	How We Collect the Data
Identity Information/ Contact Information including name, email address, telephone number and addresses associated with your account.	Directly from you, for example when you connect to the VS:Connect portal, website or any Vericon app, when you complete any documentation for us, contact us by phone, email or communicate with us directly in some other way.
Records of discussions with any service engineer and our customer support teams. We will keep records of your comments and opinions shared with us, any questions or if you make a complaint. This may include telephone conversations, emails, any in-app messaging feature or any contact made via our website or any social media platform.	Installation and maintenance engineers will provide us with information about the installation and any maintenance and/or services of our products in your property. Customer support teams will supply information regarding any correspondence you may have with our staff. We may also obtain such information directly from you, via our website, phone, email or other communication methods.

6 How Do You Use My Personal Data?

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we may use your

DOCUMENT TITLE: GDPR PRIVACY POLICY	REVISION: V1.0	PAGE 3 OF 8
	ISSUE DATE: 06/11/2018	REVIEW DATE:
DOCUMENT REF: POL_PUB_00062	OWNER: B. COOK	AUTHOR: J. COOK



personal data, and our lawful bases for doing so:

What We Do	What Personal Data We Use	Our Lawful Basis for processing
Administering our business.	All personal information we collect.	For the legitimate interest of operating our business.
Supplying our products and/or services to you.	All personal information we collect.	Necessary for the performance of a contract.
Personalising and tailoring our products and/or services for you.	All personal information we collect.	Necessary for the performance of a contract. Also for creating the best product and service experience for you.
Communicating with you.	All personal information we collect.	Necessary for the performance of a contract.
For the establishment, exercise or defence of legal claims.	All personal information we collect.	For the legitimate interest of operating our business.

We use the following automated systems for carrying out certain kinds of decision-making and profiling. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the Data Protection Legislation gives you the right to do so. Please contact us to find out more using the details in Part 11.

- The following automated decision-making method(s) may be used:
 - The creation and usage of algorithms, a sequence of instructions or set of rules, designed to complete a task. e.g; to maintain a boiler in your property, we will use algorithms to assess whether your boiler has incurred a fault and requires an

DOCUMENT TITLE: GDPR PRIVACY POLICY	REVISION: V1.0	PAGE 4 OF 8
	ISSUE DATE: 06/11/2018	REVIEW DATE:
DOCUMENT REF: POL_PUB_00062	OWNER: B. COOK	AUTHOR: J. COOK



engineer's visit and send a notification to you and/or your landlord.

- The following automated profiling may take place:
 - The collection and analysis of personal data using algorithms and machine learning. This data enables the functionality of our devices in your property.
 - The identification of correlations between device data to improve the user experience, e.g. we may identify that a fault on your boiler was caused by a failed boiler sensor. We may also identify that another user with the same make, model and age of boiler has experienced the same fault. We can then identify other property owners with the same make, model and age of boiler and suggest preventative maintenance. This improves the experience for all users.

We will only use your personal data for the purpose(s) for which it was originally collected unless we reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If we do use your personal data in this way and you wish us to explain how the new purpose is compatible with the original, please contact us using the details in Part 11.

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

7 How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

We will keep your personal information for as long as you have an account with us.

Where you are subject to a service plan with us, we will keep your personal data for the duration of time set out in your service plan.

After you close your account with us, we will keep your personal information for a reasonable period to maintain our records and legal obligations to you.

For any audio and video recordings, we will keep your recordings for the period of time set out in your service plan with us. We will delete your recordings promptly after this period ends.

DOCUMENT TITLE: GDPR PRIVACY POLICY	REVISION: V1.0	PAGE 5 OF 8
	ISSUE DATE: 06/11/2018	REVIEW DATE:
DOCUMENT REF: POL_PUB_00062	OWNER: B. COOK	AUTHOR: J. COOK



8 How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the Data Protection Legislation, GDPR, and/or to equivalent standards by law.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- ensure that appropriate security safeguards and virus protection are in place to protect the hardware and software which is used in processing the Personal Data in accordance with best industry practice;
- prevent unauthorised access to the Personal Data;
- protect the Personal Data using pseudonymisation, where it is practical to do so;
- ensure that its storage of Personal Data conforms with best industry practice such that the media on which Personal Data is recorded (including paper records and records stored electronically) are stored in secure locations and access by personnel to Personal Data is strictly monitored and controlled;
- have secure methods in place for the transfer of Personal Data whether in physical form (for example, by using couriers rather than post) or electronic form (for example, by using industry standard encryption, such as AES-256 encryption);
- password protect all computers and other devices on which Personal Data is stored, ensuring that all passwords are secure and that passwords are not shared under any circumstances;
- take reasonable steps to ensure the reliability of personnel who have access to the Personal Data;
- have in place methods for detecting and dealing with breaches of security (including loss, damage, or destruction of Personal Data) including:
 - the ability to identify which individuals have worked with specific Personal Data;
 - having a proper procedure in place for investigating and remedying breaches of the GDPR; and
 - notifying the Data Controller as soon as any such security breach occurs.
- have a secure procedure for backing up all electronic Personal Data and storing back-ups separately from originals;

DOCUMENT TITLE: GDPR PRIVACY POLICY	REVISION: V1.0	PAGE 6 OF 8
	ISSUE DATE: 06/11/2018	REVIEW DATE:
DOCUMENT REF: POL_PUB_00062	OWNER: B. COOK	AUTHOR: J. COOK



- have a secure method of disposal of unwanted Personal Data including for back-ups, disks, print-outs, and redundant equipment; and

9 Do You Share My Personal Data?

We will not share your personal data outside of Vericon or the related group of companies

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10 How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within twenty-one days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11 How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of The Data Protection Officer):

Email address: dpo@vericonsystems.com

Telephone number: 01242 582555.

DOCUMENT TITLE: GDPR PRIVACY POLICY	REVISION: V1.0	PAGE 7 OF 8
	ISSUE DATE: 06/11/2018	REVIEW DATE:
DOCUMENT REF: POL_PUB_00062	OWNER: B. COOK	AUTHOR: J. COOK



Postal Address: Unit 5, Churchill Industrial Estate, Churchill Road,
Cheltenham, Gloucestershire, GL53 7EG, United Kingdom.

12 Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website, www.vericonsystems.com. This Privacy Notice was last updated November 2018.

13 Jurisdiction

This agreement shall be governed by English law and subject to the exclusive jurisdiction of the English courts.

DOCUMENT TITLE: GDPR PRIVACY POLICY	REVISION: V1.0	PAGE 8 OF 8
	ISSUE DATE: 06/11/2018	REVIEW DATE:
DOCUMENT REF: POL_PUB_00062	OWNER: B. COOK	AUTHOR: J. COOK

