

## PRIVACY POLICY

Last Updated: 03/10/2019

### Introduction

By accessing the TacticsON App and Web Portal you authorise us to collect, store, access, transfer and use your information as described in this policy. We may make changes to this policy in future, which will be posted here. You should check this page from time to time to ensure you are aware of any changes. Where appropriate we may notify you of changes by email or through the App.

We only access and use your personal data collected through the App in accordance with the instructions of our Client and this privacy policy. We do not use personal data of specific individuals collected through the App which has not been aggregated or anonymised other than for the purpose of fulfilling our obligations to our Client and in response to the instructions of the authorised personnel of our Client.

### The Data Controller

For the purposes of the Data Protection Act 1998, the ‘data controller’ (i.e. the company who is responsible for, and controls the processing of, your personal data) in respect of personal data collected through the App will be our Client and we process that personal data in accordance with our Client’s instructions.

Our Client is required to have its own privacy policy to explain how it collects, stores, uses and shares your personal data, and you should ask our Client for a copy to review to ensure you are happy with it before using the App.

Where we decide the purpose or manner in which your personal data is processed, for example if we collect aggregate or anonymous analytics data about users to help improve the App or if you get in touch with us with a technical or other query directly rather than through our Client, then the data controller (or the joint data controller with our Client) is International Corporate Protection Group Limited, a company incorporated in England with registered company number 05108577 and registered office address Level 30, The Leadenhall Building, 122 Leadenhall Street, London, United Kingdom, EC3V 4AB.

### 1. PERSONAL DATA WE MAY COLLECT ABOUT YOU

#### 1.1. Data you supply (“Submitted Information”) includes:

- 1.1.1. We will obtain personal data about you (such as your employee identifier and location) whenever you contact us, register an account with us, submit material through a form, or via a service, in our App or otherwise.
- 1.1.2. We may also obtain sensitive personal data about you if you voluntarily supply it through our App. If you volunteer such information, you will be consenting to our processing it for the purpose explained to you when you supply it.

#### 1.2. Data we collect includes:

- 1.2.1. We may monitor your use of our App Sites through the use of cookies and similar tracking technologies. For example, we may monitor how many times you use it, traffic data, your IP and MAC address, a unique device identifier, the browsers and devices you use to access our App, your internet service provider, and the actions you take when using our App (“Analytics”). Our Client requires us to collect Analytics so we can keep our Client informed of, and react to security and other metrics promptly.
- 1.2.2. Our App may also collect information which you make available to us and which is stored on your device, including contact information (“Content Information”). As mentioned below, Content Information may be used to help you specify contacts who

you would to notify when you take certain actions through the App, provided that you configure those contacts as recipients in the settings of the App.

1.2.3. When you install, uninstall or update our App, a unique application number and information about your installation, for example, the type of operating system, may be sent to us.

1.2.4. The App keeps track of the actual physical location of our users by collecting GPS and Wi-Fi network information from your devices (“Location Information”) only during those periods when the relevant user has activated the tracking function of the App.

## 2. HOW WE USE YOUR PERSONAL DATA

2.1. We will use your personal data for the purposes described to you at the time your data was obtained, and for the following purposes, subject always to the privacy and sharing settings you configure through the App:

2.1.1. Submitted Information: to help us identify you and to open, run and monitor any accounts you hold with us; administration; to process your enquiries; to monitor any material you contribute through our App; to send you information about our App; to set up your profile on the App; to enable you to send messages to either the our Client’s Command Centre or to other individuals where you have specified them as recipients of certain notifications such as through the Panic or Check-In buttons.

2.1.2. Analytics: to understand how, and how often, users make use of our App, and to help us improve it and monitor the security and performance of the App and our infrastructure so we might comply with our obligations to keep our Client informed and react to threats where necessary.

2.1.3. Content Information: to set up your profile on the App; to enable you to send messages to our Client’s Command Centre or to other individuals you have specified as recipients of certain notifications through the App settings.

2.1.4. Location Information: to monitor your location and where requested by you to share it with the our Client’s personnel through our Client’s Command Centre when you activate location tracking through the App, or to other individuals who you have configured as recipients through the App for functions such as Check-Ins or the Panic button.

2.2. We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined. We will only use information collected about you in accordance with the Data Protection Act 1998 and in accordance with the instructions of the data controller.

## 3. DISCLOSURE OF YOUR INFORMATION

3.1. We may disclose some or all of the data we collect from you when you download or use the App.

3.2. ALL OF THE INFORMATION SUPPLIED BY YOU AND OTHERWISE COLLECTED BY OUR APP WILL BE ACCESSIBLE TO OUR CLIENT (SAVE WHERE YOU HAVE CONFIGURED THE APP NOT TO SHARE SUCH INFORMATION, FOR EXAMPLE YOUR LOCATION WILL ONLY BE SHARED WITH THE OUR CLIENT’S COMMAND CENTRE IF YOU HAVE ACTIVATED THAT FUNCTION). YOU SHOULD CONFIRM WITH OUR CLIENT HOW SUCH INFORMATION WILL BE USED, STORED, SHARED OR DISCLOSED BEFORE USING THE APP.

3.3. Otherwise, we only disclose your personal data in the following ways:

Category of data	Recipient and Purpose
Submitted Information and Content Information	We share your contact information with the our Client's Command Centre and those individuals you specify through the App, and in each case only where you instruct us to do so, such as by using messaging, SupportME., check-in, panic or other functionality of the App.
Content Information, Analytics and Submitted Information	Our App collects information about the way you use it, such as by monitoring traffic data, your IP and MAC address, a unique device identifier, the browsers and devices you use to access our App, your internet service provider, and the actions you take when using our App. We only use this data to improve our App and monitor the security and performance of our App and infrastructure so we are able to share such information with our Client as we are required to do by our Client in order to keep our Client informed of and to respond to threats.
Location Information	<p>Location Information is shared:</p> <ul style="list-style-type: none"> <li>• our Client's Command Centre whenever the tracking function of the App is activated by you;</li> <li>• if you check-in through the App or use other functionality which indicates an intention to share your location such as the Panic button, then your location may be shared with our Client's Command Centre and those individuals you have specified as recipients of such notifications through the App.</li> </ul>

3.4. We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

3.5. We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.

#### 4. WHERE AND HOW LONG WE STORE YOUR PERSONAL DATA

4.1. The data 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 our Client or our suppliers. These staff may be engaged in the support of our Client’s policies and procedures, the fulfilment of your requests, and the provision of technical support services. By submitting your personal data, you agree to this transfer, storing or processing.

4.2. Where we have given you (or where you have chosen) a password that enables you to access certain parts of the App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

4.3. We retain historic data for reporting and auditing purposes for a period of up to 6 months, following which we take steps to delete that data, insofar as is practicable in light of technical limitations and back-up procedures which may be implemented from time to time including in accordance with the instructions of our Client.

#### 5. YOUR RIGHTS

5.1. If you believe we have information about you that you do not want us to have or that is incorrect please contact us as at [support@tacticson.com](mailto:support@tacticson.com) and we shall correct or remove the data as you request as soon as reasonably practicable. If you would like to receive a copy of the information we have about you, please note that an administration fee of £10 may be applicable. Where such a request relates to personal data in respect of which the data controller is a third party, we will promptly forward your request to the relevant data controller.

#### 6. EXTERNAL WEBSITES

6.1. If you follow a link from our App to our Client or any third party websites or services, please note that we do not accept any responsibility or liability for the collection, storage or use of personal data by those third parties, and you should check the applicable privacy policies before you submit any personal data to those websites or use these services.

#### 7. COOKIES

7.1. A cookie is a text file placed onto your device when you access our Apps or Sites. We use cookies and other online tracking devices such as web beacons, and flash object storage to deliver, improve and monitor the website application used by our Client’s personnel, including in the following ways:

Authentication	To log you in and keep you logged in.
Preferences	To remember information about you such as your preferred language and configuration.

Analytics	To alert us to problems such as if the App becomes unavailable, and help us understand how authorised users make use of the App, and how often, so we can improve it to deliver a better experience for our users.
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- 7.2. The information we obtain from our use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally.
- 7.3. Please note that, if you choose to disable cookies or similar technologies on your device, you may be unable to make full use of the App.