INTRODUCTION – Version 1.0 June 2019

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you interact with us as one of our customers or suppliers (or as an employee or representative of same), visit our premises, visit or use our websites (regardless of where you visit them from) (our websites), or download/use our browser or mobile based Fire safety management platform, known as TFS-COMPLIANCE™ (the Cloud Software and the App respectively, and together the Software).

Before using the Software, you must have indicated your consent to the terms of this notice. As a user of our App, you will also have consented to the terms of our separate end-user licence agreement.

This notice also informs you how we will look after your personal data when, and about your privacy rights and how the law protects you. It does not cover any third party website you have used to access our websites or Software or any third party websites that you access from them.

It is important that you read this notice so that you are fully aware of how and why we are using your data.

1. WHO WE ARE

Under the General Data Protection Regulation (GDPR) and other relevant data protection legislation, we act as a data controller (make decisions) in relation to any of your personal data that we collect.

If you have any questions about this notice, including any requests to exercise any of your legal rights, please contact us using the details set out below.

Contact Details

Our full details are:

Joule Group is made up of different legal entities, details of which can be found here www.jouledigitalsolutions.com/tfscompliance/commercial-software-licence-terms. When we mention "we" “us” or “our” in this notice, we are referring to the relevant

company in the Joule Group responsible for processing your data which will be clear to you when you deal with such company.
For the purposes of use of our Software, Joule Digital Solutions Limited is the responsible controller.

Full Name of Legal Entity: Joule Digital Solutions Limited, a company incorporated in England under company number 11989911, with registered office address at 158 (2nd Floor) Buckingham Palace Road, London, SW1W 9TR
Email Address: info@joulegroup.com
Postal Address: The City Factory, 100 Patrick Street, L'Derry. Northern Ireland, BT48 7EL
ICO Registration Number: 00011898369

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk), or other competent supervisory authority of an EU member state if the Software is downloaded or our websites accessed outside the UK. We would appreciate the chance to deal with your concerns before you approach such bodies so would ask that you please contact us in the first instance.

Changes to this Notice and your Duty to Inform us of Changes

We keep this notice under regular review. It may change and if it does, these changes will be posted on this page and, where you use our Software, notified to you via the Software platform when you next log on or access same, or otherwise notified to you by email. In respect of users of our Software, you will likely be required to read and accept the changes to continue your use of the Software.

This version one of this notice was last updated on 4 June 2019 and historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-Party Links

Our websites and Software may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as set out below.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. Where you have registered to use our websites you can update your details or delete your account at any time.

DATA THAT YOU SUPPLY TO US

• General Personal Data - This is personal information about you that you share with us by online forms on our website, through email, through the post, on the telephone, when you use register to use the Software, or by any other means.

It also includes information you provide when you subscribe to any of our services, search for our App, or report any technical or service issues in relation to our websites or Software, including notes about any issues and how we responded to resolve these.

Typically, when you deal with us you may provide information about yourself, as well as other data about your business, including your full name, job title, billing address, business name, personal and/or business email address, telephone and/or mobile phone number and other contact details. You may provide similar information where you contact us or sign up to our newsletter.

When you sign up to use our Software you will be required to provide your name and email address, alongside other non-personal details.

We do not typically collect or hold your financial details save where you have provided us with these in order to facilitate payments. We are PCI compliant and all financial data is kept secure.

If you provide verbal personal information that you give us consent to use you will have such consent confirmed back to you in writing.

You may also communicate your preferences in receiving marketing from us and our third parties and your communication preferences (including details you provide when you opt-in to receive marketing communications from us).

Where you are sharing personal data that does not directly relate to you (e.g. your representatives that legally act on your behalf), you must ensure you have the consent to do so and have shared this notice with that person/those people, including where you are acting to register other individuals on their behalf.

DATA THAT WE COLLECT

• Telephone Recordings - Telephone conversations may be recorded to improve training, to ensure a high level of consistent customer service, or otherwise as required in our legitimate interests or to process contracts we have with you or your business.

• Technical Data from our Websites - We use certain technical services to gather technical data online whenever you use our websites. You are not personally identifiable from any of the technical data we collect using such services.

• Technical Data from our Software - We also use certain technical services to gather certain technical, device, content and usage data whenever you use our Software, whether as an end-user of the App or a manager of the platform via the Cloud Software. We collect this data using cookies and other similar technologies. Please see our cookie policy at www.jouledigitalsolutions.com/tfscompliance/commercial-software-licence-terms for further details. You will be personally identifiable from any of the data we collect using such services, as it will be tied to your specific user account.

The above technical data is used to distinguish you from other users of the Software, our websites and App distribution platforms, and to remember your preferences. It also helps us to provide you with an optimal experience when you use the Software or browse our websites.

INFORMATION WE RECEIVE FROM THIRD-PARTIES

• Device Data - Information about the device from which you access our Software, via analytics providers such as Google based outside the EU.

• Social Media - Where you have responded to a promotional item or offer from us through social media facilities such as Facebook (if applicable), we may receive profile information about you which can include your name, address, telephone number(s) and/or your business contact details. This information would be used to respond to your interest, to fulfil a request from you and/or to send you future information and offers, where you have given clear consent to do so.

• Publicly Available Information - We may collect personal information about you from publicly available sources. This can include your name, address and other publicly available information. As far as passible, we ensure that where any third-parties are involved in suppling such information, that they are compliant to do so. This may include credit reference agencies such as Experian, public registers such as the Companies House registry or the Electoral Register.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (including details about your race or ethnicity, religious or philosophical beliefs, medical information, sex life, sexual orientation, political opinions, trade union membership, genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

• Where we need to perform the contract we are about to enter into or have entered into with you, to keep internal records for administration purposes related to such contracts, for the purposes contemplated in any separate terms of use for our websites that you have entered into, including for the purposes set out in the “Our Standard Business Operations” section below.
• Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
• Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other as set out below in relation to marketing.

We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data.

Our Standard Business Operations:

• To provide the services that we contract to do so with you, or with your employer or contractor to whom we have licensed the Cloud Software and who has authorized you to download and use the App;
• To provide you with information that you request from us;
• To confirm your identity as a natural living person; and
• As part of our billing, payments and recovery processes.

We may also use contact information to notify you of any office closure, and how you may contact us should an emergency arise during the closure period.

Marketing

We may use your data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will only receive marketing communications from us if you have opted to receive them. This includes where you have consented to being contacted by us by email or telephone. You can opt in over the phone, by email, or online.

We strive to provide you with choices regarding personal data uses for marketing and advertising and currently use to manage our email correspondence. You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us, as appropriate, at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service purchase or other transactions.

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Legal Requirements

We will keep and use your data in terms of any legal or regulatory requirements that we have and can use your data to protect our legal position, if legal action is required, including the recovery of any outstanding debts.

By way of further example, we will share your personal data with the relevant agencies and without notice, where we are requested to or suspect fraudulent activities, money laundering, terrorist related activities.

Children

Our websites are not intended to be used by children under 13 years old. We will never knowingly collect data from children below 13 years old. If you become aware of such a child (or another person) supplying data to us, please contact us.

Please note that we may collect data on children aged under 13 years of age from their parents or guardians where this is relevant for the purposes of the products or services that are being requested by such parents or guardians (for example, names and dates of birth of dependent children for the purposes of protection or assurance products).

We will take care when processing such data and only do so where one of the legal grounds set out above applies.

4. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the categories of data processors or data controllers set out below for the purposes set out in in paragraph 3 above or otherwise below:

• with your employer or the other person by whom you have been authorised to download and use the Software, who can access all information you input, store or process using the Software;
• with HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances;
• with third party purchasers, if we buy, sell or merge any business or assets of our business and are required to share data as part of the buying, selling or merger agreement. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice;
• with third party purchasers, if our assets are acquired by a third-party, and data is transferred as part of the purchased assets;
• with professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the European Union or United Kingdom who provide consultancy, banking, legal, insurance and accounting services, where they have a need to know same for any of the purposes set out above;
• with reputable and trusted third-parties where we have asked them to contact you on our behalf, where you have given us consent, it is part of our contractual

agreement, is a legal requirement or there is clear legitimate interest between us (these services may include sending you email, calling you by telephone, sending you information through the post etc.);
• with specific selected third parties, determined by us, if you breach any agreement with us, including so as to enforce our rights against you, including credit-reference agencies, debt-collection firms or service providers, solicitors or barristers and law enforcement agencies (if applicable);
• with service providers acting as processors based in the European Union or United Kingdom who provide IT and system administration services, as set out below:

o with email marketing services i.e. Mailchimp to send marketing emails where you have opted in to receiving them. You can unsubscribe directly from any mailing list using the unsubscribe links provided within emails;
o with our customer relationship management software provider, which stores all customer details (these are held on a secure server only accessible with an authorised username and password);
o with analytical service providers in order to analyse our website' traffic to improve products and services; and
o with processors offering software tools, or EU or UK based external servers (including externally provided original and backup servers), that are used to store personal information provided by you on our behalf (our current servers are maintained by Sugar Rush Creative, whose privacy policies are available at https://sugarrushcreative.com/sugar-rush-privacy-policy.pdf.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process the minimal personal data required for the specified purposes and in accordance with our instructions.

Third-party Marketing

We will get your express opt-in consent before we share your personal data with any company outside of our own for marketing purposes.

5. INTERNATIONAL TRANSFERS

The data you provide to us will be securely stored and backed up within the EEA and/or the UK. We do not transfer your personal data outside the EEA and/or the UK.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will collect and store personal data on any device from which you access our App using application data caches and browser web storage (including HTML5) and other technology.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. We cannot guarantee the security of your data transmitted to our website, and before it reaches us, such data is transmitted at your own risk.

7. DATA RETENTION

How long will you use my Personal Data for?

We will only retain your personal data 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 data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We will keep your data for the term you have consented to, the contracted term between us where there is a legitimate interest for us to remain in contact with you, or for the legally required period, whichever is the longest.

By law we have to keep basic information about any of our customers (including contact, identity, financial and transaction data) for six years after you cease being a customer for tax purposes. For the purposes of contract administration, we will also store all data as long as the contract you have placed through us endures and for the six year limitation period thereafter in case you raise any claims in relation to any products or services you or your employer or other person by whom you have been authorised to use our Software have purchased from us.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

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

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

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.

Where you exercise one of your rights, we may need to request specific information from you to help us confirm your identity and ensure your right to exercise such 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.

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.

9. LEGAL

Changes to this Notice

We may change this notice from time to time. Any material changes to this notice will be notified to you.

Choice of Law and Jurisdiction

This notice shall be governed by and interpreted in accordance with the laws of Northern Ireland and you irrevocably agree that the courts of Northern Ireland shall have exclusive jurisdiction to settle any dispute which may arise out of, under, or in connection with this notice.