



# Privacy Notice

January 2018 Asset ID Limited Privacy Notice

## WHAT IS PERSONAL DATA?

Personal data is any information that can be used, alone or together with other data, to uniquely identify any living human being, such as your name, or any email addresses or phone numbers related to you personally.

## WHAT PERSONAL DATA DO WE COLLECT AND USE, FOR WHAT PURPOSES AND ON WHAT LEGAL GROUNDS?

If you are an employee of or otherwise represent a company participating in an Asset ID partner program.

We may collect the following personal data about you:

Contact details. Typically, your name, email address(es) and phone number(s).

Employment details. Typically, the name and contact details of your employer and your job title.

Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes: Legal grounds for our collection and use of your personal data:

To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the partnership and/or contract that we have with you/your company. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the partnership with your company.

To provide you with marketing communications, where you have opted in to receive such communications (including information about us, our products, solutions and services, competitions and promotions). These can be shared via electronic means (for example, SMS, emails and online advertising) and via post. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to market, promote and demonstrate our business, products, solutions, services, competitions, events and similar and to provide you and/or your company with relevant product, solution and service offerings and any other information about us and/or our products that you may seek or we think might be of interest to you/your company.



To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer. If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.

If we have a partner agreement with your company, we use your contact details and employment details to execute and maintain, and perform obligations under, this agreement. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to uphold, maintain and administrate the contractual relationship that we have with your company.

We may use your contact details and employment details to check (screen using designated computer software) whether you or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you or your company are on any applicable sanctions lists or based in a country that is subject to an embargo). This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

If you are an employee of or otherwise represent a company to which Asset ID sells or provides products or services.

We may collect the following personal data about you:

Contact details. Typically your name, email address(es) and phone number(s).

Employment details. Typically the name and contact details of your employer and your job title.

Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes: Legal grounds for our collection and use of your personal data:

To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the partnership and/or contract that we have with you/your company. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the business relationship with your company.

To provide you with marketing communications, where you have opted in to receive such communications (including information about us, our products, solutions and services, competitions and promotions). These can be shared via electronic means (for example, SMS, emails and online advertising) and via post. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to market, promote and



demonstrate our business, products, solutions, services, competitions, events and similar and to provide you and/or your company with relevant product, solution and service offerings and any other information about us and/or our products that you may seek or we think might be of interest to you/your company.

To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer. If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.

We use your contact details and employment details to execute and maintain, and perform obligations under the agreement between us and your company. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to uphold, maintain and administrate the contractual relationship that we have with your company.

We may use your contact details and employment details to check (screen using designated computer software) whether you or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you or your company are on any applicable sanctions lists or based in a country that is subject to an embargo). This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

If you are an employee of or otherwise represent a company that supplies products, solutions and/or services to Asset ID.

We may collect the following personal data about you:

Contact details. Typically your name, email address(es) and phone number(s).

Employment details. Typically the name and contact details of your employer and your job title.

Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes: Legal grounds for our collection and use of your personal data:

To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the partnership and/or contract that we have with you/your company. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the business relationship with your company.



To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer. If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.

We use your contact details and employment details to execute and maintain, and perform obligations under the agreement between us and your company. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to uphold, maintain and administrate a contractual relationship that we have with your company.

We may use your contact details and employment details to check (screen using designated computer software) whether you or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you or your company are on any applicable sanctions lists or based in a country that is subject to an embargo). This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

If you, yourself or through a third party, provided Asset ID with your contact details to get general information about us or our products, to explore possible business opportunities, etc. (you may for example have given an Asset ID employee your business card at a trade show or submitted an inquiry through one of our web forms).

We may collect the following personal data about you:

Contact details. Typically your name, email address(es) and phone number(s).

Employment details. Typically the name and contact details of your employer and your job title.

Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes: Legal grounds for our collection and use of your personal data:

To provide you with marketing communications, where you have opted in to receive such communications (including information about us, our products, solutions and services, competitions and promotions). These can be shared via electronic means (for example, SMS, emails and online advertising) and via post. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to market, promote and demonstrate our business, products, solutions, services, competitions, events and similar and to provide you and/or your company with relevant product, solution and service offerings and any other information about us and/or our products that you may seek or we think might be of interest to you/your company.



To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer. If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.

We may use your contact details and employment details to check (screen using designated computer software) whether you or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you or your company are on any applicable sanctions lists or based in a country that is subject to an embargo). This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

If you have registered an Asset ID online account and/or you or your company use features available via that account.

We may collect the following personal data about you:

Contact details. Typically your name, email address(es) and phone number(s).

Employment details. Typically the name and contact details of your employer and your job title.

System data.

Data that we need to grant you access for you to use our different online products, solutions and services, for example IP number and port number.

Billing information.

Details that we requires you to provide if you make a payment (e.g., of a service fee) to us, for example your and your employer's name, your and your company's address(es) and email address(es) and financial information corresponding to your selected method of payment (e.g., your credit card details or bank account number).

Account settings.

Information about various preferences and personal details that you set for your Asset ID online account, for example, communication preferences (e.g., opting in or out of receiving various messages, from us).

Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes: Legal grounds for our collection and use of your personal data:



To create and manage your Asset ID online account as requested by you when registering for your account. This use, including the collection of the personal data needed to do it, is necessary to perform (as applicable), the contract between us and you regarding your use of your Asset ID online account and the service features available through the account, including ensuring that your use of our on-line products is in compliance with applicable terms and conditions for that use.

To the extent you use your Asset ID online account and the service features available through the account on behalf of/as a representative for your company, this use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to perform (as applicable), uphold, maintain and administrate the agreement between us and your company regarding your company's use of your Asset ID online account and the service features available through the account, including ensuring that your company's use of our on-line products is in compliance with applicable terms and conditions for that use.

To grant you access to and give you and/or your company the possibility to use our different online products, solutions and services (in accordance with and subject to the terms and conditions applicable in each case). For example, Asset ID online/hosted services such as Secure Remote Access, software downloads, e-newsletters.

To monitor, for our necessary administrative purposes, your use of our different online products, solutions and services.

In particular, we use your contact details, employment details, system data, billing information and account settings to execute, maintain, and perform obligations under the agreement between us and you or your company regarding your use of your Asset ID online account and the service features available through the account. This use, including the collection of the personal data needed to do it, is necessary to perform (as applicable), the contract between us and you regarding your use of your Asset ID online account and the service features available through the account.

To the extent you use your Asset ID online account and the service features available through the account on behalf of/as a representative for your company, this use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to perform (as applicable), uphold, maintain and administrate the agreement between us and your company regarding your company's use of your Asset ID online account and the service features available through the account.

To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the contract that we have with you/your company. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the business relationship with you or your company.

To provide you with marketing communications, where you have opted in to receive such communications (including information about us, our products, solutions and services, competitions and promotions). These can be shared via electronic means (for example, SMS, emails and online advertising) and via post. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to market, promote and demonstrate our business, products, solutions, services, competitions, events and similar and to provide you and/or your company with relevant product, solution and service offerings and any other information about us and/or our products that you may seek or we think might be of interest to you/your company.

To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer. If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.



We may use your contact details and employment details to check (screen using designated computer software) whether you or your company are barred under any laws or regulations from doing business with us and our group of companies, including but not limited to using our services (for example if you or your company are on any applicable sanctions lists or based in a country that is subject to an embargo). This use, including the collection and use of the personal data needed to do it, is necessary for our compliance with relevant laws and regulations regarding sanctions lists for natural persons and organizations and embargos (legal obligations), that we have to follow. It is also necessary for the purpose of our legitimate interest to ensure that our group companies comply with such legal obligations.

If you visit Asset ID's premises.

We may collect the following personal data about you:

Contact details. Typically your name, email address(es) and phone number(s).

Employment details. Typically the name and contact details of your employer and your job title.

Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

Video, photos and audio material. Video, photos and audio recorded at Asset ID' premises by network video camera and software products under development.

As applicable, we use this personal data for the following purposes: Legal grounds for our collection and use of your personal data:

To keep a record of who is entering and leaving the premises. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to maintain a visitors record and control who is currently visiting the premises.

To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer. If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.

Video, photos and (if specifically stated) audio material is processed in order to test the functionality and features of security camera and software products. The processing is necessary for the purpose of Asset ID' legitimate interest to test the functionality and features of its products, as part of Asset ID' research and development work.

If Asset ID has obtained your consent prior to the recording, the legal ground is that consent.

Video, photos and (if specifically stated) audio material is processed to demonstrate Asset ID' products and technology and to market Asset ID as a company and its business. The processing is necessary for the purpose of Asset ID'





legitimate interest to demonstrate Asset ID' products and technology and to market Asset ID as a company and its business.

If you have entered into a modelling agreement with Asset ID, the legal basis is that the processing is necessary to fulfil the contract with you.

Video material is also processed to maintain security at the Asset ID premises. The processing is necessary for the purpose of Asset ID' legitimate interest in maintaining security at the Asset ID premises.

Asset ID' core business is the development of network video solutions for professional IP video surveillance. As part of the development process, it is of great importance to test the functionality and features of some of our network video camera and software products. We do so by installing products under development at various places at our premises. Asset ID has concluded that such testing activities are necessary for the success of Asset ID' business, and that it brings great value to our research and development work. This means that when visiting Asset ID, and by moving around at our premises, you may take part in the development process of Asset ID' products. Whenever Asset ID is conducting video recordings in such areas, ongoing recordings will be indicated by signs, directing you to this privacy notice.

If not specifically indicated otherwise, Asset ID will only record video and photo material. Audio recordings will be subject to additional information signs and will only be conducted in closed off spaces dedicated for that purpose. You will not be subject to audio recordings unless you choose to enter such clearly marked recording areas.

The material recorded for R&D purposes will never be processed in order to analyze the behaviour or track the pattern of movement of a certain individual (except strictly for R&D purposes) but is limited to the testing and evaluation of features and functionality of the Asset ID products, such as resolution, audio and video compression, operating conditions and audio streaming.

When possible, we will obtain the consent for processing for R&D purposes from all concerned individuals (instead of relying on legitimate interest). In such cases, the legal basis for such processing is the consent of the individual.

In some cases, we may use recordings for marketing purposes. In case we will use these recordings for commercials or printed marketing material, we will obtain the prior approval from you to use such material or enter into a model agreement. The legal basis for our processing will be our legitimate interest to demonstrate Asset ID' products and technology and to market Asset ID as a company and its business. If you have entered into a modelling agreement with Asset ID the legal basis is that the processing is necessary to fulfil the contract.

If you visit any of Asset ID' external recording sites.

We may collect the following personal data about you:

Video, photos and audio material. Video, photos and audio are sometimes recorded outside Asset ID' premises by network video camera and software products under development.





As applicable, we use this personal data for the following purposes: Legal grounds for our collection and use of your personal data:

Video, photos and (if specifically stated) audio material is processed in order to test the functionality and features of Asset ID' network video camera and software products. The processing is necessary for the purpose of Asset ID' legitimate interest to test the functionality and features of its products, as part of Asset ID' research and development work.

If Asset ID has obtained your consent prior to the recording, the legal ground is that consent.

Video, photos and (if specifically stated) audio material is processed to demonstrate Asset ID' products and technology and to market Asset ID as a company and its business. The processing is necessary for the purpose of Asset ID' legitimate interest to demonstrate Asset ID' products and technology and to market Asset ID as a company and its business.

If you have entered into a modelling agreement with Asset ID, the legal basis is that the processing is necessary to fulfil the contract with you.

To be able to test and demonstrate our products and inform about our business we occasionally conduct recordings in publicly accessible areas. We may record you as you pass the recording area. If we can identify you on the recorded material, we have collected personal data about you. Whenever Asset ID is conducting video recordings in such areas, ongoing recordings will be indicated by signs, directing you to this privacy notice.

If not specifically indicated otherwise, Asset ID will only record video and photo material. Audio recordings will be subject to additional information signs and will only be conducted in closed off spaces dedicated for that purpose. You will not be subject to audio recordings unless you choose to enter such clearly marked recording areas.

Video, photos and audio recordings involving identifiable individuals will never be processed in order to analyze the behaviour or track the pattern of movement of a certain individual (except strictly for R&D purposes) but is limited to promotion of the Asset ID products or the testing and evaluation of features and functionality of the Asset ID products, such as resolution, audio and video compression, operating conditions and audio streaming.

If there is no need to include identifiable individuals in the Recorded Material, the Recorded Material will be subject to an anonymization process.

In some cases, we may use recordings for marketing purposes. In case we will use these recordings for commercials or printed marketing material, we will obtain the prior approval from you to use such material or enter into a model agreement. The legal basis for our processing will be our legitimate interest to demonstrate Asset ID' products and technology and to market Asset ID as a company and its business. If you have entered into a modelling agreement with Asset ID the legal basis is that the processing is necessary to fulfil the contract.

If you do not belong to any of the above categories of individuals but you are still an employee of, or otherwise represent, a company or organization that Asset ID has established contact with, for example a member of the press.



We may collect the following personal data about you:

Contact details. Typically your name, email address(es) and phone number(s).

Employment details. Typically the name and contact details of your employer and your job title.

Other data that you intentionally share. Information about you that you voluntarily submit to us in for example free text fields, web forms and other contexts.

As applicable, we use this personal data for the following purposes: Legal grounds for our collection and use of your personal data:

To send 'transactional information' to you. This is typically information directly related to commitments we may have towards you/your company based on the partnership and/or contract that we have with you/your company. This use, including the collection of the personal data needed to do it, is necessary for the purpose of our legitimate interest to sustain the relationship with you or your company.

To do other things that you have explicitly asked us to do, for example if you chose to opt in to one or more specific activities that we offer. If you have opted in to a specific activity that we offer, this use, including the collection of the personal data needed to do it, is necessary for the performance of the contract we have with you – that is, our obligation to provide to you or enable you to take part in the offered activity.

#### WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

Asset ID do not sell your personal data. However, Asset ID operates globally and we may share your personal data with our group of companies and business partners – but only for the purposes described in this privacy notice.

Personal data encompassed by the GDPR may be transferred to organizations in countries outside the European Union and the European Economic Area. We will not transfer any of your personal data to organizations in countries outside of the European Union and the European Economic Area (third country) without ensuring appropriate safeguards for the protection of your personal data, for example the existence of a so called 'adequacy decision' by the Commission or the inclusion of the so-called 'standard contractual clauses' (as approved by the European Commission from time to time) in a contract between us and the third country recipient company of your personal data.

Video, photos and audio recordings collected for R&D purposes will be used by Asset ID internally and will not be distributed to any third party. Only those employees and consultants of Asset ID who are directly involved in the development of Asset ID products, and with a need to process the recorded material in order to fulfil their work tasks, will have access to the recorded material.

Video recordings collected for security purposes will be used by Asset ID internally and will not be distributed to any third party, unless Asset ID need to provide information at the request of authorities for further investigation.



Video, photos and audio recordings collected for marketing purposes may be distributed to the public for the purposes of demonstrating our products and technology and to market our company and business.

#### HOW LONG DO WE KEEP YOUR PERSONAL DATA?

General.

We will not use your personal data for any longer than needed in order to fulfil the purposes described in this privacy notice. After that, we will delete or permanently de-identify your personal data unless required or entitled by law to retain it, or parts of it.

Personal data in video- and audio recordings.

Asset ID will only store the video- and audio material recorded for security purposes for 3 days before being deleted, unless there is an incident captured which need further investigation.

Asset ID will only store video, photos and audio recorded for R&D or marketing purposes, which has not been anonymized, for 6 months after it has been recorded. After that, it will be deleted from Asset ID' servers, unless needed for further R&D purposes or marketing purposes (as applicable).



## WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL DATA?

Asset ID Ltd, incorporated under the laws of the United Kingdom of Great Britain and Northern Ireland, corporate registration number 5277818, is the data controller of your personal data collected and used for the purposes described in this privacy notice. This means that Asset ID Ltd is responsible for collecting and using your personal data in accordance with applicable law. Asset ID Ltd has its principal place of business at 70A High Street, Shepperton, Middlesex, TW17 9AU, United Kingdom. You can reach Asset ID Ltd's data protection office at [enquiries@AssetID.co.uk](mailto:enquiries@AssetID.co.uk).

When you use Asset ID' services you may, depending on and as part of such services, submit to or give us access to certain content, and the services may display such content, which Asset ID does not own or control. Examples of such data are image and video materials and other information about yourself and/or others, including any personal data contained therein, that you submit as part of using a service ('User Content'). For the purposes of this privacy notice, User Content is not the same thing as the personal data that we collect and use as a data controller according to this privacy notice. You, not Asset ID, are the controller of any User Content and we will only process it on your behalf according to your instructions and applicable law. Your submission and our processing on your behalf of User Content are governed by Asset ID' General Terms of Use (available [here](#)) and any applicable service specific Additional Terms of Use.

## WHAT ARE YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA HELD BY US?

If we process your personal data you have several rights as set out below. Asset ID value your privacy and recognize the importance of protecting your personal data and will never discriminate you for exercising any of these rights.

You can always verify and make corrections and additions to your personal data that are available when signed in to your Asset ID online account (go to your profile). You have a right to get information on what personal data we have about you, access this data, request that we erase certain parts or all of your personal data, request that we restrict the use of or stop using your personal data, and have your personal data resubmitted to you in a structured and accessible format.

If you wish to exercise any of these rights, go to [www.AssetID.co.uk/ContactUs](http://www.AssetID.co.uk/ContactUs) and submit your request (also available when you are signed in to your Asset ID online account). If you have any questions regarding your personal data that you believe were not answered in this privacy notice, you may contact our data protection office at [enquiries@AssetID.co.uk](mailto:enquiries@AssetID.co.uk).

Please note that if you ask us to erase or restrict the use of any of your personal data, we may not be able to continue managing your Asset ID online account and/or providing services to you.



Please also note that if you want us to erase or restrict the use of personal data relating to video- and audio recordings, you should specify the time and place for such recording to make it possible for us to amend or remove sequences involving such personal data.

If you have given your written consent to the processing, you have the right to withdraw the consent provided by you at any time by contacting us. If your consent is withdrawn, we will no longer process your personal data for the purpose that you had given your consent to.

Should you be dissatisfied with our collection and use of your personal data, please let us know and we will do our best to address your complaints. Your privacy is very important to us, and we always strive to protect and secure your personal data in the best possible way. Should you feel that we have failed in this ambition, you are entitled to lodge a complaint with the UK Data Protection Authority or other relevant supervisory authority, or such other supervisory authority as may be determined in the future.