PRIVACY POLICY

Last Updated: May 17, 2018

I PURPOSE AND PROCEDURE FOR THE PROCESSING OF PERSONAL DATA

Your privacy is very important to ***S.P. Securiton Alarm Systems Ltd,*** therefore we developed this policy to provide you with information on how we process your personal data when you seek services, interact with our customer support specialists and visit our website which will include a link to this Privacy Policy.

"Company" refers to S.P. Securiton Alarm Systems Ltd.

"Personal data" is information relating to an identified or identifiable natural person.

"Data" is personal data which you have made available to the Company.

"Supervisory Authority" is the independent public authority which is established by a Member State pursuant to GDPR Art 51.

II PURPOSE AND LEGAL GROUNDS

The personal data which you have provided will be processed as follows:

a) The Company processes your email address because we use your email address for communication purposes. The legal ground for processing your email address for this purpose is based on the Company legitimate interest in being able to communicate with you directly.

b) The Company also processes your email address for the purpose of sending you important information about our products, apps or account, such as important safety information or material changes to this Privacy Policy. The name you provide is associated with your account profile, and is displayed when you submit comments or other material to the Company. The legal ground for processing your email address and name for these purposes is the Company's legitimate interest in providing you important safety or other information about our products, apps or account or material changes to this Privacy Policy.

c) If you provide your opt-in consent to receiving marketing information from the Company, we will also process your email address for the purpose of sending you marketing information about the Company products and apps. The legal ground for processing your email address for this purpose is your consent. You may withdraw your consent at any time through the unsubscribe link at the bottom of our marketing emails. The marketing emails you receive from the Company are based on the preferences you provided us, the locale indicated by your Internet Protocol (IP) address, the types of devices you have installed, and any subscriptions included in your account. The legal ground for processing this data for this purpose is the Company's legitimate interest in reducing the number of marketing emails sent to each particular customer by selecting which customers receive a particular marketing email rather than sending every marketing email to every customer who has consented to receiving marketing emails.

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d) The Company also processes your email address to associate it with your account when you interact with our customer support representatives. The legal ground for this processing is our legitimate interest in providing quality customer support.
e) Personal data that is processed when you contact us through the Company's website is made available to the Company by the social media provider due to the way the website configuration works. If you choose to do this you will be asked whether you agree that the social media provider may provide certain information to the Company such as your name, address, contact number and email address.
f) The Data may be processed in hardcopy, by automated or electronic means.

III PERSONAL DATA PROCESSED WHEN YOU COMMUNICATE WITH THE COMPANY

When you interact with our customer support representatives via email, telephone, online or in person, we collect personal data, such as your name, mailing address, phone number, email address and contact preferences; and information about the Company products you own, such as their serial numbers and date of purchase. We also may create event logs that are useful in diagnosing product or app performance-related issues, and capture information relating to the support or service issue. To improve customer service, subject to applicable laws, we may also record and review conversations with customer support representatives, and analyze any feedback provided to us through voluntary customer surveys. With your consent, our customer support representatives may sign in to your installation, if applicable, to help troubleshoot and resolve your issue.

We use this information to provide you with customer and product support and to monitor the quality and types of customer and product support we provide to our customers. The legal ground for processing this information for these purposes is ***S.P. Securiton Alarm Systems Ltd*** legitimate interests in providing quality product support.

IV RECIPIENTS OF THE DATA

The Data may be processed by natural persons and/or legal entities, acting on behalf of the Company and under specific contractual obligations, based in EU Member States or in countries outside the EU. The Data may be communicated to third parties to comply with legal obligations, to execute Public Authorities orders or to exercise a Company right before judicial authorities.

We may disclose personal data about you to others: (a) if we have your valid consent to do so; (b) to comply with a legal order, court order, legal process, or other legal obligation; (c) to enforce any of our terms and conditions or policies; or (d) as necessary to pursue available legal remedies or defend legal claims. We may also transfer your personal data to an affiliate, a subsidiary or a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of ***S.P. Securiton Alarm Systems Ltd*** business, assets or stock, including, without limitation, in connection with any bankruptcy or similar proceeding, provided that any such entity that we transfer personal data to will not be permitted to process your personal data other than as described in this Privacy Policy without providing you notice and, if required by applicable laws, obtaining your consent.

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V DATA TRANSFER OUTSIDE OF THE EEA

Within its contractual relations the Company may transfer the Data in countries outside of the European Economic Area (EEA), including store them in databases managed by entities acting on behalf of the Company. Databases management and Data processing are bound to the purposes of the processing and are carried out according to applicable data protection law.

In case the Data are transferred outside of the EEA the Company will use all appropriate contractual measures to guarantee an adequate protection of the Data including – among others – agreements based on the standard contractual clauses adopted by the EU Commission to rule the transfer of personal data outside of the EEA.

VI CONTROLLER AND DATA PROTECTION OFFICER (DPO)

The Controller is ***S.P. Securiton Alarm Systems Ltd,*** with registered office at Dorieon and Dodekanisou 15, 3021 Limassol, Tel: +357 25 822990. You can contact the Data Protection Officer at the email address dpo@securiton.com.cy.

VII DATA RETENTION

The Data processed to provide the Service and the Customer Satisfaction (if applicable) will be kept by the Company for the period deemed strictly necessary to fulfill such purposes. Concerning the Data processed for the provision of the Service, the Company may continue to store these Data for a longer period, as may be necessary to protect Company's interests related to potential liability related to the provision of the Service.

VIII PRIVACY POLICY UPDATES

We may update this Privacy Policy from time to time as we add new products and services, as we improve our current offerings and as technologies and laws change. You can determine when this Privacy Policy was last revised by referring to the "Last updated" legend at the top of this page. Any changes will become effective upon our posting of the revised Privacy Policy.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. This notice will be provided by email or by posting notice of the changes on the S.P Securiton Alarm Systems Ltd website that link to this Privacy Policy.

IX YOUR RIGHTS

If you reside in the European Union, you have the right under the General Data Protection Regulation (GDPR) to request from S.P. Securiton Alarms Ltd access to and rectification or erasure of your personal data, data portability, restriction of processing of your personal data, the right to object to processing of your personal data, and the right to lodge a complaint with a supervisory authority. You can exercise the following rights:

- ✓ **Right to Access -** the data subject has the right to obtain from the controller confirmation as to whether or not personal data concerning him/her is being processed and, where applicable, have access to them (Art 15 GDPR)
- ✓ **Right to Rectification –** the data subject has the *right* to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her (Art 16 GDPR).

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- ✓ **Right to erasure -** means that the data subject has the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay, when such request is legitimate (Art 17 GDPR)
- ✓ **Right to Restriction of processing -** gives individuals the *right* to restrict the *processing* of their personal data in certain circumstances. This means that an individual can limit the way that an organisation uses their data (Art 18 GDPR) .Right to Data Portability - the data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided (Art 20 GDPR) Right to Object - the data subject has the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including when the Data are processed for marketing or profiling, if applicable (Art 21 GDPR)
- ✓ **Right to Lodge a Complaint -** without prejudice to any other administrative or judicial remedy, every data subject shall have the right to lodge a complaint with a Supervisory Authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement if the data subject considers that the processing of personal data relating to him or her infringes this Regulation (Art 77 GDPR).

To request access to or rectification, portability or erasure of your personal data, or to delete your ***S.P. Securiton Alarm Systems Ltd*** account, contact the Data Protection Officer (para VI).

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