

PRIVACY POLICY

Reveal Media Limited (“Reveal”, “we”, “us” or “our”) is a company incorporated in England and Wales with company number 04470201. Our registered office is Grant Thornton UK LLP, 300 Pavilion Drive, Northampton, NN4 7YE.

This policy sets out the basis on which we process any personal data we collect from individuals, or that individuals provide to us, or that we obtain from other sources in each case in connection with:

- use of our websites www.revealmedia.com, www.revealmedia.co.uk, www.revealmedia.in and www.revealmedia.asia (collectively referred to as “our website”);
- the purchase of our hardware and software products and/or services;
- the ongoing maintenance or repair of our hardware and software products and/or services.

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 are committed to maintaining the privacy and protection of all personal data that we process in connection with our business. If you have any questions regarding our privacy policy, please contact us (our contact details are set out in section 13).

1 REVEAL AND PERSONAL DATA

1.1 When our customers (companies, public bodies, emergency services etc.) use our services and products, for example to capture and process body worn camera footage, such footage and related data may include the personal data of members of the public. We provide our services as a processor on behalf of our customers acting as the controller of this information. It is the responsibility of our customers to determine how the footage and related data is captured, processed and deleted and to ensure there is a lawful basis for its use. If you have any specific queries or concerns about how such footage and related data is being handled you should contact the relevant organisation (our customers) in their capacity as a controller.

2 BASIS FOR PROCESSING PERSONAL DATA

2.1 Sections 2.2 – 2.7 below explain how and why we process an individual's personal data, as well as the legal basis on which this processing is carried out.

2.2 **To provide customer services to our customers:** We may process personal data in order to provide various supporting customer services to individuals (such as individuals who work for and on behalf of our customers and where those individuals contact us with a question in connection with a product or service and/or requests certain information from us). We may also process personal data in respect of these individuals in order to carry out repairs or ongoing maintenance at their request on the software or hardware we have provided.

The legal basis on which we process an individual's personal data in these circumstances is our respective legitimate interests in dealing with customer service requests, responding to communications and solving customers' issues. If

an individual does not provide us with the personal data we request from them for customer services purposes, we may not be able to fully answer their queries.

- 2.3 To make our website better:** We may process an individual's personal data in order to provide such individual with a more tailored user experience, including using their personal data to make sure our website is displayed in the most effective way for the device such individual is using. This processing means that an individual's experience of our site will be more tailored to them, and that the products an individual sees on our site may differ from someone accessing the same site with a different purchase history or browsing habits. We also use various cookies to help us improve our website (more details are set out in section 5), and share an individual's personal data with the third party analytics and search engine providers that assist us in the improvement and optimisation of our website.

We will also process personal data for the purposes of making our website more secure, and to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

The legal basis on which we process personal data in these circumstances is our legitimate interest to provide an individual with the best customer experience we can, keep our website updated and relevant, study how customers use our products and/or services to inform our marketing strategy and to ensure that our website is kept secure.

- 2.4 For marketing purposes: Where:**

- 2.4.1 individuals have expressly opted in to receive marketing communications from us, we will process their personal data to provide such individual with marketing communications in line with the preferences they have provided;
- 2.4.2 individuals have expressly opted in via our site to receive marketing communications from a third party, we will process such individual's personal data by transferring it to the relevant third party,

in each case, the legal basis on which we process personal data is consent and/or our legitimate interest to develop our products and/or services and grow our business. An individual is not under any obligation to provide us with their personal data for marketing purposes, and individuals can withdraw their consent to their personal data being processed in this way at any time by contacting us (please see section 13) or, where relevant, by following the unsubscribe link in every marketing communication individuals receive from us. If an individual does choose to withdraw their consent, this will not mean that our processing of such individual's personal data before they withdrew their consent was unlawful.

- 2.5 If our business is sold:** We may transfer individual personal data to a third party:

- 2.5.1 in the event that we sell or buy any business or assets, in which case we will disclose personal data to the prospective seller or buyer of such business or assets (at all times in accordance with all applicable data protection laws); or
- 2.5.2 if Reveal Media Limited or substantially all of its assets are acquired by a third party, in which case personal data held by Reveal Media Limited about its

customers (including those individuals who work for and on behalf of our customers) will be one of the assets transferred to the purchaser,

in each case, the legal basis on which we process data in these circumstances is our legitimate interest to ensure our business can be continued by a purchaser. If individuals object to our use of personal data in this way, the relevant seller or buyer of our business may not be able to provide the applicable products and/or services.

- 2.6 **To notify individuals of changes to our privacy policy:** We may process personal data in order to update individuals to any changes made to our privacy policy (more details are set out in section 12).

The legal basis on which we process personal data in these circumstances is our legitimate interest to remain transparent in our use of individuals' personal data and to ensure individuals are kept updated on how and why we process their personal data.

- 2.7 In certain circumstances we may also need to share personal data if we are under a duty to disclose or share personal data in order to comply with any legal obligation.

3 CATEGORIES OF INFORMATION WE COLLECT FROM INDIVIDUALS

- 3.1 We will collect and process the following personal data.

- 3.2 **Information individuals give us:** Individuals (such as individuals working for and on behalf of a customer) may provide their personal information when making enquiries about and purchasing our products and/or services, filling in forms on our website, corresponding with us about repairs or maintenance of our products and/or services or other general correspondence with us by phone, e-mail or otherwise.

- 3.3 **Online information we collect:** With regard to visits to our website we may automatically collect the following information:

3.3.1 technical information, including the Internet protocol (IP) address used to connect an individual's computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, other hardware information, domain name, operating system and platform and possibly other software information;

3.3.2 information about an individual's visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

- 3.4 **Information we receive from other sources:** We may receive information about an individual through the use our website or through use of the other services we provide. We work closely with third parties (including, companies who provide us with marketing lists, as well as other business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies and hosting providers) from whom we may also receive information about individuals.

- 3.5 We do **not** process (as a controller) any special categories of personal data, meaning personal data revealing:
- 3.5.1 racial or ethnic origin;
 - 3.5.2 political opinions; religious or philosophical beliefs or trade union membership;
 - 3.5.3 genetic or biometric data that uniquely identifies you; or
 - 3.5.4 data concerning your health, sex life or sexual orientation.

However, our customers may process this type of data in their capacity as a controller.

- 3.6 We do not collect data relating to criminal convictions or offences or related security measures.

4 CATEGORIES OF RECIPIENTS OF PERSONAL DATA

- 4.1 The details in our Privacy Policy relating to third parties other than Reveal Media Limited are for information only. We are not responsible for the privacy policies or practices of third party recipients of an individual's personal data. Where third parties are recipients of an individual's personal data from us, please ensure that as that individual you read any information those third parties provide about how, why and the legal basis for, their processing of such personal data and make your own enquiries in respect of them.

- 4.2 An individual's personal data may be shared by us with external third parties for the purposes set out in section 2. Sections 4.3 to 4.4 below, detail our main third party recipients of personal data.

- 4.3 An individual's personal data may be shared by us with external third parties who provide support integral to the provision of our products and services and enable us to operate our business. These include:

4.3.1 A service provider who provides us with support for non-evidential and evidential hardware repair services and customer support. The information we provide to this service provider includes contact details of individuals who work for and on behalf of our customers.

4.3.2 A service provider who provides data loader software for our Customer Relationship Management System which allows us to securely import and export data to our outsourced repair centre.

4.3.3 Other cloud storage providers who provide cloud storage services to enable us to provide our customers with a digital evidence management solution.

If further information on the above-mentioned service providers is required, please contact us directly (please see section 13).

- 4.4 We may share an individual's personal data with external third parties who provide marketing and software services, as set out in section 2.4. These parties include the following:

4.4.1 The provider of our Customer Relationship Management System. Our data is hosted in the EU.

4.4.2 The provider of our Media Hub. Our data is hosted in the EU.

If further information on the above-mentioned service providers is required, please contact us directly (please see section 13).

5 COOKIES

5.1 Our website uses cookies to distinguish individuals from other users of our website. This helps us to provide individuals with a good experience when they browse our website and also allows us to improve our website. By continuing to browse the website, users are agreeing to our use of cookies.

5.2 A cookie is a small file of letters and numbers that we store on an individual's browser or the hard drive of their computer. We only use (and store) non-essential cookies on an individual's computer's browser or hard drive if they provide their consent.

5.3 We use the following cookies:

Cookie	Purpose	Expiration	Provider
exp_last_activity	Visitor tracking set by own CMS	1 year	Reveal
exp_tracker	Visitor tracking set by own CMS	session	Reveal
exp_csrf_token	Visitor tracking set by own CMS	1 hour	Reveal
exp_last_visit	Visitor tracking set by own CMS	1 year	Reveal
cb-enabled	Cookie policy popup related	session	Reveal
reveal	Session management cookie	15 days	Reveal
IDE	One of the main advertising cookies on non-Google sites	1 year	doubleclick.net
visitor_id147231hash	CRM tracking	10 years	pardot.com
visitor_id147231	CRM tracking	10 years	pardot.com
visitor_country	CRM tracking	10 years	pardot.com
pardot	CRM tracking	session	pardot.com
lpv147231	CRM tracking	session	pardot.com

dtCookie	CRM tracking	session	pardot.com
whoson	Live Chat module	end of 2020	whoson.com
_vwo_uuid_v2	Visual Web Optimiser	1 day	vwo.com
_gid	Google Analytics	1 day	Full explanation of Google Analytics cookie usage available here: https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage
_ga	Google Analytics	2 years	

5.4 Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

5.5 Individuals can block cookies by activating the setting on their browser that allows such individual to refuse the setting of all or some cookies. However, if individuals use their browser settings to block all cookies (including essential cookies) they may not be able to access all or parts of our website.

5.6 Except for essential cookies, all cookies will expire as outlined under the expiration column in the table included in paragraph 5.2.

6 USES MADE OF THE INFORMATION

6.1 We will combine the information individuals provide to us with information we collect about them. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

The transmission of information via the internet is not completely secure. Although we will do our best to protect an individual's personal data, we cannot guarantee the security of data transmitted to our website; any transmission is at the individual's own risk. Once we have received an individual's information, we will use strict procedures and security features to try to prevent unauthorised access.

7 WHERE WE STORE PERSONAL DATA

7.1 Our customers may be based outside the European Economic Area (EEA) so their processing of individuals' personal data will involve the transfer and storage of data outside the EEA. Some of our suppliers are based outside the EEA.

7.2 Whenever we transfer personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- 7.2.1 We will only transfer personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
 - 7.2.2 Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
 - 7.2.3 Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.
- 7.3 If further information on the specific mechanism used by us when transferring an individual's personal data out of the EEA is required please contact us directly (please see section 13).
- 7.4 All information individuals provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given an individual (or where the individual has chosen) a password which enables access to certain parts of our website, the individual is responsible for keeping this password confidential and must not share this password with anyone.

8 PERIOD OF STORAGE

- 8.1 Where an individual orders goods and/or services from us, we will retain their data for a period of 6 (six) years after the goods were delivered and/or the services performed, to ensure that we are able to assist such individual should they have any questions or feedback in relation to our goods and/or services or to protect, or defend our legal rights.
- 8.2 Where we have processed an individual's personal data to provide them with marketing communications with consent, we may contact such individual at least every twelve (12) months to ensure they are happy to continue receiving such communications. If an individual tells us that they no longer wish to receive such communications, their personal data will be removed from our lists.
- 8.3 Where we have processed an individual's data for any other reason (such as where they have contacted us with a question in connection with our goods and/or services), subject to section 8.1, we will retain their data for twelve (12) months.

9 AN INDIVIDUAL'S RIGHT TO OBJECT UNDER DATA PROTECTION LAWS

- 9.1 **Individuals have the right to object to us processing their personal data where we are processing personal data:**
 - 9.1.1 **based on our legitimate interests (as set out at sections 2.2 to 2.6 above). If individuals ask us to stop processing their personal data on this basis, we will stop processing their personal data unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws; and**
 - 9.1.2 **for direct marketing purposes. If individuals ask us to stop processing their personal data on this basis, we will stop.**

In each case please do so by making contact with us directly (please see section 13).

10 AN INDIVIDUAL'S OTHER RIGHTS UNDER DATA PROTECTION LAWS

Right of access

- 10.1 Individuals have the right to receive confirmation as to whether their personal data is being processed by us, as well as other information relating to our use of personal data. Individuals also have the right to access their personal data which we are processing. Individuals can exercise this right by making contact with us directly (please see section 13).

Right to rectification

- 10.2 Individuals have the right to require us to rectify any inaccurate personal data we hold about them. Individuals also have the right to have incomplete personal data we hold about them completed, by providing a supplementary statement to us.

Right to restriction

- 10.3 Individuals have the right to restrict our processing of their personal data where:
- 10.3.1 the accuracy of the personal data is being contested by them;
 - 10.3.2 the processing by us of their personal data is unlawful, but they do not want the relevant personal data erased;
 - 10.3.3 we no longer need to process their personal data for the agreed purposes, but they want to preserve your personal data for the establishment, exercise or defence of legal claims; or
 - 10.3.4 we are processing their data on the basis of our legitimate interest (as set out at sections 2.2 to 2.6 above) and they:
 - 10.3.4.1 object to our processing on the basis of our legitimate interest under section 9.1.1 above; and
 - 10.3.4.2 want processing of the relevant personal data to be restricted until it can be determined whether our legitimate interest overrides their legitimate interest.
- 10.4 Where any exercise by an individual of their right to restriction determines that our processing of particular personal data is to be restricted, we will then only process the relevant personal data in accordance with their consent and, in addition, for storage purposes and for the purpose of legal claims.

Right to data portability

- 10.5 Individuals have the right to receive their personal data in structured, standard machine readable format and the right to transmit such personal data to another controller.

Right to erasure

- 10.6 Individuals have the right to require we erase their personal data which we are processing where one of the following grounds applies:

- 10.6.1 the processing is no longer necessary in relation to the purposes for which their personal data was collected or otherwise processed;
 - 10.6.2 our processing of their personal data is based on their consent, they have subsequently withdrawn their consent and there is no other legal ground we can use to process their personal data;
 - 10.6.3 they object to the processing of their personal data as set out in section 9.1.1 above and we have no overriding legitimate interest for our processing;
 - 10.6.4 the personal data have been unlawfully processed; and
 - 10.6.5 the erasure is required for compliance with a law to which we are subject.
- 10.7 Individuals have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.
- 10.8 **Exercising individual rights:** Individuals can exercise their rights by making contact with us directly (please see section 13).

11 LINKS ON OUR WEBSITE

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Our service connects individuals to different websites. If individuals follow a link to any of these websites or use their service, please note that the individual has left our website and these websites have their own privacy policies. We do not accept any responsibility or liability for these policies or websites. Please check these policies before submitting any personal data to these websites.

12 CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this webpage and, where appropriate, notified to individuals by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

13 CONTACT

Questions, comments and requests regarding this privacy policy are welcomed.

Individuals can contact us by telephoning +44 (0) 203 890 2000 or by writing to us at legal@revealmedia.com.

Our Data Protection Officer, Sharon Douglas, can be contacted by telephone on +44 (0) 203 890 2000 or by email at DPO@revealmedia.com.

This privacy policy was last updated on 24th May 2018.

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