

Privacy Statement

Protecting your privacy is important to PhoneWatch (“we”, “us”, “our”, “PhoneWatch”). This Privacy Statement is applicable to Personal Data collected and processed by PhoneWatch in relation to www.phonewatch.ie (the “Website”) and providing our alarm monitoring and maintenance service (the “Service”) at your premises (the “Premises”). In order to help you understand how we will use the data you provide, the following guidelines have been created.

This Privacy Statement discloses information practices, including what type of Personal Data we may collect and hold, how it is used and with whom that data is shared. It also explains how you can contact us if you have any queries or concerns about the personal information we process about you.

1. General statement

We fully respect your right to privacy and will not collect any personal information about you without your consent. Any personal information that you volunteer to us will be treated with the highest standards of security and confidentiality, strictly in accordance with the Data Protection Acts 1988 and 2003.

By using the Website and/or by availing of the Service, you signify acceptance of this Privacy Statement. If you do not agree with or you are not comfortable with any aspect of this Privacy Statement, your only remedy is to discontinue use of the Website and/or to cancel the Service we provide to you. We reserve the right to modify this Privacy Statement at any time. Your continued use of any portion of the Website and/or continuing to avail of the Service following notification or posting of such changes will constitute your acceptance of those changes. Any changes to this Privacy Statement will be posted on the Website so you are aware of what information we collect, how we use it and under what circumstances, if any, we disclose it.

If you have any questions, comments or concerns about this Privacy Statement you should e-mail info@phonewatch.ie.

2. What Personal Data we need

Personal Data means any data related to a person that allows that person to be identified such as your name, age, telephone number, e-mail and mailing address. In the context of the Service, Personal Data may also include the details of your keyholders, payment history and images taken by the PIRCam that are installed at your Premises as part of the Service.

Marketing information

In general, you can visit the Website without telling us who you are and without providing any Personal Data. There are times, however, where not providing the minimum necessary data as indicated in the relevant data entry sections and other pages on the Website, may result in our inability to sell you products and/or provide you with certain services, including after sales services.

Visual information

The PIRCam which we install at your Premises as part of the Service will take a total of 5 images when the sensor is triggered.

These images will be automatically sent to us. The images will be used for verification purposes and then stored locally for a limited period before being destroyed.¹

3. Why we collect Personal Data

We collect, maintain and use your Personal Data:

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- (a) to fulfill our obligations under any contract between you and PhoneWatch;
- (b) to ensure that content from the Website is presented in the most effective manner for you and for your computer;
- (c) to notify you about changes to the Website and/or the Service;
- (d) to ask your opinions on our goods and services and conduct surveys;
- (e) where you agree, to provide you with the latest information, including special offers in which you may be interested;
- (f) to improve the Service for you;
- (g) to provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- (h) to conduct prize draws, contests and other promotional offers; and
- (i) for verification, administration and statistical analysis purposes.

We will use your Personal Data only for the purposes outlined above.

We may also use your Personal Data to allow you to participate in interactive features of the Website, or disclose your Personal Data to selected third parties to use your Personal Data to provide you with information about products and services which may be of interest to you and we or they may contact you about these by post or telephone.

If you are an existing customer, we will only contact you by electronic means (such as email, voicemail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.

If you do not want us to use your Personal Data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant boxes when we collect your marketing preferences.

4. How we collect Personal Data

We collect your Personal Data in several ways. For example, we might ask for your contact information when you correspond with us, get a quote, register to subscribe to our mailing list, etc. Below are some of the most typical examples of how we collect your Personal Data.

- (a) When you sign up to the Service.
- (b) When you fill out a get a quote online or by phone, we will keep a record of your name, address data, query, etc.
- (c) When you fill out an application to join our newsletter, we will keep a record of your name, address details, etc.
- (d) We will also keep a record of any preference you provide to enable us to send you newsletters that would most likely interest you.
- (e) When the Alarm System installed at your Premises is activated, Personal Data will be collected including the images from the PIRCamS noted above.

5. Your preferences

The Personal Data we collect may be stored in different databases. We make every effort to take into account the various preferences you may have expressed over time in order to process your data in a consistent way. If for any reason you receive incorrect data, please contact us to rectify the situation.

6. When we disclose Personal Data

We will not disclose Personal Data to third parties, without your consent, except in the following cases:

- PhoneWatch uses other companies to perform functions on its behalf (including other companies in the Sector Alarm Group), such as processing sales orders, delivering packages, sending postal mail and e-mails, providing maintenance services or marketing assistance and processing credit card payments. Such companies will have access to Personal Data needed to perform these functions, but may not use it for any other purpose and are required to process the data in accordance with applicable law.
- Personal Data may be disclosed to the An Garda Síochaná or other emergency services to ensure they respond to alarm activations. Specifically included is:
 - (a) notice of intention to install the Alarm System at the Premises;
 - (b) the service by us on An Garda Síochaná and any accredited standards authority in Ireland of a Certificate of Completion of the installation of the Alarm System at the Premises;
 - (c) the service by us on An Garda Síochaná of notice of any change, removal or relocation of the Alarm System;
 - (d) the storage on computer and the retention by An Garda Síochaná of data on the Alarm System for the purpose of crime prevention and detection; and
 - (e) the inspection by An Garda Síochaná, any accredited standards authority in Ireland, the Private Security Authority (or any other similar person/body) of the Alarm System at the Premises upon reasonable advance notice to you.
- Personal Data may be disclosed to sub-contracting third parties to enable the performance of contracts you are party to.
- Personal Data may be disclosed to third parties to enable compliance with legal obligations to which PhoneWatch is subject.

If Personal Data is disclosed to third parties to enable them to provide services for, on behalf of, or under our direction, then we will take measures to ensure that the third parties comply with our own Privacy Statement, and that such recipients:

- do not use the Personal Data for any other purposes than those permitted; and
- obtain and process Personal Data only on condition that they protect that Personal Data from unauthorised use and adopt and comply with similarly stringent policies and terms on Personal Data protection and use.

7. Security of collected data

We intend to protect your Personal Data and to maintain its quality. We will use all reasonable efforts to take all appropriate technical and organisational measures and precautions to keep Personal Data secure and protected from unauthorised access, use or alteration and unlawful destruction. Measures include using Secure Sockets Layer (SSL) encryption when collecting or transferring sensitive data, such as credit card details. SSL encryption is designed to make the data unreadable by anyone but us. The steps we take to protect your data include:

- (a) We limit access to your Personal Data. Only those employees and agents who need to come into contact with that data, to provide products and services to you, will do so.

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- (b) We have physical, electronic, and procedural safeguards that comply with regulations to protect your Personal Data.
- (c) We allow for your account data to be password protected.

In accordance with best practice on the Internet, it is recommended that individuals do not use trivial login names and passwords. Passwords should contain a combination of letters and numbers, be kept securely and changed periodically.

We take your online security very seriously and the Website has security measures in place to protect the loss, misuse and alteration of the information under our control. However, as no data transmission over the Internet can be guaranteed as 100% secure, we cannot ensure or warrant the security of any information you transmit to us and you transfer the data at your own risk. We endeavour to use appropriate security measures as described above.

8. Cookies & Web Beacons

We employ an industry-wide technology called "*cookies*". These are small pieces of data that are placed on your hard disk drive when you access the Website or a certain part of the Website. Cookies help us understand which parts of the Website are the most popular, where our visitors are going, and how much time they spend there.

We use cookies to study traffic patterns on our site in order to improve the performance of the Website, to customise the user experience, and to better match the users' interests and preferences. For example, we keep track of the domains from which people visit, and also measures visitor activity on the Website. However, these tracking records are performed and maintained in ways that keep the data non-identifiable.

Cookies may also be used to recognise your computer next time you visit a website. This might save you time (e.g. by ensuring that you do not have to register again) or help you by customising your internet settings.

Web beacons, also known as single pixel, clear gif technology or action tags, may be used on our site. This technology shows us which visitors clicked on key elements (such as links or graphics) on one of our site pages or emails. When you ask us to send you information on a promotion or a newsletter, we may use web beacons to establish which emails are actually opened. We use this information in order to optimise our site content and services. These web beacons usually work in conjunction with cookies.

You may refuse to accept or you may disable cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website or unable to avail of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to the Website.

You can find out how to do this for your particular browser by clicking "help" on your browser's menu or by visiting www.allaboutcookies.org.

The following are the cookies we use on the Website:

Name of Cookie	Purpose of Cookie
Session Cookie	To allow the Website remember a user on their return visit to the Website.
_utma (Google Analytics)	Tracks how many times (if any) you have visited the Website before.
_utmb (Google Analytics)	Tracks how long you stay on the Website.

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_utm (Google Analytics)	Tracks how long you stay on the Website.
_utmz (Google Analytics)	Identifies where you have come from e.g. from a search engine or from another website.
optimizelySegments	
optimizelyEndUserId	
optimizelyBuckets	

9. Your Rights

Right of Access to your Personal Data

You have the right to access your Personal Data to rectify or delete inaccuracies and to object to the processing of your Personal Data. Contact us if you would like to view your Personal Data stored in our database. For privacy protection reasons, you will be asked to provide some proof of identification and we may also charge a small fee (not to exceed €6.35).

On demand, you can receive an explanation regarding the processing of your Personal Data and also obtain confirmation that all relevant parties have been notified of your request(s) for information, for alteration or for deletion, as appropriate. We will do our best to comply with such requests.

If you would like to unsubscribe from an email sent to you, please contact us at info@phonewatch.ie.

Right of rectification or erasure

Under the Data Protection Acts, you have the right to have your Personal Data corrected, if inaccurate, or erased, if there is not a legitimate reason for retaining the data. A request for rectification or erasure should be made in writing, by letter or email, signed and accompanied by a copy of a current identification document (e.g. passport, driving license) to us by any of the contact methods mentioned below in the Contact Us section.

10. Links to other sites

Some website pages may contain links to other websites that are not operated by us. We do not share your Personal Data with those websites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other sites and expressly disclaims all liability associated with your use of such other sites and the content found there.

11. Sale of Business

We reserve the right to transfer information (including your Personal Data) to a third party in the event of a sale, merger, liquidation, receivership or transfer of all or substantially all of the assets of our organisation provided that the third party agrees to adhere to the terms of this Privacy Statement and provided that the third party only uses your Personal Data for the purposes that you provided it to us.

12. Transfers

It may be necessary, from time to time, for your Personal Data to be transferred to someone who provides a service to us in other countries, including countries outside of the European Economic Area (EEA). In addition your Personal Data may need to be stored in servers located outside the EEA. By submitting your Personal Data, you explicitly agree to this transfer, storing or processing such Personal Data outside the EEA. If we do this, we will ensure that anyone to whom we pass your Personal Data agrees to treat your Personal Data with the same level of protection as if we were dealing with it.

13. Contact Us

If you need further assistance or would like to make a comment, please e-mail info@phonewatch.ie or contact us at:

PhoneWatch,
Floors 3-5, Block 1,
Irish Life Centre
Lower Abbey Street,
Dublin 1.

Tel: 01 207 6100
Fax: 01 295 8199

Changes to this Statement

Any changes to this Privacy Statement will be posted on the Website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any time we decide to use Personal Data in a manner significantly different from that stated in this Privacy Statement, or otherwise notified to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your information in the new manner.

Last Updated

This Privacy Statement was last updated on May 7th 2014.

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