



WEBSITE PRIVACY NOTICE

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WEBSITE PRIVACY NOTICE

This notice is intended to explain how we use your information and what your rights are in relation to how we use your information.

WHO WE ARE

4Sight Imaging Limited ('the Company') is a private limited company registered in England and Wales with company number 05214775. The Company's contact address is 4Sight Imaging, 5th Floor (Left), 120 Bark Street, Bolton, BL1 2AX.

The Company is the 'Controller' for data protection purposes. This means that the Company collects and holds your information and decides what it will be used for. The Company is subject to the requirements of data protection legislation applicable to the UK and must use your personal data in accordance with the law. The Company is registered with the Information Commissioner's Office (ICO), with registration number ZA060678.

HOW YOU CAN CONTACT US

We have appointed Rachael Jackson as our Data Protection Manager and you can contact her to discuss this privacy notice any data protection related issues or queries.

Telephone: 01204 216162

Email: info@4sightimaging.com

Post: 4Sight Imaging, 5th Floor (Left), 120 Bark Street, Bolton, BL1 2AX

IF YOU ARE A VISITOR TO OUR WEBSITE

Analytics and cookies

When you visit our website, we use Google Analytics (a third-party service) to collect standard internet log information and details of visitor behaviour patterns. We do this so that we can find out how people use our website e.g. how many people visit our website and which areas they look at.

We have anonymised this information by ensuring that your IP address cannot be identified.

The information generated by Google Analytics is transmitted to and stored by Google on servers in the United States. Google agrees to the standard contractual clauses (adopted by the EU Commission) for data protection which puts it under an obligation to meet certain security standards approved by the EU. Google will use the information on behalf of the Company for the purposes of evaluating your use of the website, compiling reports on website activity for us and providing us with other services relating to website activity and internet usage.

You may refuse the use of the cookies used by Google Analytics via the settings in your browser (see cookies section below). To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.



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Our lawful basis for using your information in this way will be two-fold:

- 1) For our legitimate interests in understanding how our website is used; and
- 2) Your consent to our use of analytics and cookies via the consent bar which would have appeared when you first accessed our website.

Using our contact form

If you submit your personal details to us by completing and submitting our contact form, we will use your information to:

- Contact you to respond to your request for contact.
- Send information to you about the firm and its services, where you have given us express authority to do so.

We will add your contact details to our electronic marketing database and keep them for as long as you provide your consent for us to use your contact details in this way.

Our lawful basis for using your information in this way will be two-fold:

- 1) For our legitimate interests in marketing our services; and
- 2) Upon your express consent (where required by law).

Will not share information received through our contact form with any third party unless you expressly authorise us to do so or we are required by law.

IF YOU MAKE AN ENQUIRY TO OUR COMPANY

Where you make an enquiry to the Company but do not instruct us following that enquiry, we will hold details of your enquiry on our systems for up to 12 months. This is for our legitimate interests in being able to ensure that we can recall your enquiry should you revisit the matter with us some weeks or months later, therefore improving your experience with us, and to ensure that we can call upon it if any complaint is made about the way that we handled your enquiry. After this time, the record of your enquiry to us, along with your personal data that you provided to us, will be permanently deleted from our systems.

If we seek consent from you to send details of our services that we may think may interest you in the future, then we will hold your contact details on our marketing database until you ask us to stop sending such materials. Where this is by email, you can unsubscribe from our marketing at any point using the unsubscribe facility in each and any marketing email that we send to you. Your details will be removed from our systems as soon as possible after receipt of a notification from you that you no longer wish to receive our marketing material, and no longer than one month after receipt of your notice.

IF YOU ARE A CUSTOMER

Legal basis for processing personal data

We keep your personal data confidential and will not disclose it to third parties unless disclosure is:



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- (a) Authorised by you.
- (b) Necessary as part of the products and/or services we are providing to you (to perform our contract with you).
- (c) Required by law.
- (d) Necessary for the purposes of our legitimate interests or those of a third party (in other words, we have a compelling justification for the disclosure or processing).
- (e) Necessary to protect your vital interests or those of another person i.e. to protect a life.

Our reasons for processing your personal data will also fall into at least one of the five categories listed above.

We do not process any special categories of personal data belonging to our customers.

Please contact us if you would like more information about our legal basis for processing your personal data.

How we use your personal data

We use your information primarily to provide our automatic vision software products and services to you. We also use your information for: accounting and billing purposes; to comply with our legal obligations, and to manage our business effectively. With your authority, we may also send you information about our products, services, or events that we think may be of interest to you. We will seek your written consent to do this.

Sharing your personal data with third parties

We may, on your authority, work with other professionals to assist us in delivering products and service to you and may need to disclose relevant information about you to them. Examples include software developers, hardware providers etc.. We will seek your consent to do this.

Sometimes we outsource part of our work to other people or companies to improve efficiency and your customer experience. We will always carry out due diligence and obtain confidentiality undertakings from such outsourced providers. We will seek your written consent as to whether you are happy for us to outsource relevant aspects of our service as appropriate to our providers. If you would like more information about our outsourcing arrangements, please contact us.

Contacting you

We may correspond with you by email if you provide us with an email address, unless you advise us in writing that you do not wish us to do so. You acknowledge that email may not be secure. Email will be treated as written correspondence and we are entitled to assume that the purported sender of an email is the actual sender and that any express or implied approval or authority referred to in an email has been validly given. Please be aware that the Company may monitor and read any email correspondence travelling between you and any mail recipient at the Company as part of its monitoring activities to ensure compliance with its Information Management and Security Policy.

We will aim to communicate with you by such method as you request. More often than not this will be in writing but may be by telephone if it is appropriate.



WEBSITE PRIVACY NOTICE

Where you provide us with fax or email addresses for sending material to, you are responsible for ensuring that your arrangements are sufficiently secure and confidential to protect your interests. You must tell us if this method of communication is not secure so that can use an alternative method.

Protecting personal data

The internet is not secure and there are risks if you send sensitive information in this manner or you ask us to do so. Please be aware that the data we send by email is not routinely encrypted.

We will take reasonable steps to protect the integrity of our computer systems by screening for viruses on email sent or received. We expect you to do the same for your computer systems.

Bank details

It is very unlikely that we will change our bank account details during the course of your matter. In any event, we will never contact you by email to tell you that our details have changed. If you receive any communications purporting to be from this Company, that you deem suspicious or have any concerns about (however slight), please contact our office by telephone straightaway.

Holding your personal data

We may hold your information both electronically and in paper format. We will use all reasonable measures to ensure that your information remains confidential and will advise you immediately if we believe that any of your information has been released.

Retention and destruction of your personal data

Once our business relationship has ended, we will hold your customer records in our archive storage for at least 6 years from the date the relationship ends in line with our retention periods. After that period has elapsed, we will destroy your customer records securely and/or delete it from our electronic records. Once that has happened, your records will no longer be available.

Transferring your personal data outside of European Economic Area (EEA)

We will store your information within the United Kingdom and also in other countries outside of the EEA. We will ensure that appropriate safeguards are in place to protect that data. This may occur where we use cloud-based software products to process and store data, and those software providers have data centres outside of the EEA. Please contact us if you would like any further information

IF WE HAVE CAPTURED YOUR PERSONAL DATA IN OUR TEST DATA VIDEO FOOTAGE

Personal data that we may capture



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When we use our video cameras to capture test data for the purposes of testing our automatic vision software products, we will capture some personal data of members of the public who are in the areas within which we are capturing our test data.

Personal data is primarily in the form of vehicle registration numbers although on some occasions, we may capture live images of people. We will typically only capture a live image of a person if they walk past our cameras. Our footage does not typically capture images of people within vehicles, that are clear enough to personally identify them.

How we use your personal data

We capture this data so that we can test our automatic vision software products for which there is significant demand for. We need to use real data in order to ensure that our software products are fit-for-purpose.

This data is not used for any other purpose.

Please contact us if you would like more information about our legal basis for processing your personal data.

Legal basis for processing your personal data

We keep your personal data confidential and will not disclose it to third parties unless disclosure is:

- (a) Authorised by you.
- (b) Necessary for the performance of a contract.
- (c) Required by law.
- (d) Necessary for the purposes of our legitimate interests or those of a third party (in other words, we have a compelling justification for the disclosure).
- (e) Necessary to protect your vital interests or those of another person i.e. to protect a life.

Our reasons for processing your personal data will also fall into at least one of the five categories listed above.

We do not process any special categories of personal data for the purposes of capturing test data.

Holding your personal data

We hold personal data captured for test data in electronic form.

Retention and destruction of your personal data

We retain our test data until we no longer have a purpose to process it. We use our test data over and over again as it remains useful to test new or developed products to make sure that they still work with older footage. However, once we determine that we no longer need to use the data, we will archive the footage for 6 years, after which time it will be permanently deleted from our systems. Once that has happened, your information will no longer be available.

Transferring your personal data outside of European Economic Area



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We store all of our test data within the United Kingdom.

IF YOU ARE A SUPPLIER

Legal basis for processing personal data

We keep your personal data confidential and will not disclose it to third parties unless disclosure is:

- (a) Authorised by you.
- (b) Necessary as part of the services you are providing to us (performance of our contract with you).
- (c) Required by law.
- (d) Necessary for the purposes of our legitimate interests or those of a third party (in other words, we have a compelling justification for the disclosure or processing).
- (e) Necessary to protect your vital interests or those of another person i.e. to protect a life.

Our reasons for processing your personal data will also fall into at least one of the five categories listed above.

We do not process any special categories of personal data belonging to our suppliers.

Please contact us if you would like more information about our legal basis for processing your personal data.

How we use your personal data

We use your information primarily to receive services from you and manage our contract with you. We also use your information for: accounting and billing purposes; to comply with our legal obligations, and to manage our business effectively.

Sharing your personal data with third parties

We will not share your personal information with any third parties.

Contacting you

We may correspond with you by email if you provide us with an email address, unless you advise us in writing that you do not wish us to do so. You acknowledge that email may not be secure. Email will be treated as written correspondence and we are entitled to assume that the purported sender of an email is the actual sender and that any express or implied approval or authority referred to in an email has been validly given. Please be aware that the Company may monitor and read any email correspondence travelling between you and any mail recipient at the Company as part of its monitoring activities to ensure compliance with its Information Management and Security Policy.

We will aim to communicate with you by such method as you request. More often than not this will be in writing but may be by telephone if it is appropriate.



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Protecting personal data

The internet is not secure and there are risks if you send sensitive information in this manner or you ask us to do so. Please be aware that the data we send by email is not routinely encrypted.

We will take reasonable steps to protect the integrity of our computer systems by screening for viruses on email sent or received. We expect you to do the same for your computer systems.

Bank details

It is very unlikely that we will change our bank account details during the course of your matter. In any event, we will never contact you by email to tell you that our details have changed. If you receive any communications purporting to be from this Company, that you deem suspicious or have any concerns about (however slight), please contact our office by telephone straightaway.

Holding your personal data

We may hold your information both electronically and in paper format. We will use all reasonable measures to ensure that your information remains confidential and will advise you immediately if we believe that any of your information has been released.

Retention and destruction of your personal data

Once our business relationship has ended, we will hold your supplier records in our archive storage for at least 6 years from the date the relationship ends in line with our retention periods. After that period has elapsed, we will destroy your supplier records securely and/or delete it from our electronic records. Once that has happened, your records will no longer be available.

Transferring your personal data outside of European Economic Area (EEA)

We will store your information within the United Kingdom and also in other countries outside of the EEA. We will ensure that appropriate safeguards are in place to protect that data. This may occur where we use cloud-based software products to process and store data, and those software providers have data centres outside of the EEA. Please contact us if you would like any further information

YOUR RIGHTS

If you are an individual, you have the following rights under the General Data Protection Regulation (GDPR):

- (a) **Right to access personal data** – you can request details from us of the personal data that we hold about you.

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- (b) **Right to object to processing** – you can tell us that you want us to stop processing your personal data.
- (c) **Right to object to automated individual decision making including profiling** – you can object to us making decisions about you solely by using a computer system without any human consideration. We do not currently do this.
- (d) **Right to rectification** – you can ask us to correct personal data that we hold because you believe it is inaccurate.
- (e) **Right to erasure** – you can ask us to delete the personal data that we hold about you.
- (f) **Right to restrict processing** – you can tell us that you only want us to use the personal data for a specific reason.

Please note that these rights are not absolute rights (they are not rights that will be automatically granted), as we have to consider whether there are any reasons why we cannot meet your request. For example, we will not be able to delete data that we are legally obliged to keep. We will let you know if we are not able to meet your request and the reason why (where it is appropriate to disclose this information to you).

You also have the right to complain to the Information Commissioner's Office (ICO) if you are not happy with the way that we handle your personal data. You can contact the ICO at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or by calling the ICO's helpline on 0303 123 1113.

Please note that where you provide consent to us using your personal data, you are entitled to withdraw that consent at any time. You can do this by contacting our designated Data Protection Manager.

LINKS TO OTHER WEBSITES

This Privacy Notice does not cover any links to other websites that have been included on our website. Please read the Privacy Notices on the other websites that you visit.

CHANGES TO OUR PRIVACY POLICY

This privacy notice is reviewed regularly and was last updated in **October 2020**.