

Privacy Notice

Security Monitoring Centres Limited and its subsidiaries and affiliates (collectively, “**SMC**”), are committed to protecting the privacy of visitors to our websites (“**Websites**”) and users of our mobile applications (“**Apps**”). It is important that our users understand how we collect, use and disclose Personal Information (as defined below). SMC has implemented technical, administrative and physical measures to safeguard any personal information that we may collect.

This Privacy Notice describes our practices related to Personal Information collected through the Websites and Apps, unless there is a separate privacy notice for a particular website or mobile application.

SMC has a separate General Privacy Notice that covers Personal Information that SMC may collect and process separate and apart from its Websites and Apps. If you apply for a job through this Website, SMC’s use of the Personal Information you provide through the Careers section is governed by SMC’ Job Applicant Privacy Notice found in that Careers section, and not this Privacy Notice. SMC may use cookies and other tracking technologies on its Websites and Apps; please consult our Cookies Policy.

What Personal Information does SMC collect? How does SMC collect such Personal Information?

“**Personal Information**” is information through which a natural person is identifiable or may be identified. SMC collects, uses and processes your Personal Information in order to provide you with services, products or information that you request.

The collection of Personal Information will be transparent to you, and you will have the opportunity to decide whether or not to provide it. If you choose not to provide any of the Personal Information requested, SMC may be unable to complete your transaction, or provide the information, services or products you have requested.

SMC collects information, including Personal Information, from you when you submit a form or request, or register a product with SMC, such as: name, physical address, the company for whom you work, phone number, email address and fax number, as well as any other Personal Information you provide to SMC. SMC may also ask you to provide information about the product you are registering (e.g. a device identifier) or the person/company that installed or maintains it.

SMC may also collect information through your use of our Websites or Apps, such as device identifiers, IP address, log files, and location data. Please see “How does SMC use cookies or other tracking technologies?” below for more information.

Your mobile or internet services providers may have a conflicting privacy position or policy that permits them to capture, use and/or retain your Personal Information when you visit the Websites or use the Apps, but SMC is not responsible for and does not control how other parties may collect your Personal Information when you access the Websites or Apps.

Why does SMC collect your Personal Information?

Our purpose in collecting this information is to provide customized services and content relevant to your specific needs and interests. Your information may be used by SMC to carry out our contractual obligations, authenticate you as a user and allow you access to certain areas of our Website, Apps or social media sites or allow you to apply for a position at SMC.

Except where used in support of a contract with you or to fulfil a legal obligation, our use of your Personal Information will be only for legitimate business interests as set out below. Personal Information collected on the Websites or Apps may be used to:

Conduct basic business operations, such as communicate with customers and business planning;

Provide investor services.

- Provide requested information, items, or services;
- Respond to your request or further process your submitted form;
- Advertise products, services, promotions and events relating to SMC;
- Improve our products, services, Websites and Apps;
- Verify your identity to ensure security for one of the other purposes listed here;
- Analyze your behaviour on our Website and Apps;
- Respond to a legitimate legal request from law enforcement authorities or other government regulators.
- Obtain your location data in order to provide requested information or services;
- Protect against fraud or investigate suspected or actual illegal activity;
- Develop new offerings, improve the quality of our products, improve and personalize user experience, and better prepare future content based upon your interests and those of our general user population; or
- Conduct investigations to ensure compliance with, and comply with, legal obligations.

Where is Personal Information stored?

Because SMC is a global company with locations in many different countries, we may transfer your information from one legal entity to another or from one country to another within SMC in order to accomplish the purposes listed above. These countries include, at a minimum, the United States, the member states of the European Union, the United Kingdom, Switzerland, Canada, and other countries, including some in Asia. We will transfer your Personal Information consistent with applicable legal requirements and only to the extent necessary for the purposes set out above.

SMC relies on available legal mechanisms to enable the legal transfer of Personal Information across borders. To the extent that SMC relies on the Standard Contractual Clauses (also called the Model Clauses) or Binding Corporate Rules to authorize transfer, SMC will comply with those requirements, including where there may be a conflict between those requirements and this Privacy Notice.

Does SMC use your Personal Information to contact you?

SMC may use the Personal Information you provide to contact you about products, services, promotions, special offers, surveys, and other information that may be of interest to you. If you prefer not to receive such communications, please use the “unsubscribe” function within the Websites or Apps, or let us know by sending an email to privacy@smc-monitoring.com

SMC will ensure that any marketing communications sent by electronic means will provide a simple method for you to opt-out or unsubscribe. Please note that if you unsubscribe from marketing communications, you may continue to receive communications about our account or transactions with us.

We will also use your Personal Information to contact you in response to a direct inquiry or if you register to receive communications on any of the Websites, such as the Investors section if available.

Does SMC share the information it collects with third parties?

SMC may share your Personal Information with its affiliated companies and subsidiaries, such as companies in which SMC has control, through either direct or indirect ownership for the purposes set out above.

In addition, SMC will provide access to or share Personal Information on an as-needed basis with third parties, such as trusted service providers, consultants and contractors who are granted access to SMC facilities and systems or which provide services to SMC, and with government agencies and others as required by law. In particular, SMC will only share your Personal Information outside SMC to:

Service providers, dealers, distributors, agents or contractors that SMC has retained to perform services on our behalf. SMC will only share your Personal Information with third parties whom SMC has contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements;

- comply with legal obligations, including but not limited, to complying with tax and regulatory obligations, sharing data with labor/trade unions and works councils, and responding to a court proceeding or a legitimate legal request from law enforcement authorities or other government regulators;
- Investigate suspected or actual illegal activity;

- Prevent physical harm or financial loss; or
- Support the sale or transfer of all or a portion of our business or assets (including through bankruptcy).

Your Personal Information will also be maintained and processed by our service providers in the United States, the member states of the European Union, the United Kingdom, Switzerland, Canada, Asia, and in other jurisdictions, within an appropriate legal and contractual framework.

How does SMC secure Personal Information?

SMC is committed to ensuring the security and integrity of Personal Information. SMC has adopted reasonable physical, technical and administrative procedures to safeguard your Personal Information. However, due to the nature of Internet communications, we cannot guarantee or warrant that your transmission to us is secure.

How long do we keep your Personal Information?

The Personal Information you provide to SMC is only kept for as long as it is reasonably necessary for the purposes for which it was collected, taking into account our need to comply with contractual obligations, resolve customer service issues, comply with legal requirements and provide new or improved products and services to users. This means that we may retain your Personal Information for a reasonable period after you stopped using the SMC Websites or Apps. After this period, your Personal Information will be deleted from all systems of SMC without notice.

How can you correct, change or delete your information held by SMC?

You may request to access, update, correct, change, or delete your Personal Information at any time. SMC will use reasonable efforts to timely update and/or remove your Personal Information. To protect the user's privacy and security, SMC will take steps to verify the user's identity before making any requested access or change. To access, update, correct, change, or delete your Personal Information, to ask questions or to raise concerns regarding data protection and privacy, send an email to privacy@smc-monitoring.com Some of our Websites, Apps, and social media accounts allow you to make corrections directly at the site without need to further contact SMC.

Please note that while we will assist you in protecting your Personal Information, it is your responsibility to protect your passwords and other access credentials from others.

What should you understand about the third party links that may appear on this Website?

In some instances, SMC may provide links to non-SMC controlled websites, which SMC will make reasonable efforts to identify as such. SMC does not control such third party websites, however, and cannot be responsible for the content or the privacy practices employed by other websites. Furthermore, this Privacy Notice does not govern information collected about you by third parties.

How does SMC use cookies or other tracking technologies?

Cookies

SMC may use cookies on this Website. Cookies are small text files sent to and stored on users' computers. We use cookies to allow the Website to recognize repeat users, facilitate users' access to the Website, and allow the Website to compile aggregate data that will allow content improvements. Cookies do not damage users' computers or files. If you do not want cookies to be accessible by this or any other SMC Website, you should adjust the settings on your browser program to deny or disable the use of cookies. However, denying or disabling cookies or similar technology may prevent you from accessing some of our content or using some of the features on the Website. SMC may also use cookies and similar technology placed by one of our business or advertising partners to enable SMC to learn which advertisements bring users to our Website.

In addition, SMC monitors user traffic patterns throughout its Websites according to a user's domain name, browser type, date and time of access, and pages viewed. Our Web servers collect the domain names but not the email addresses of visitors. This information is collected in order to measure the number of visitors to our Website and to determine which areas of the Website users find useful based upon the amount of traffic to particular areas. SMC uses this information to enhance users' experience at the Website and to better prepare future content based on the interests of users.

Web Beacons

This Website may also use web beacons. A web beacon is usually a pixel on a website that can be used to track whether a user has visited a particular website to deliver targeted advertising. Web beacons are used in combination with cookies, which means that, if you turn off your browser's cookies, the web beacons will not be able to track your activity. The web beacon will still count as a website visit, but your unique information will not be recorded.

Information collected by web beacons may include IP address information (see below). Web beacon information is also used for:

- Advertising and email auditing, and reporting;
- Personalization;
- Site traffic reporting; and
- Unique visitor counts.

IP Addresses

An Internet Protocol (IP) address is a number that is used by computers on the network to identify your computer every time you log on to the Internet.

SMC may collect and keep track of IP addresses to, among other things:

- Maintain Website safety and security;
- Restrict access to our Websites to certain users;
- Troubleshoot technical issues; and
- Better understand how SMC Websites are used.

Log Files

SMC (or third parties on behalf of SMC) may collect information in the form of log files that are recording Website activities and statistics about web users' habits.

Log files are used for internal purposes only. By using log files, SMC can constantly improve and customize their Websites and applications.

The entries help us gather, among other things:

Internal marketing and demographic studies;

- A user's browser type and operating system;
- Information about a user's session (such as the URL, the date and time our Website was visited and which pages and for how long were viewed on our Website); and
- Other similar navigational or click-stream data.

Social Network Information

Social network information is any information that you permit a third party social network to share with third party application developers such as SMC. Social network information includes any information that is part of your profile on a third party social network. Such social network may include, but is not limited to, Twitter, Facebook, google+.

To find out how your information from a social network may be obtained by us (or other third party application developers), please go on the settings page of the relevant social network. Furthermore, you acknowledge that we may use your Personal Information to match information with a social network for advertising purposes.

SMC cannot make assurances about the security of information that you share with third parties, including information you share with social media sites.

How may SMC use location data?

SMC is a global provider of fire safety and security services. As such, the following are some examples of when location data may be requested to provide some of the services that SMC has to offer:

To improve building product capability, such as use your location data in one of our buildings to dynamically adjust ventilation, heating and cooling settings, to turn the lights on or off, or to unlock doors;

- If you are a visitor to or an employee at our headquarters, use your location data to help you locate the nearest printer or conference room, in order to provide an enhanced experience at our headquarters; or
- To determine which service technician is closest to a service call. In addition, SMC may use location data for location and/or timekeeping purposes for employees or contractors.

In all of these cases, SMC will ask permission to collect your location data and so the collection of this data will be transparent to you – you will have the opportunity to decide whether or not to provide your location data. If you choose not to provide your location data, SMC may be unable to provide the requested service or complete the requested transaction.

What additional information should specific users know?

Parents, Guardians, and Children: Our Apps and Websites are intended for visitors who are at least 18 years of age, or the age of majority in their jurisdiction of residence. SMC does not knowingly solicit information from, or market products or services to, children. If you do not meet the age requirements set out above, please do not enter your Personal Information on this or any other SMC Websites or Apps.

Users from the European Union and other countries with privacy laws: You have the right to lodge a complaint with your national or state data protection authority, which may also be known as a supervisory authority. You also have the right to: (i) request access to and correction or erasure of your Personal Information; (ii) seek restrictions on; or (iii) object to the processing of certain Personal Information, and seek data portability under certain circumstances. To contact SMC about a request to access, correct, erase, object or seek restrictions or portability, please use the contact methods indicated at the end of this notice.

Users from the US: SMC does not collect Social Security Numbers through its Websites.

How might SMC change this Privacy Notice?

As SMC expands and improves its Websites and its Apps, or as legal requirements change, we may need to update this Privacy Notice. This Privacy Notice may be modified from time to time without prior notice. We encourage you to review this Privacy Notice on a regular basis for any changes. The date of the latest version will be identified at the bottom of the policy.

How can you contact SMC?

If you have any comments or questions or if there are other things we can do to maximize the value of this Websites, please email the SMC webmaster.

If you wish to access, correct, update or erase your Personal Information, or if you have questions about SMC's privacy practices in general or a complaint, please email privacy@smc-monitoring.com

In the event that you are located in a country that is governed by the General Data Protection Regulation and would like to contact the local Data Protection Officer, please note that in your email and your inquiry will be directed to the appropriate person. If you wish to opt-out from sharing your Personal Information with us or have your Personal Information be removed, you should follow this link.

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