



Privacy Policy

This privacy policy (the “**Privacy Policy**”) describes how RISCO Ltd. and/or its affiliates (“**RISCO**,” “**we**,” “**our**” or “**us**”) process personal data we collect from you, or that you provide to us, in relation to your use of our Service. We process personal data with due care and in accordance with the applicable data protection laws and regulations.

Our Services are provided either directly to you, as a user, or by third party service providers such as Installers or Monitoring Stations. If you are a customer of a third-party service provider, your information will be processed by RISCO acting as a data processor and your service provider will act as data controller and will be responsible for compliance with any applicable data protection and/or privacy laws in the handling of your personal data. You should refer to your service provider's privacy policy for more information on its privacy practices.

1. Definitions

In this Privacy Policy, the following terms shall have the following meanings:

- 1.1. “**Installer**” means anyone who sells, installs and/or maintains RISCO products.
- 1.2. “**European data protection law**” means the EU Regulation 2016/679 General Data Protection Regulations, as amended, consolidated or replaced from time to time.
- 1.3. “**Monitoring Station**” means an entity selected by you to provide services of monitoring for fire or intrusion occurrences through RISCO Cloud.
- 1.4. “**personal data**” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 1.5. “**processing**” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.6. “**Service**” means any of the following, which are owned, operated, licensed, and/or controlled by RISCO: (i) RISCO’s websites, including without limitation, the websites located at the following domain addresses: <https://www.riscogroup.com>, <https://alarm.riscogroup.com>, <https://riscocloud.com> (ii) RISCO’s software applications, available to download to your mobile telephone or handheld device (including without limitation, iRISCO, Handy App, Free Control, or any other RISCO mobile application); (iii) RISCO Service Platform (AN RSP); (iv) any other RISCO’s websites, apps, platforms or products that do not have a separate privacy policy or that link to this Privacy Policy; and/or (v) any services available through any of the abovementioned.

2. What information does RISCO collect and how is this information used?

2.1. Contact Information

When you contact us through our online ‘Contact Us’ form, we process the contact information that you provide to us, including your name, business/company name, phone number, email address and country of residence.

This contact information may be processed for the purposes of communicating with you, responding to enquires or requests from you for additional information about RISCO, its products and/or services or for any other pre-sale marketing inquiries. We also use this contact information to monitor customer/potential customer communications. You do not need to provide this information to us but if you do not, we will not be able to open your account or respond to your communication.

2.2. Marketing Messages and Notifications

When you register online or sign up to become a RISCO customer through our ‘Create New Account’ or any similar form or when you choose to subscribe to our Marketing messages or notifications, we process the contact information that you provide to us, including your name, business/company name, phone number, email address, country of residence and mailing address.

This contact information may be processed for the purpose of sending you from time to time (by email, SMS text messages, push notifications to your mobile device, telephone, post or other electronical means) marketing information about



RISCO and/or its products and services which may be of interest to you, such as newsletters, offers, marketing brochures, product launches, technical updates, promotions and more (“**Marketing Notifications**”).

You may withdraw your consent to receive Marketing Notifications from us by contacting us using the details in Section 12 or through our online ‘Contact Us’ form, available at: <https://www.riscogroup.com/content/contact-gdpr> or by following any instructions we may include in the Marketing Notification we send to you (for example, an unsubscribe or opt-out mechanism will appear at the foot of any Marketing Notification we send you).

2.3. Customer Relationship

When you contact us through our online ‘Contact Us’ form with a post-sale inquiry or when you interact with our customer support representatives via email, telephone or in person, we may process your contact information, such as your name, business/company name, phone number, email address, and country of residence; and we may also collect information about the RISCO products or services you or your employer or a third party has purchased.

We use this information for purposes of managing our relationships with customers, communicating with customers and to provide customer support.

2.4. Visitor’s Usage Log Information

We may process information about anyone who visits our Services (“**usage data**”) by using “cookies”. This usage data includes, but is not limited to, a visitor's IP address (a computer's numerical Internet address), the websites from which visitors access our Service, the type and version of web browser used to access our Service, the device used to access our Service, the device's unique identifier, operating system, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your Service use.

This information may be processed for the purposes of analysing the use of our Service.

You may restrict our use of Cookies. For more information about cookies, see our Cookie Policy at: <https://www.riscogroup.com/content/terms-and-conditions-legal>

2.5. Data We Process on Behalf of Installers or Monitoring Stations

When using our Services, you or your chosen Installer or Monitoring Station may provide us with certain information regarding your alarm system (such as model of alarm system panel installed, number of cameras installed, number of smart devices installed, number of NVRs (Network Video Recorders) installed, Number of VDBs (Video Doorbells) installed, equipment versions, versions updates dates, name of Monitoring Station serving you, account information and device settings) in order to help us provide you with our Services or help us improve our Services. RISCO may also receive personal data that you have provided to our partners, including user profile information, to enable RISCO to provide our Services.

RISCO may process information regarding your use of the Services on behalf of you, your Installer or Monitoring Station, including but not limited to performance of any security or other device and alert logs. We receive this type of information from your devices that are connected to our Service and your computer or other electronic device through which you may access, browse, download, receive, or otherwise use the Service and we may also receive and collect such information from your Installer or Monitoring Station.

2.6. Video and Audio Data

When you use our Services for video monitoring or otherwise use our Services to connect a camera or another device that is capable of recording video and/or audio, you may enable us and/or an Installer and/or a Monitoring Station to record, store, view and process video and/or audio recordings from your monitoring equipment. This may include capturing and sending to you portions of this data as part of a notification or analyzing the data to identify motion or other events. We may process information from your monitoring equipment so that we or your Installer or Monitoring Station can send you alerts. In addition, we will capture, process and store video and/or audio data recordings from your device for a limited period of time and you may be able to access those recordings.

Data protection and privacy laws in your country may impose certain responsibilities on you regarding your use of security cameras and other devices with recording capabilities. You are responsible for ensuring that you comply with any applicable laws. For example, you may need to display a notice that alerts visitors to your home or business that they may be recorded using security cameras and other devices with recording capabilities. RISCO takes no responsibility for your compliance with these laws.

2.7. Legal Requirements

We will also disclose personal data (1) in response to lawful requests by government or regulatory authorities; and (2) in our sole discretion if we believe that such disclosure is appropriate in connection with an official government or



regulatory investigation or in response to a perceived significant threat to a person's health or property.

We may also process any of your personal data identified in this Privacy Policy where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. We will not delete personal data if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.8. Legal Bases for Processing Personal Data

We will only collect and process your personal data where we have a legal basis. Our legal bases include: (i) consent (where you have given consent), (ii) performance of a contract (where processing is necessary for the performance of a contract with you), and (iii) legitimate interests, such as our interest in managing our relationships with you or improving our products and Services. Where we rely on legitimate interests, we will not do so where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

3. How we share your personal data?

- 3.1. We may share any or all of your personal data with any member of the RISCO group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries and/or its affiliates) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this Privacy Policy.
- 3.2. We may sometimes contract with third parties to supply products and/or services to us and/or to you on our behalf, such as with suppliers, subcontractors, distributors, vendors or installers that assist us in distributing, selling, marketing, customer service, integration services, customer support, cloud hosting and other services. Such service providers are required by contract to keep confidential and secure the information received on our behalf and may not use it for any purpose other than to carry out the services they are performing for us. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.
- 3.3. We may compile statistics about the use of our Service including data on traffic, usage patterns, user number, sales and other information. All such data will be anonymized and will not include any personally identifying data, or any anonymized data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective affiliates, partners or advertisers. Data will only be shared and used within the bounds of the law.
- 3.4. In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.

4. What happens if our business changes hands?

We may from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Where permitted by law, any personal data that you have provided to us will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.

5. Retaining and deleting personal data

- 5.1. This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 5.2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes for which that data is collected, held and processed, and as permitted or required by law.
- 5.3. Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. All such retention will be subject to the implementation of appropriate technical and organizational measures to protect the rights and freedoms of data subjects, as required by applicable law.



6. Where does RISCO store your personal data?

6.1. We store your personal data is stored in the following locations:

- 6.1.1. Personal data submitted for marketing purposes through our web site or through the HandyApp application is stored on third-party servers operated by xGlobe server farm, located in London, UK.
- 6.1.2. Personal data of users of the Risco Cloud website (<https://riscocloud.com>) and/or of the iRisco or FreeControl applications are stored on third-party, Microsoft Azure servers , located in the Netherlands with a disaster recovery site in Ireland.

6.2. Your personal data may be transferred to a country outside the European Economic Area (EEA consists of all EU member states, plus Norway, Iceland and Liechtenstein), which the European Commission has made an "adequacy decision" with respect to the data protection laws of such country. We will take all steps to ensure that any personal data which is transferred to country outside the EEA is treated as safely and securely at the same levels of protection as it would be within the Netherlands or Ireland and in accordance with the applicable European data protection law.

7. How does RISCO protect the security of your personal data?

- 7.1. We implement and maintain reasonable and appropriate technical and organizational security measures to protect the personal data we process, from unauthorized access, alteration, disclosure, loss or destruction.
- 7.2. Should despite of our security measures, a security breach occur that is likely to result in a risk to the data privacy of a data subject, we will inform the relevant data subjects and other affected parties, as well as relevant authorities when required by applicable European data protection law, about the security breach as soon as reasonably possible.

8. The rights you have over your personal data

8.1. We have listed below the rights you have under the European data protection law with respect to your personal data. You should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights:

- 8.1.1. The right to be informed about our collection and use of personal data (see Section 8.2);
- 8.1.2. The right of access to the personal data we hold about you (see Section 8.2);
- 8.1.3. The right to rectification if any personal data we hold about you is inaccurate or incomplete;
- 8.1.4. The right to be forgotten (see Section 8.3);
- 8.1.5. The right to restrict the processing of your personal data (see Section 8.4);
- 8.1.6. The right to data portability (obtaining a copy of your personal data to re-use with another company);
- 8.1.7. The right to object us processing your personal data for particular purpose;
- 8.1.8. Rights with respect to automated decisions making and profiling; and
- 8.1.9. The right to withdraw consent (see Section 8.5).

8.2. You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data in accordance to the European data protection law. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

8.3. In some circumstances you have the right to ask us to delete any personal data we hold about you without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

8.4. In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been



restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

- 8.5. To the extent that the legal basis for our processing of your personal data is consent (e.g., for marketing purposes), you have the right to withdraw that consent at any time. If you withdraw your consent, we will cease to process your personal data for this purpose, but such withdrawal will not affect the lawfulness of processing before the withdrawal. If the processing is not based on consent, you have the right to object to the processing.
- 8.6. If you would need assistance or would like to exercise any of your aforementioned rights, you may contact our Data Protection Officer at: Risco-dpo@riscogroup.com or by using the contact details as described in Section 12 below.
- 8.7. If you have any cause for complaint about our use of your personal data, please contact our Data Protection Officer at: Risco-dpo@riscogroup.com or by using the contact details as described in Section 12 below and we will do our best to solve the problem for you. If we are unable to help, you also have the right to make a complaint to the applicable data protection supervisory authority (if in the UK is to the Information Commissioner Office advice bureau at www.ico.org.uk, if in the Netherlands to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) at <https://autoriteitpersoonsgegevens.nl/en> and if in Ireland to the Data Protection Commission at <https://www.dataprotection.ie/>).

9. Third Party Websites

- 9.1. This Privacy Policy applies only to your use of our Service. Our Service may contain links to other websites neither owned nor managed by us. Please note that we have no control over how your data is collected, stored, or used by other websites and we encourage you to review the privacy policies of any such websites before providing them of or allowing the collection of your personal data. The personal data you choose to provide to or that is collected by these third parties is not covered by our Privacy Policy. We would like to emphasize that we are not responsible for the content or the privacy policies of websites to which our Service may link or websites that link to our Service.

10. Our Service are not intended for Children

Our Service and apps are meant for adults. We do not knowingly collect personal data from children. If you are a parent or legal guardian and think your child has given us information, you can contact us.

11. Changes to our Privacy Policy

We may change this Privacy Policy from time to time by updating this page and publishing a new version on our Service. If this happens, we will post a notice on our Service that changes were made in our Privacy Policy and we will change the "Last Updated" date at the top of this Policy. Any such changes will become binding on you on your first use of our Service after the changes have been made. Therefore, following such notice, we highly recommend that you check this revised policy, to ensure that you are happy with any changes.

12. Contact Us

If you have any questions with regards to this Privacy Policy or requests concerning your personal data, please contact us by email at Risco-dpo@riscogroup.com or through our online 'Contact Us' form, available at: <https://www.riscogroup.com/content/contact-gdpr>

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