

## Privacy Policy

### Introduction

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data (including sensitive information) and how we will deal with it. When we refer to personal data we mean as defined in the Data Protection Act 2018 ('the DPA') and The General Data Protection Regulation ((EU) 2016/679) ('the GDPR'), '.

By visiting <https://www.realsafetechnologies.com> (the 'Website') or the Triumph SOS mobile application (our 'App') you accept and consent to the practices described in this Privacy Policy including the processing of your personal data under this lawful basis.

### Who We Are

More formally, we are Realsafe Technologies Limited. We are a company registered in England and Wales with Company number 08120770 and our registered office is at Northern Design Centre, Abbott's Hill, Baltic Business Quarter, Gateshead, England, NE8 3DF.

We are registered with the Information Commissioners Office under registration number Z3279705 and you can view more details of our registration by visiting the ICO's website [here](#).

For the purposes of the DPA and in-line with the GDPR, Realsafe Technologies Limited is the Data Controller.

If you have any concerns about the way we use your information or any questions about this Privacy Notice, please let us know. We can be contacted via email at [support@realsafetechnologies.com](mailto:support@realsafetechnologies.com) or you can write to us at the address above or contact us using the Get In Touch feature on our Website.

Any reference to the 'Services' in this Privacy Notice refers to the commercial services that we offer to our customers subject to this Privacy Notice and our Terms of Service and as are outlined on the Website and the App.

### What we do with your information

Under the Data Protection Legislation, we can only use your personal data if we have a proper reason for doing so, for example: consent, contact, legitimate interests, or legal obligation.

1. **Consent.** Generally, we do not rely on consent as a legal basis for processing your personal data other than to:
  - place cookies and similar tracking technologies on your device including third-party cookies (for further details please see the "Our Cookie Policy" section below); and
  - send you our blogs, newsletters or other electronic marketing communication if you are not our existing customer or if you request or expressly agree to receive such communication.

Where your permission is required, we will clearly ask you for such consent separately from the body of this privacy notice.

You have the right to withdraw consent by:

- emailing us at [support@realsafetechnologies.com](mailto:support@realsafetechnologies.com) ;

- changing your privacy settings within your account on our website or app;
- in case of marketing emails, by using the 'unsubscribe' link in our marketing emails; or
- in case of cookies, by using the cookie preferences settings on our website.

Even if we are not required to obtain your consent for marketing purposes, you can still opt-out of receiving marketing communications at any time, so you are still in control.

From time to time, we may ask you to confirm or update your marketing preferences.

**2. Contract.** We will use your personal data if we need to do it to perform our obligations under a contract with you, or if it is necessary for a contract which we are about to enter with you. For example, if we need to:

- register you as a new customer and administer your account (e.g. set up your subscription, manage your orders, administer invoicing and payments);
- provide our products/services to you;
- manage our relationship with you (e.g. to respond to your enquiries, to notify you about changes to our products/services, or to take your feedback on our products/services);
- assist in and administer the provision of services to you, including the transmission to the emergency services of location and identification data and any medical data you choose to store in the Triumph SOS app in the event that the crash detection function is triggered;
- if we run a competition and you are a prize winner, to administer the prize and to publish or otherwise make available a list of prize winners; or
- provide after sale care services (e.g. technical support).

**3. Legitimate interests.** We may process your personal data when we (or a third party) have a legitimate reason to use it, so long as this is not overridden by your own rights and interests. For example:

- to administer and protect our business and our website/app/portal (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- to manage your account and our relationship with you;
- to manage payments, fees, charges, and to collect debts which you may owe to us;
- to interact with you professionally (e.g. if you represent our current or prospective customer, supplier or business partner) to manage our relationship with the organisation you represent;
- to deal with your enquiry unrelated to a contract which we may have with you;
- to provide you with a free service (e.g. a free trial or the use of the functionalities of our website/app/portal);
- to ask you to leave a review or complete a survey;
- to send you our email updates or other electronic marketing communications if you are our existing client;
- to increase our business or promote our brand through delivering relevant website/app/portal content, advertisements, and marketing communications to you;
- to measure or understand the effectiveness of the advertising we provide to you;
- to improve our website/app/portal, products, services, marketing, and customer relationships;
- for the prevention and detection of fraud and spam; or
- for the establishment, exercise or defence of our rights under our contract with you and/or legal claims.

**4. Legal obligation.** We may process your personal data to comply with our legal obligation. For example, to:

- notify you about changes to our terms or privacy notice;
- address your complaint; or

- comply with a request from a competent authority.

### Information we collect from you

We will collect and process the following information about you:

Information you give us - this is information about you that you give us by filling in forms on our Website, our App or by corresponding with us by phone, email or otherwise. It includes information you provide when you sign up to a subscription through the Website or App. We only request from you the minimum data required for you to use our service.

To sign up to our Services we will ask you for your email, your full name, date of birth and your city. You may also want to upload a profile picture to supplement your account information too.

You will also have the option to supplement your profile by adding medical data to your profile on our App. Adding medical data will allow you to take full advantage of the Services that we offer. We will at no point have any access or be able to view any of your medical data, this data will be passed securely directly onto the 999 services.

Information we collect about you – Whenever you visit our Website and our App we may automatically collect the following information:

technical information - including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Access to your GPS location is an essential part of the Services that we deliver and therefore we will also collect this from you (with your permission).

information about your visit - this includes the full Uniform Resource Locators (URL), clickstream to, through and from our Website (including date and time), pages you have visited, page response times, download errors, length of visits to certain page and page interaction information (such as scrolling, clicks, and mouse-overs).

Information we receive from other sources - This is information we receive about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data if we intend to share those data internally and combine it with data collected on this Website. We will also have told you for what purpose we will share and combine your data. We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

### Where we hold and what we do with your information

The information and content held on our Website is deployed geographically to maximise user experience. All information that could identify individuals within the European Union is stored exclusively within the European Union.

We will never share your user information with third parties for promotional purposes.

Our website is hosted by Microsoft Azure who are contracted by us for the provision of technical services. We remain responsible at all times for the security of your information, but if you want to know more about how we interact with Microsoft you can view their Privacy Notice, amongst their other policies [here](#).

Our email marketing is delivered to you by MailChimp and you can view more information about MailChimp and how they handle personal data by visiting their website [here](#).

We may also disclose your information to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

#### What we do to ensure the security of your personal information

We take the security of your personal data very seriously. Our approach to information security is constantly evolving and continually reviewed.

We have adopted industry best practices from both technological and business process perspectives in order to make the security of your data a key part of the way we do business.

All our customer data and data collected through the Website or the App is stored on our SSL secured servers.

We have policies and practices in place that not only ensure our compliance under the DPA but also the GDPR, including training and adequate procedures put in place for any staff that handle or have access to sensitive information.

#### Your rights regarding your personal information

We may contact you via email, SMS or push notification with updates about the services that we offer or any changes that we have made to our Website.

*You can opt in or out at any time by clicking the 'Unsubscribe' link in our emails.*

*To control and turn push notifications on or off on mobile, open the Triumph SOS app and tap on Profile in the navigation bar. Click on settings and notifications to control the notifications you would like to receive.*

You can amend all of your communication preferences at any time through the App.

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which our service may be advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we are not responsible or liable for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

#### Your Rights

You have the right to find out about what information we hold about you. You can exercise that right by contacting us and we will send you any request for information in a suitable electronic form within 20 working days. To make a request for information please contact [support@realsafetechnologies.com](mailto:support@realsafetechnologies.com) and a member of our team will be in touch.

If your personal data is incorrect then you have the right to rectify this information and ensure that it is accurate and up to date. If your data is incorrect then please contact us at the email address above and a member of the team will rectify this on your behalf.

You have the right 'to be forgotten' and to have your personal identifiable information permanently deleted from our systems. Again, if you would like to exercise this right then please contact us at [support@realsafetechnologies.com](mailto:support@realsafetechnologies.com).

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information

There will be no charge made for reasonable electronic access to your information, your right to rectification, your right to be forgotten from our systems or to transfer your data to another service provider.

#### How long we hold your information for

At Realsafe Technologies we have procedures in place to regularly review every 12 months what personal data we hold. If you have not interacted with us or accessed our services during this or the subsequent period then we will delete your personal data from our systems, but will send you an email first informing you of our intention to do so. Of course, you have the right to forgotten at any point and can find out more about this in the 'Access to Information' section above.

#### Changes to this Privacy Notice

Any changes we may make to our Privacy Notice in the future will be posted on this page. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of our Website and App.

#### Our Cookie Policy

If you'd like to manage your use of cookies or completely turn them off, then you can find out how to do so by using the link [here](#). Please note that if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our Website.

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our site. By continuing to browse the Website, you agree and consent to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

As part of our overall approach to privacy and transparency, this section describes what cookies are in the context of our web and mobile interfaces, and what their use means to you. At the end, we've included some links to help you research cookies and their impact, and how you can use your web browser to control the way it manages cookies.

We use the following types of cookies:

- Strictly necessary cookies - these are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of e-payment system.
- Analytical/performance cookies - these allow us to recognise and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.

- Functionality cookies - these are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies - these cookies record your visit to our Website, the pages you have visited and the links you have followed. We will use this information to make our Website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose but these cookies will contain no information capable of identifying you personally to us.

You can find more information about the individual cookies we use and the purposes for which we use below:

#### Google Analytics

We use Google Analytics to understand general trends about our content and traffic sources; for example, where users come from, which pages are most popular, which sites provide most traffic, how our marketing efforts impact the amount of visits we receive.

Google's statement about privacy can be found [here](#).

#### Twitter button

The Twitter button allows our users to share our platform and services with their followers more easily.

Twitter's privacy policy states they use cookies "to collect additional Website usage data and to improve our Services" – You can read the policy in full [here](#).

#### More information about cookies

Still don't know what cookies are? Then why not follow the link conveniently located [here](#) which provides more information about what they are and how they work.

#### Contact the Information Commissioner if there is a problem

If you consider we have not addressed your problem, you can contact the UK Information Commissioner's Office for assistance. Further information can be found [here](#).