



uWatch Ltd

Mill Brook House  
Caps Lane, Cholsey  
Oxfordshire, OX10 9HF, UK  
+44 1491 651229 +44 7808 061199  
ng@uwatch.co.uk

## UWatch Privacy Policy

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Uwatch Ltd including Bee.watch treats the privacy of our customers and website users very seriously and we take appropriate security measures to safeguard your privacy. This Policy explains how we protect and manage any personal data<sup>1</sup> you share with us and that we hold about you.

### How we obtain your personal data

#### Information provided by you

You provide us with data when you purchase one of our products online or by telephone or register online to use one of our products. This includes name, address, email address, telephone number, date of birth. We may also keep information contained in any correspondence you may have with us by post or email or records of telephone calls .

#### Information from other sources

We may use legal public sources to obtain information about you, such as contact details that are publicly available.

### Why we collect and how we handle your personal data

You can access and browse our website without disclosing your personal data. There are pages on the website and in our apps that invite you to send us information in order to purchase or register products and secure information and advice, or to tell us what you think about particular issues. uWatch Ltd takes great care of any personal information you give us in this way and we set out here how any personal information you give us is treated.

If you choose to give us information about yourself you will be consenting to the collection, processing and storage of the information you provide.

uWatch needs your personal details for the following reasons:

| Information stored | Reason for storage |
|--------------------|--------------------|
|--------------------|--------------------|

<sup>1</sup> Personal data means any information that may be used to identify an individual, including but not limited to, a first and last name, a home or physical address and an email address or other contact information.

Secured by Design



Official Police Security Initiative



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EORI No. GB210975616000  
VAT No. 210 9756 16

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|---|--|
| Contact details<br>Name, address, email, telephone                            | In order to send you products and to provide support for our products<br><br>The bee.watch app enables swarm collectors to collect swarms that you report on or near your property             |
| Financial details   | uWatch uses accredited organisations for online purchases please see Appendix A below.<br><br>uWatch only stores date and time and value of financial transactions for accounting purposes.    |
| GPS location  | To track lost items, to enable pesticide users to notify beekeepers of pesticide use in the bee.watch system.  |
| Personal items stored in the uWatch inventory – asset images and alert images | A function of the system that enables users to store essential information. Access to images is only available to the individual account holder, unless they chose to forward or publish them. |

You always have the option of declining to give us personal information or data, this may mean that you are unable to use our products and services.

uWatch Ltd ensures that only staff that have a business reason to look at your information or data can do so, they cannot look at your information or data for personal reasons or out of curiosity. uWatch Ltd may employ other companies and individuals to do work which may mean they have access to some personal information or data but they have the same restrictions as our own staff and are never allowed to use it for any other purpose.

uWatch will provide your contact details to registered swarm collectors in order that they can contact you to retrieve a honeybee swarm. With this exception, uWatch Ltd will never sell personal information or data or share personal information or data with third parties unrelated to the services we provide unless we are required to do so by law. Otherwise we will only disclose your information with third parties with your express consent.

Information you provide will be stored by uWatch Ltd and used to process your product purchase requests and support you in their use; the information will be retained for a reasonable period. Where a business transaction is enacted commercial records may be retained for up to seven years. We will take steps to ensure that your information is kept as safe as possible, and that it is always accurate and up to date. Should you have any concern regarding collection, processing, storage or disclosure of information submitted via our websites please contact us.

UWatch Ltd has no way of knowing if any person providing information through our website is who they say they are. uWatch Ltd will assume all information is genuine and cannot be held responsible for any action taken as a result of us relying on it. If you have any reason to think someone has provided information to uWatch Ltd using your identity please let us know and we will correct or delete the information. You have the right to request us to remove personal data from our website at any time. To do so, please contact us.

Details of our system security are provided in Appendix A.

## Interactive areas

Our website may include bulletin boards, discussion groups and other public areas that allow feedback and interaction between users. uWatch Ltd does not control the information posted to these areas but it does expect contributors to comply with the following rules and to any additional rules that may be introduced for a particular forum (the need to register for instance).

uWatch Ltd may delete, move or edit any messages it deems unsuitable without giving a reason. You are solely responsible for the content of your messages and agree to indemnify uWatch Ltd for any loss that we may suffer because of your action.

By submitting messages to our site you are giving uWatch Ltd the right to reproduce, adapt, make available, distribute and sub-license the message in whole or in part and in print or electronic form. Any message you post must not:

- contain advertising for goods or services or try to make business use of the site
- contain anything unlawful, threatening, abusive, libellous, indecent
- mislead others about who has posted the message
- use language that offends in any way, in particular anything that is of a racist, sexist, nationalistic, cultural or religious nature
- contain a virus or any other harmful software.

## **Cookies**

A cookie is information stored in a file placed on your computer's hard disc through your web browser. Your browser allows you to decide if you want to accept cookies or not. There are two types: session cookies and persistent cookies. Session cookies are temporary and are cleared out by your browser when it shuts down. They are used to remember you as you interact with the site on a single visit. Persistent cookies last for a longer period of time which depends on the lifetime of the cookie and is stored as part of the cookie file. Typically they are used to remember information on a return visit. Further explanation about cookies is available from [www.allaboutcookies.org](http://www.allaboutcookies.org).

No cookie placed by uWatch Ltd will contain personal information or card numbers and our cookies will not be used to collect such information from your computer. Refusing to accept a cookie will not stop you visiting our web site.

## **How long we keep information about you**

We keep information for as long as you are using our products and services and for a period of 6 months thereafter in case you should renew your contract.

## **Your rights**

The General Data Protection Regulation (GDPR) grants you the right to ask for a copy of the personal information or data we hold about you. This is referred to as a data access request. You will be asked to verify your identity. We shall respond promptly to any request, and certainly within one month from the point of receiving the request and all necessary information from you. We will provide the data in a commonly used and machine readable format.

Our formal response will include details of the personal data we hold about you, including:

- Sources from which we acquired the information
- The purposes for holding the information
- Persons or entities with whom we are sharing the information.

We will tell you if your personal information is lost and if as a result, your privacy and rights may be at risk.

### **Right to correction and removal of data**

If the information we hold about you is wrong or incomplete you can ask us to correct it or remove it without undue delay.

We will communicate any correction or removal of personal data to each recipient to whom the personal data has been disclosed, unless this proves impossible or involves disproportionate effort. We will provide you with information about those recipients if you request it.

### **Right to object**

You have the right to object, on grounds relating to your particular situation, at any time to the processing or sharing of personal information. We do not carry out any automated processing which may lead to an automated decision based on your personal data.

### **Accuracy of information**

We need to keep accurate personal data about you, We take reasonable steps to ensure the accuracy of any personal data we obtain. We also consider when it is necessary to update the information and you can help by informing us of changes when they occur.

### **Policy changes**

This policy is regularly reviewed and we may update, modify or amend it. We suggest you review the Policy from time to time to ensure you are aware of any changes we make, however we will not significantly change how we use information you have already given us without your prior agreement.

If you have any questions which are not answered by this privacy policy please contact us.

You also have the right to appeal to the Office of the Information Commissioner which is the UK supervisory authority for data protection issues. Tel no. 0303 123 1113 Website: [www.ico.gov.uk](http://www.ico.gov.uk)

## **Appendix A System Security**

### **General**

Users: Each user is provided with secure access to the uWatch Management and Communication System (MCS) through the Web page

Passwords: Your passwords are not able to be displayed or accessed by others.

Our data storage and retrieval system meets the police 'Secured by Design' standard.

## **Servers**

Our Web site can be accessed by casual users to make purchases and is hosted on its own Web server.

The MCS which controls the day to day functions of registered users is hosted on a second server.

- The hosting company is ISO27001 certified.
- "SSL Certificates" is implemented.

## **Financial transactions**

All transaction processing is handled by WooCommerce and through First Data payment gateway and is retrievable via their API's. WooCommerce, based in South Africa, complies with the Payment Card Industry Data Security Standards (PCIDSS).

No personal financial information is stored by uWatch except the date and time and value of financial transactions.

## **SIM and APN**

In the uWatch Cube the SIM (Subscriber Identity Module) has a unique APN (Access Point name) which is hard coded into the Cube firmware. No other SIM can work in uWatch Cubes and no uWatch SIM can work in another GSM device.

## **Bluetooth.**

The Bluetooth Tags use uWatch's own- communication protocol.

## **Software Development and Management**

uWatch software development is carried out in India by Virtual Employee, this company has stringent security measures in place for data security which meet the EU GDPR requirements, information is available on their website.



