

UWatch Ltd & Bee.Watch Privacy Policy

April 2018

Uwatch Ltd and including its trading name 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 data¹ you share with us and that we hold about you. In this policy uWatch, we/us means uWatch Ltd.

1 How we obtain your personal data

We may collect your personal information when you, for example:

- Buy, use or register for any of our products and services
- Subscribe to newsletters, alerts or other services from us
- Contact us or ask for information about a product or service
- Take part in a competition or survey
- Where your information is publically available

1.1. Information from other sources

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

1.2. 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 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
Financial details	<ul style="list-style-type: none">• uWatch uses accredited organisations for online purchases. Please see Appendix A.• uWatch only stores date, time and value of financial transactions for accounting purposes.• Compliance with a mandatory legal obligation, including for example accounting and tax requirements.
Bee.Watch: Smartphone App & Webpage Account, 'Report a Swarm' API	

¹ 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.

Information Stored	Reason for Storage
<p>All Bee.Watch users*</p> <ul style="list-style-type: none"> • Contact details • Name, address, email, telephone • Swarm or Tracking Location (GPS/postcode) • Alert (swarm or tracking) photograph • Bee.Watch user ID 	<ul style="list-style-type: none"> • In order to send you products and to provide support for our products. • To enable Bee.Watch app 'Swarm Coordinator' and 'Swarm Collector' Users to contact you if required, to aid managing and collecting swarms, that you report. • To allow a notifiable organisation to contact you in the event you sent an email to them (e.g. invasive species alert) • Your name, telephone, Bee.Watch user ID, swarm or tracking location and photograph is ONLY visible to 'Swarm Coordinator' and 'Swarm Collector' users in your swarm alert and/or notifiable organisations that you contact through Bee.Watch.
<p>Bee.Watch '(Professional) Beekeeper' and 'Swarm Collector' users</p> <ul style="list-style-type: none"> • Your postcode • Your apiary location(s) • iWas alert • Bee.Watch app user ID 	<ul style="list-style-type: none"> • To enable Bee.Watch app 'Pesticide Users' and 'Spray Liaison' users within a 10km radius of your hives, to anonymously notify you of planned pesticide treatments. • To enable 'Swarm Coordinator' and 'Swarm Collector' users to receive iWas alerts from '(Professional) Beekeeper' users. • Your apiary location(s) will be mapped within the Bee.Watch app 'Pesticide' user account, and if you choose to become affiliated, the Bee.Watch app Spray Liaison', 'Swarm Coordinator' and 'Swarm Collector' user accounts*.
<p>Bee.Watch 'Swarm Coordinator' and 'Spray Liaison' users</p> <ul style="list-style-type: none"> • Your name and telephone • Bee.Watch app user ID 	<ul style="list-style-type: none"> • To enable Bee.Watch app '(Professional) Beekeeper' and 'Swarm Collector' users to become affiliated with you and be contactable for swarm management. • To enable Bee.Watch app 'Pesticide' and '(Professional) Beekeeper' users to become affiliated to you for Spray Liaison.
<p>Bee.Watch 'Pesticide' users</p> <ul style="list-style-type: none"> • Your name and telephone • Your pesticide treatment, date, time & location of use • Bee.Watch app user ID 	<ul style="list-style-type: none"> • To anonymously notify Bee.Watch app '(Professional) Beekeeper' and 'Bystander' users within 10km and 1km respectively, of planned pesticide treatments. • To enable Bee.Watch app 'Spray Liaison' users to map pesticide alerts that you report. • Your name and telephone is ONLY visible to 'Spray Liaison' users in your swarm alert*.
<p>uWatch: uWatch Cube (Smartphone app & Webpage Account), uWatch Inventory (Asset List & Dodgy Gear Apps)</p>	
<p>All uWatch users</p> <ul style="list-style-type: none"> • Contact details • Name, address, email, telephone • Location (GPS/postcode) • Cube Alerts (including photographs) • uWatch user ID 	<ul style="list-style-type: none"> • In order to send you products and to provide support for our products. • To track lost items (via Cube alert location) • To allow a notifiable organisation to contact you in the event you send an email to them (e.g. escalate Cube alert to Police or Insurance Company). • Your name, telephone, uWatch user ID, location and Cube alert details are ONLY visible to you and/or notifiable organisations that you chose to contact through uWatch.
<p>uWatch Inventory users</p> <ul style="list-style-type: none"> • Personal item details (asset and alert images) stored in the uWatch Inventory • uWatch user ID 	<ul style="list-style-type: none"> • To enable uWatch Inventory users to store essential information and unique identification features of their assets. • Access to the uWatch Inventory and individual asset details and images is ONLY available to the individual uWatch account holder, unless they chose to forward or publish them.

* Bee.Watch app ('Professional) Beekeeper', 'Swarm Collector' and 'Pesticide' users can choose to become affiliated to, AND at any time remove their affiliation to a 'Swarm Coordinator' and/or 'Spray Liaison'. Users have the choice to remove their contact details and apiary location(s) from the 'Swarm Coordinator' beekeeper directory (accessed in the Bee.Watch Swarm Coordinator's webpage account) and 'Spray Liaison' map.

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 ensures that only staff that have a business reason to look at your information or data can do so. Staff cannot look at your information or data for personal reasons, or out of curiosity. uWatch 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.

Within the uWatch and Bee.Watch apps, users are able to notify of and share relevant information (for example swarm and pesticide notifications, or stolen assets) with other users or notifiable organisations of their own free will. uWatch will never sell a user's 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 and used to process your product purchase requests and support you in their use; the information will be retained for a reasonable period (refer to Section 4). 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 at ng@uwatch.co.uk.

uWatch has no way of knowing if any person providing information through our website is who they say they are. We 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 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 at ng@uwatch.co.uk.

We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

Details of our system security and data storage locations are provided in Appendix A.

2. Interactive areas

The www.uwatch.co.uk and www.bee.watch websites may include bulletin boards, discussion groups and other public areas that allow feedback and interaction between users. uWatch 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 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 for any loss that we may suffer because of your action.

- By submitting messages to our sites you are giving uWatch 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.

3. 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.

No cookie placed by uWatch 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.

4. 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.

5. 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; and
- 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.

6. 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.

7. 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.

8. Accuracy of information

We need to keep accurate personal data about you and 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.

9. 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

10. Disclaimer

uWatch is not responsible for any of the following circumstances as a result of using our systems:

- damage, loss or theft of property
- loss of income or change in insurance claims and status
- damage, loss or theft to the environment, habitat, flora and fauna, and
- adverse health conditions, illness or death to a person or people.

Appendix A System Security

General

Users: Each user is provided with secure access to the uWatch Management and Communication System (MCS) through their user Webpage account.

Passwords: user 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, time and value of financial transactions.

uWatch Cube SIM and APN

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

uWatch Cube 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. Further information is available on their website.