

The AVA logo is displayed in white, stylized, sans-serif capital letters within a blue rounded square in the top-left corner of the page. The background of the page is a photograph of a person's hands clasped together on a wooden table, with a document and another person's hands visible in the blurred background.

AVA

Business Services Policy Notice

This privacy notice tells you about the information we process about you whilst you utilise business services provided by Ava, and in some aspects after you cease using those services. In delivery of our business services information at time we serve data processors and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

Who are we?

We are AVA Security Limited (Ava), a company registered in England and Wales (Company No. 10187484 whose registered office is at Upper Ground Floor, The Charter Building, Charter Place, Uxbridge, Middlesex, England, UB8 1JG.

Our main office of operation is at the same address. You can contact us by post FAO Data Protection Officer at the above address or by email at dpo@ava.uk.

What do we do?

Ava provides business Cyber and Video security services in the form of the Ava Aware and Ava Reveal Cloud services.

What data do we process?

Our customers utilise the online Cloud services we provide. The utilisation of such systems results in information of the usage being captured in the system history and related logs.

This information is held for our legitimate interests around business contract delivery, quality of service delivery and legitimate interests around subjects such as cyber-security and crime prevention.

For the **Ava Reveal** product: we process Customer Data. "Customer Data" includes, but is not limited to (I) information which identifies or could reasonably be used to identify any natural person, including without limitation a person's first and last name, home or other physical address, telephone number, fax number, email address, social security number, driver's license, government issued identification card, UDID, IP address, etc., (II) data collected directly from a user via an application's user interface (name, address, date of birth), (III) data that is gathered indirectly, such as mobile phone numbers, IMEI, or UDID, and (IV) data gathered about a user's behavior, such as purchase and transactional information, location data, web browsing data or the applications used which is linked to a unique profile.

For the **Ava Aware** we process Customer Data. "Customer Data" includes, but is not limited to, (I) CCTV video and audio data collected from Ava Aware cameras and (II) analytics derived from this.

We do not use the information gathered to make any automated decisions that might affect you.

What do we do?

Information relating to security logs involves storage on Ava servers within secured third party data centers. EU customer data is stored within the EEA and US customer data is stored on a data centre in the US.

How long is the data stored?

All information is held in line with Ava's Retention Policy. For the Ava Reveal Cyber service this is normally 3 months and for the Ava Aware Video Service this is for the duration that is configured by the customer.

What we will do

We will only process the personal data on instructions from a controller

If we become aware of a personal data breach, we will notify the relevant controller without undue delay

We will ensure that any transfer outside the EEA is authorised by the controller and complies with the GDPR's transfer provisions.

We will not engage another processor (ie a sub-processor) without the controller's prior specific or general written authorisation.

As a data processor we will sometimes need to assist the data controller in facilitating requests made by individuals, i.e. if requested delete any data we are processing on behalf of a controller.

Further information on what we process is contained in Exhibit A, the Data Processing Addendum, of Ava's Master Services Agreement on the Ava Security website here <https://www.ava.uk/msa>

Your right to complain

If you have a complaint about our use of your information, we would prefer you to raise it with us in the first instance by emailing dpo@ava.uk to give us the opportunity to put it right, in the UK you as escalation you can contact the Information Commissioner's Office via their website at www.ico.org.uk/concerns or write to them at:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF