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# Platform Privacy Policy

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This policy (and any other documents referred to in it) describes how we collect and use your personal data during your use of the mXacctv Platform (platform.mxacctv.co.uk or any associated / derivative URL) (the 'platform') and related services in accordance with the General Data Protection Regulation (GDPR) and related UK data protection legislation.

## A) Who is using your personal data?

mXreality is the "data controller" for the information that we collect when you visit the platform. This means that we decide how to use it and are responsible for looking after it in accordance with the GDPR.

Access to your personal data within the Company will be provided to those staff members who need to view it as part of their work in connection with the operation of the platform. It may also be shared with the third parties.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We may update this policy at any time.

## B) Glossary

Where we refer in this policy to your 'personal data', we mean any recorded information that is about you and from which you can be identified. It does not include data where your identity has been removed (anonymous data).

Where we refer to the 'processing' of your personal data, we mean anything that we do with that information, including collection, use, storage, disclosure, deletion, or retention.

## C) Types of data we collect about you

We may automatically collect, store, and use some or all of the following categories of data when you use our platform / services:

Technical information, for example, the type of device (and its unique device identifier) you use to access our platform, the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, mobile network information and platform;

Information about your visit to our platform (including date and time), pages you viewed, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;

Information generated or transmitted related to your use of our platform e.g. video captures, video streams, images and screenshots, audio recordings.

## D) How we use your data

We process your data for purposes arising from your use of the platform/services, for example, to ensure that we understand who uses our platform and how it is used and to improve it and ensure it is secure. This processing occurs because it is necessary

to meet our legitimate interests in operating and providing the service to you, improving the platform, analysing its use, and ensuring its security.

We will only use your data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

#### **E) Sharing your data with third parties**

We may share your data with third parties who provide services on our behalf, such as those who help us to operate the platform. All our third-party service providers are required to take appropriate security measures to protect your data in line with our policies. We permit them to process your data only for specified purposes only.

We may also share your personal data with third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our platform/service terms of use or to protect the rights, property or safety of our platform, our users, and others.

Where your data is shared with third parties, we will seek to share the minimum amount necessary.

#### **F) Where we store or use your data**

We may store data collected by the platform manually or electronically. The data is stored on our secure servers and/or in our premises within the UK.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data transmitted to the platform/service and any transmission is at your own risk.

#### **G) Third party websites**

Our platform/service may contain links to and from various third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### **H) Retaining your data**

We will only retain your data for as long as we need it to fulfil our purposes, including any relating to legal, accounting, or reporting requirements.

#### **I) Your rights**

Under certain circumstances, by law you have the right to:

- Request access to your data (commonly known as a "subject access request"). This enables you to receive a copy of your data and to check that we are lawfully processing it.

- Request correction of your data. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- Request erasure of your data. This enables you to ask us to delete or remove your data under certain circumstances, for example, if you consider that there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- Object to processing of your data where we are relying on our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your data. This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your data to another party.

Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop. Further information on your rights is available from the Information Commissioner's Office (ICO).

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, you should contact us at our [mxacctv@mxreality.co.uk](mailto:mxacctv@mxreality.co.uk) email address and will be passed onto our Data Protection Officer. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you remain dissatisfied, you have the right to lodge a complaint with the ICO at <https://ico.org.uk/concerns/>.

## J) Cookies

Our platform may use cookies to distinguish you from other users of our platform. This helps us to provide you with a good experience when you use the platform and also allows us to improve our platform.

## K) Changes to this policy

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

## L) Contact

If you wish to raise any queries or concerns about this privacy policy please contact Information Compliance by email at [mxacctv@mxreality.co.uk](mailto:mxacctv@mxreality.co.uk) or by post at MX Reality, 1 Portland Drive, Willen, Milton Keynes, MK15 9JW.