

## Calipsa

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### General Privacy Policy

Last Modified: 23 March 2021

This Policy is issued on behalf of Calipsa Limited, a private limited company established under the laws of England and Wales having an address at 5 Merchant Square, London, England, W2 1AY and its fully owned subsidiary, Calipsa LLC, a Delaware limited liability company having an address at Regus Lakeview University, 20130 Lakeview Centre Plaza, Suite 400, Ashburn, Virginia 20147 ("**Calipsa**", "**our**", "**us**" or "**we**").

#### **Contact Information**

If you have any questions, concerns or complaints regarding this Privacy Policy, or regarding a contact person (representative) for compliance with the relevant law or regulation, you can reach us at:

Website: [www.calipsa.io](http://www.calipsa.io)

E-mail: [privacy@calipsa.io](mailto:privacy@calipsa.io)

Postal Address: Calipsa Ltd, Attn: Mohammad Rashid Khan, 5 Merchant Square, London, W2 1AY, United Kingdom

Telephone: (+44) 20 81329232

#### **Scope**

This Privacy Policy describes and applies to the types of information we may collect from you or that you may provide when you visit the website <https://www.calipsa.io/> (our "**Website**"), or contact us directly offline, or we may collect about you through our Customers' (as defined below) use of our Services, and our practices for collecting, processing, using, maintaining, protecting, and disclosing such information. "**Services**," as used herein, are defined as the administrative, technical, and physical functionality related to our: (i) **remote video monitoring platform** (service sold through monthly or yearly contract), and (ii) **Calipsa engine** (services sold through monthly or yearly contract).

This Policy does not apply to information we collect/process on behalf of our Customers as a service provider or a data processor. Such processing is governed by our Customer contracts and if you have query as to how our Customers use your information you should address it directly to them. This Policy does, however, apply to certain information processing for the purpose of improving our Services.

California residents may have additional rights and choices. To learn more about your California privacy rights, please see our [Privacy Notice for California Residents](#).

#### **Information We Collect**

We collect/process several types of information from and about users of our Website and/or Services, including: (i) "**Personal Information**," which the California Consumer Privacy Act of 2018 (CCPA) defines as information that directly or indirectly identifies, relates to, describes, is reasonably capable of being associated with, or can reasonably linked to a particular consumer or household, (ii) "**Personal Data**," which the EU General Data Protection Regulation 2016/1679 (GDPR) defines as any information relating to an

identified or identifiable data subject; (iii) information or data that is about you, but in a form that does not, own its own, permit direct association with you (e.g., sex, age, language preference, occupation, or the like); (iv) information or data about your interaction with (or use of) our Website or Services, which may include your Internet connection, the equipment you use to access our Website or Services, and details relating to your use of our Website or Services; and (v) information or data about your interaction with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Privacy Policy.

### **Information We Collect Directly From You**

We collect/process information received directly from you when you provide it to us, which may include information you provide to us: (i) through e-mail, messages, chat rooms, blogs, or our Website or Services; (ii) offline when you contact us in writing or by telephone, including when you contact customer support and when you request a demonstration of our Services; (iii) at the time of registering and/or subscribing to use our Website or Services; (iv) when you voluntarily enter a contest or promotion or take a survey sponsored by us; or (v) when you report a problem with our Website or Services, including when you contact our technical support.

Different forms on our Website (e.g. registration form) may also collect your name, e-mail, phone number, company name (if applicable), country, area, zip code, address, password or other data to help you with your experience. Provision of such contact information is voluntary, unless in the relevant forms specify that this data is necessary for use of our Website and/or the Services.

When using our Services you may be required to provide billing information. This information is required by us to verify your identity, and invoice you (if applicable).

For the purposes of European data protection laws, we process all information collected directly from you on the basis of our legitimate interests, that are to deliver, manage, improve and promote our Services to the organisation you represent, ie our Customers and prospective Customers.

### **Information We Collect Through Automatic Data Collection Technologies**

In addition to any information that we collect/process directly from you, we may use a variety of technologies that automatically (or passively) collect/process certain information or data whenever you visit or interact with our Website or while using our Services, or whenever you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy. Please see the "Cookies" section below for further information about this collection/processing.

Please use the 'Decline' button on the cookies banner on our Website if you do not wish us to collect/process this type of information.

For the purposes of European data protection laws, we process information collected through automatic data collection technologies on the basis of our legitimate interests that are displaying our Website where such technologies are necessary for the delivering online content. Where such technologies are not strictly necessary for the delivering of online content we rely on your consent to the processing.

### **Information We Collect Through Our Customers and Affiliates**

In addition to any information that we collect/process directly from you and through the use of a variety of automatic (or passive) data collection technologies, we collect/process:

(i) data received from our Customers through the use of our Services, which includes closed circuit television (CCTV) footage from various sites being monitored by our Customers and analytics data related to the same (“**Customer Data**”); and

(ii) Customer Data received from our Affiliates.

“**Customers**,” as used herein, is defined as any entity that uses our Services. “**Affiliate(s)**,” as used herein, means any company or other entity, whether or not with legal personality, which directly or indirectly controls, is controlled by or is under joint control with that company or other entity. For this purpose, a company or other entity is deemed to control a company or entity if it (a) owns, directly or indirectly, at least fifty (50) percent of the capital of the other company, or (b) in the absence of such ownership interest, substantially has the power to direct or cause the direction of the management and set the policies of such company or entity.

How we use information or data obtained from our Customers and Affiliates:

For the purposes of European data protection laws, we process Customer Data and analytics related to the same on the basis of our legitimate interests, that are to provide and improve our Services and compile data about the functionality of our Services so that we can offer our Customers better experience and tools in the future.

For the purposes of European data protection laws, our Affiliates exchange Customer Data on the basis of our legitimate interests that are to provide and improve our Services.

### **Information We Collect Through Our Third Party Sales Representatives**

We use sales representatives in certain geographies such as Latin America and the Caribbean, Australia and New Zealand. These third parties help us promote our Services by lead generation. These third parties may pass on your basic contact details, such as phone number, email address and the name of the organization you represent in order for us to make contact with you and promote our Services.

For the purposes of European data protection laws, in these circumstances we would process your personal data on the basis of our legitimate interests that are to promote our Services.

### **Disclosure of Information We Collect**

We may use a third party (e.g., processor, sub-processor, service provider, contractor, partner, supplier, etc.) or Affiliate to perform certain business-related functions. Examples of such functions include, but are not limited to: data storage services, data labelling, analytics, debugging, technical resolution, product improvement, database maintenance services, mailing, and payment processing. When we use a third party or Affiliate to perform services on our behalf, we will only provide them with access to Personal Information or Personal Data that they need to perform their specific function. We will make sure that each third party or Affiliate will be required by contract to keep such Personal Information or Personal Data confidential, make necessary steps to protect such Personal Information or Personal Data, and not to use it for any purpose other than providing services to us and other provisions as required by law or regulation.

For an up-to-date list of our current providers/processors/sub-processors, please see the [Security, Privacy and Architecture of the Calipsa Software](#).

For an up-to-date list of the partners who provide automatic data collection technologies on our Website, please see the "Cookies" section below.

Before transferring any Personal Data or Personal Information to third party (processor, sub-processor, service provider, contractor, affiliate, partner, contractor, supplier, etc.) we shall make reasonable check of such third party regarding its compliance with the applicable law.

**Compliance with Laws and Law Enforcement Requests.** We may disclose Personal Information or Personal Data if required to do so by law or to comply with a legal obligation, or if we believe in good faith that such action is necessary to: (i) protect our rights or property and our Customers or (ii) protect the property or safety of users of our Website or Services and the accompanying services, legal owners of our Website or Services (iii) or any third party. If we will be required by law to disclose any of your Personal Information or Personal Data, we will use reasonable efforts to provide you with notice of that disclosure requirement, unless we are prohibited from doing so by statute, court or administrative order.

**Business Transfers.** We reserve the right to sell, assign, or transfer our business or assets. In any such event or similar event, including but not limiting to a corporate sale, merger, reorganization, dissolution, etc., Personal Information or Personal Data may be part of the transferred assets. You acknowledge that such transfers may occur and that any acquirer or successor of ours may continue to use your Personal Information or Personal Data as set forth in this Privacy Policy.

**Other Third Parties.** We may also make certain information in a form that does not, on its own, permit direct association with you available to third parties for various purposes, including for business or marketing purposes or to assist third parties in understanding our users' interest, habits, and usage patterns for certain programs, content, services, advertisements, promotions, the functionality available through the Service, statistics and other use. This information is not associated with any Personal Information or Personal Data that can identify any individual person.

California residents may have additional rights and choices regarding the disclosure of information we collect. To learn more about your California privacy rights, please see our [Privacy Notice for California Residents](#).

**Third-Party Collection of Information.** For the convenience of our users and visitors, our Website and/or e-mails may contain links to other sites that are subject to different privacy policies. This Privacy Policy will not apply to other sites, applications and/or services that are managed by us or otherwise are under our control, unless expressly pointed.

Information collected by third parties that may include such things as location data or contact details is governed by their privacy practices. We encourage our users to be aware when they leave our Website and to read privacy statements of any other site or apps that collect personally identifiable information (i.e., Personal Information or Personal Data).

**Integrated Third Parties, Social Media & Widgets.** Our Website may include social media features, widgets and live chat functionalities ("**Feature**" or "**Features**"). These Features may collect your IP address, which page you are visiting on our Website, and may set Cookies to enable a Feature to function properly.

Features are either hosted by a third party or hosted directly on our Website. Your interactions with these Features are partially governed by the privacy policy of the company providing it.

When you use our Website or post on our Website, chat function, blog, or social networking service (if any), the Personal Information or Personal Data and other content you share is visible to other users and can be read, collected, or used by them. You are responsible for the Personal Information or Personal Data you choose to share or submit in these instances. For example, if you post your name and e-mail address in a forum posting, that information is public. Please take care when using these Features. By submitting actions specified above, unless otherwise prohibited by law or regulation, you grant us, our partners and affiliates a non-exclusive, unlimited, worldwide, royalty-free license to use, display, perform, copy, transmit, distribute, promote, alter, modify, manipulate or create derivative works with materials, texts, words, impressions and other information provided by you in such a way.

Calipsa uses application program interfaces (APIs) from the following third parties:

- Twilio Inc. for SMS delivery;
- Amazon Inc. for email delivery and server hosting;
- Google Inc. for analytics;
- Gravity Boulevard LLC for their product Holiday API for public holiday planning; and
- Various video management software integrations, depending on Customer set up, such as IMMIX, Sentinel, Milestone, Digital Watchdog, Exacq, Genetec and others.

## **Your Rights**

Under European data protection law, you have various rights in relation to your personal data. All of these rights can be exercised by contacting us at [privacy@calipsa.io](mailto:privacy@calipsa.io).

In certain circumstances, you have the right to:

- be informed (of the processing);
- access (such information);
- rectification (of inaccurate information);
- erasure (of such information);
- restrict processing (in certain cases);
- object to profiling;
- data portability (in certain cases);
- complain to the Information Commissioner's Office;
- withdraw consent (if we have collected your personal information on this basis).

Detailed information on the full content of your rights (and any conditions that may apply) is provided by the United Kingdom's Information Commissioner's Office and is available on their website: <https://ico.org.uk/your-data-matters/>.

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Asking us to stop processing your personal data or deleting your personal data will likely mean that you the organisation you represent will no longer be able to use our Services, or at least those aspects of the Services which require the processing of the types of personal data you have asked us to delete.

Where you request Calipsa to rectify or erase your personal data or restrict any processing of such personal data, Calipsa may notify third parties to whom such personal data has been disclosed of such request. However, such third party may have the right to retain and continue to process such personal data in its own right.

While we will not sell your Personal Information or Personal Data (or any other data you provide us with) to third-parties, we reserve the right to share any data which has been anonymised. You acknowledge and accept that we own all right, title and interest in and to any derived data or aggregated and/or anonymised data collected or created by us.

### **Data Security**

Calipsa is committed to achieving and maintaining the trust of users of our Website and our Customers. Integral to this mission is providing a robust security and privacy program that carefully considers data protection matters related to the user of our Website and Services, and Customer Data. For details on our information security program, please see the [Security, Privacy and Architecture of the Calipsa Software](#) documentation available on our Website.

No data transmission over the internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

Sensitive information between your browser and our Website is transferred in encrypted form using secure socket layer (“SSL”) or equivalent cryptographic protocols using certificates issued by a trusted third party authority.

### **How Long We Retain Your Personal Data**

We will hold the above information for as long as is necessary in order to conduct the processing detailed in the table above, deal with any specific issues that may raise, or otherwise as is required by law or any relevant regulatory body. Some personal data may need to be retained for longer than the organisation you represent is our Customer. This to ensure Calipsa can comply with applicable laws and internal compliance procedures, including retaining your email address for marketing communication suppression if you have opted not to receive any further marketing.

If information is used for two purposes, we will retain it until the purpose with the latest period expires but we will stop using it for the purpose with a shorter period when that period expires.

We restrict access to your personal information to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs and your information that is no longer needed is either irreversibly anonymized (and the anonymized information may be retained) or securely destroyed. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the personal risk or harm from unauthorized use or disclosure, the purpose for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### **Exports Outside the EEA and the UK**

Your personal information may be accessed by staff or suppliers in, transferred to, and/or stored at, a destination outside the European Economic Area (EEA) or the United Kingdom (UK) in which data protection laws may be of a lower standard than in the EEA or the UK. Regardless of location or whether

the person is an employee or contractor, we will impose the same data protection safeguards that we deploy inside the UK.

Certain countries outside the EEA and the UK have been approved by the European Commission and the Information Commissioner's Office as providing essentially equivalent protections to EEA and UK data protection laws and therefore no additional safeguards are required to export personal information to these jurisdictions. In countries which have not had these approvals, we will transfer it subject to European Commission and Information Commissioner's Office approved contractual terms that impose equivalent data protection obligations directly on the recipient, unless we are permitted under applicable data protection law to make such transfers without such formalities.

Please contact us if you would like further details of the specific safeguards applied to the export of your personal data.

### **"Cookies" and Similar Technologies on Calipsa.io**

Calipsa.io uses "cookies." Some of these are essential or functional, while others help us to improve your experience by providing insights into how the site is being used. We also use "cookies" for advertising. Some "cookies" and similar technologies, particularly those that track browsing behavior across the web are perceived by data protection regulators as privacy-intrusive. We are, therefore, presenting the below information to our Website visitors in order to explain why and how we use this technology. "Cookies" work with the help of certain online identifiers and typically involve the processing of the following information that is considered personal data:

- Internet Protocol (IP) addresses;
- Device or mobile IDs and/or device model and type;
- Browser information, operating system information, and/or language preferences;
- The location and the preceding and succeeding websites you have visited, including which pages/part/icons on our Website you interacted with;
- Applications you click on and how often; and
- The pages of our Website you visit, and how long you spend on each page.

### **Lawful Grounds for Processing**

For the purposes of data protection law, we use the following justifications to process your online identifiers derived from "cookies":

- We use "cookies" for the correct, efficient and viable delivery of online content. The processing is necessary for our legitimate interest (that are to ensure the availability of our Website).
- We use "cookies" for the analysis and optimisation of our Website performance and engagement. The processing is necessary for the purpose of improving our services and is subject to your permission (consent).
- We use "cookies" for the delivery (including via third parties) of targeted advertising tailored to your interests. The processing is necessary for the purpose of promoting our services and is subject to your permission (consent).

## Details of the Processing

The following "cookies" are automatically downloaded on any device used to access our Website.

"Cookie"	Party serving it	Purpose	Privacy policy
yt	Youtube	To connect Calipsa's YouTube account to calipsa.io for a streamlined user experience	<a href="https://policies.google.com/privacy?hl=en-GB">https://policies.google.com/privacy?hl=en-GB</a>
ht	Hubspot	To provide a more personalised experience through the Calipsa website CMS, CRM and marketing automation platform	<a href="https://legal.hubspot.com/product-privacy-policy">https://legal.hubspot.com/product-privacy-policy</a>
lang	Linkedin	To connect Calipsa's LinkedIn advertising account to calipsa.io for content retargeting	<a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>
Fb	Facebook	To connect Calipsa's Facebook advertising account to calipsa.io for content retargeting	<a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a>
Hotjar	Hotjar	To anonymously understand the traffic on calipsa.io	<a href="https://help.hotjar.com/hc/en-us/categories/115001323967-About-Hotjar">https://help.hotjar.com/hc/en-us/categories/115001323967-About-Hotjar</a>
Ga	Google	To anonymously understand the traffic on calipsa.io via Google Analytics	<a href="https://policies.google.com/technologies/partner-sites">https://policies.google.com/technologies/partner-sites</a>
Lf	Lfeeder	To anonymously understand the businesses that visit calipsa.io	<a href="https://www.leadfeeder.com/privacy/">https://www.leadfeeder.com/privacy/</a>
GT	Google	To manage links and tracking on calipsa.io via Google Tag Manager	<a href="https://marketingplatform.google.com/about/analytics/tag-manager/use-policy/">https://marketingplatform.google.com/about/analytics/tag-manager/use-policy/</a>

## Exercising Control

Please exercise your choice with respect to accepting or rejecting "cookies" via the pop-up on our Website.



In addition to the controls provided on our Website via the pop-up, you can choose to block "cookies" by activating the settings on your browser that allow you to refuse the setting of all or some cookies. However, if you use your browser settings to block all "cookies" (including essential "cookies") you may not be able to access parts of our Website. Your browser settings also allow you to delete all "cookies" stored on your device whenever you wish.

### **Additional Information**

The UK Information Commissioner's Office provides the following guidance on controlling "cookies":

- A number of websites provide detailed information on "cookies", including [AboutCookies.org](#) and [AllAboutCookies.org](#).
- The European Interactive Digital Advertising Alliance website [Your Online Choices](#) allows you to install opt-out "cookies" across different advertising networks.
- Google has developed a browser add-on to allow users to [opt-out of Google Analytics](#) across all websites which use it.
- Some browsers include a feature known as "Do Not Track" or DNT. This allows you to indicate a preference that websites should not track you. However, whilst DNT is available in many browsers, websites are not required to recognise its request, so it may not always work. You can get help on how to use DNT in [Microsoft Edge](#), [Mozilla Firefox](#), [Google Chrome](#) and [Opera](#).
- For more information on how private browsing works as well as its limitations, visit the support pages for your browser: [Microsoft Edge](#), [Microsoft Internet Explorer](#), [Mozilla Firefox](#), [Google Chrome](#) and Safari ([IOS \(mobile\)](#) and [desktop](#)).

### **Additional Steps You Can Take to Protect Your Privacy Online**

If you are concerned about online tracking then we can recommend you to:

- Set your browser settings to delete all "cookies" every time you close your browser.
- Consider adopting [Global Privacy Control](#);
- Install a privacy-friendly browser on your device, such as [Mozilla Firefox](#), [Safari](#), or [Brave](#);
- Install anti-tracking and ad-blocking plug-ins on that browser, such as [Ad Block Plus](#), [Ghostery](#) or [PrivacyBadger](#); and
- Use privacy-friendly web search engines, such as [Ecosia](#) or [DuckDuckGo](#).

If you have any questions about the "cookies" or similar technologies in use on our Website, please contact us at [privacy@calipsa.io](mailto:privacy@calipsa.io)

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material changes to how we treat our users' Personal Information or Personal Data, we will notify you through a notice on our Website home page. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for periodically visiting our Website and this Privacy Policy to check for any changes.