

SCHEDULE 4– Privacy Notice

This privacy notice describes how Onwave collect and use personal information about you which is collected via the OWL Portal and related OWL tracker (being either the OWL App or other tracker device).

Where we collect information about you via the OWL Portal or the OWL tracker (including the OWL App), we do so as a processor on behalf of the Onwave Customer who arranged your access to OWL. That Onwave Customer will be the controller of the data and we will only process your personal data in accordance with their instructions.

If you have any questions about how your personal information is collected and used or if you would like to exercise your rights as a data subject (for example your right to access information or to erase information), please contact the customer who arranged your access to OWL or see their privacy notice.

For general information about how Onwave uses your personal data outside of the OWL Portal and Tracker, please see our general privacy notice which can be provided to you on request.

1 INFORMATION ABOUT US AND OWL

1.1 We are Onwave UK Ltd. Our registered office is at 4 Abbey Wood Road, Kings Hill, West Malling, England, ME19 4AB and our registered company number is 07490613. Our contact details are set out at <https://onwave.com/contact-us/>

1.2 The OWL geofencing portal and the related mobile app / tracker device (together the **OWL Service**) is a zonal working solution designed to provide health, safety, environmental and productivity benefits. It works as follows:

1.2.1 Onwave customers (referred to as a **Customer** or **Customers** in this document) create an account with us and establish geographic zones within a project (**Project**) which have different rules and alerts applied to them.

1.2.2 Visitors to a Project then either download the OWL App onto their mobile device, or carry a mobile device or a specialised tracking unit supplied by Onwave to the Customer.

1.2.3 If you use a mobile device, your Project Administrator will create your account, providing an email address which will act as your username. A password will be automatically generated. We recommend that you change this password on your first login to the system.

1.2.4 The mobile device or tracker uses its geolocation signal to receive information and alerts from the OWL Portal based on its reported location, for example if a Customer has configured a zone to provide an alert when you enter, your device would provide an alert to you when its geolocation signal told the OWL Portal you were in that zone.

1.2.5 The Customer will receive information about the different devices which are registered with a Project when logged-in to the Owl Portal or Owl App, including their geolocation data. Customers will receive this for as long as the tracking unit is turned on, and for as long as the tracking function on the OWL app on a mobile device is turned on. If you do not log out of the Owl App after you leave a Project, your geolocation data will continue being sent to the Customer even when you are not on Project.

- 1.2.6 Customers receive and use the data in their own right as data controllers and we will process the information as data processors on their behalf. This means they decide what to do with the information and how long to keep it. If you have any queries about how your data is being used, you should contact the Customer directly.

2 INFORMATION WE COLLECT OR GENERATE ON BEHALF OF A CUSTOMER

- 2.1 **When you set up to use the OWL App or tracker** (or a Customer or someone else does so on your behalf) there will be personal information about you relating to that account such as your email address, contact details, and potentially correspondence with us about your account. A Customer may provide us with your information in order for us to send an account setup email to you.
- 2.2 **Required information.** You will need to provide certain information to us to enable us to setup a relevant OWL account on the OWL Portal or OWL App. Mandatory information fields are generally set out when you are setting up an account, but in particular, you must provide a valid email address. Your password will be emailed to you upon account enrolment.
- 2.3 **Tracking information.** Whether you are using a mobile device or tracker, the OWL portal will collect detailed information about your location (based on the geolocation signal of your device), the time-stamp of that location information, and alerts or other information which has been provided to you. This information is saved to a location history of all of the tracking data which has been collected about you and how you interacted with it. This information is linked with your account and is shared with the applicable Customer. We may also create or use unique identifiers associated with a tracker or app or mobile device in order to associate tracking data with an individual or profile.
- 2.4 **Geolocation signal** is determined by collecting data about your device's geolocation signal as well as potentially its proximity to certain other signals (for instance, Bluetooth beacons, WiFi signals, and mobile phone masts). This process is carried out internally by your device, and we simply receive the data from your device.
- 2.5 **How long you are tracked for.** Your geolocation information is recorded and shared with the Customer when you are logged-in to the OWL App or when you are using a powered up tracking device (provided in each case that they are associated with a Project).
- 2.6 **Device information.** We may collect and record how often you use the app or a tracking device and for how long, your device type, unique identifiers, operating system type & version, battery usage, information that you viewed on the app, the Internet Protocol (IP) address and the name of the domain that serves you to access the app. We also collect information about the interaction of your devices with the app, including, crash reports, system activity, and the date, time, and referrer URL of your request.
- 2.7 **Other correspondence or interaction** (for example by email, telephone, post, SMS or via our website) between you and us, will include personal information (such as names and contact details) in that correspondence. This may include enquiries, reviews, follow-up comments or complaints lodged by or against you and disputes with you or your organisation. If you work for one of our Customers, suppliers, business partners or are a third party contractor, the information we collect about you may include your contact information, details of your employment and our relationship with you. This information may be collected directly from you, or provided by your organisation. Your organisation should have informed you that your information would be provided to us, and directed you to this policy. We use this as necessary for our legitimate interests in managing our relationship with your organisation. If

we have a business relationship with you or your organisation, we may receive information about you from your organisation.

3 IF YOU DO NOT WISH TO BE TRACKED

- 3.1 **You must either return the tracker, or log-out from the OWL App**, in order to not be tracked.
- 3.2 Turning off geolocation functionality on your mobile device does not stop geolocation data being reported and shared (although it may be less accurate).
- 3.3 Closing the app in your “recent apps” settings or otherwise trying to close the OWL App will not successfully stop geolocation data being reported and shared.
- 3.4 Leaving a Project does not stop geolocation data from being reported and shared.

4 HOW WE USE THAT INFORMATION

- 4.1 We will:
 - 4.1.1 Collect and store that information and share it with the relevant Customer (please note Customers can see a live feed and review historic data).
 - 4.1.2 Use it to generate individual and aggregated statistics, profiles and other analyses regarding user activity, and share these with Customers. While we produce these by automated means, we do not use them to make any significant decisions regarding you. Customers may use this information in order to make decisions about you however, and if you have any queries or issues regarding those decisions or the logic on which they are based, you should contact the relevant Customer directly.
 - 4.1.3 Use it to display alerts or other information to you based on your geolocation or your history.
 - 4.1.4 Use it to review and improve our offerings, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
 - 4.1.5 Communicate with you regarding your app or tracker and to provide other operational information about our service.
 - 4.2 We will use the information which we collect in order to carry out our contracts with Customers and as otherwise directed by our Customers.
 - 4.3 **Customer uses of data.** Please note we are not in control of how our Customers use your information. If you have any queries or issues regarding a Customer’s use of your information, please contact them directly. We will not be able to delete or provide access to information held by or on behalf of a Customer.
- ### 5 HOW LONG WE KEEP YOUR INFORMATION
- 5.1 This section sets out the timescales that for which we generally keep information. However, the Customer may set their own retention policies which we have no control over. You should contact the Customer directly if you have any queries about how long they retain your data for.

- 5.2 **Information you have inputted into your account (or which is inputted into the OWL Portal by a Customer) such as your email address (but not information which the app collects)** is kept by us for a period of up to 90 days after either you close your account or the Customer whose Project you have checked into or otherwise associated your account with terminates their contract with us. We give Customers the ability to download data from the OWL Portal. Where Customers download data they will keep it in accordance with their data retention policies. Please contact the relevant Customer to find out more information about their data retention practices.
- 5.3 **Information which the app or a tracker collects, such as geolocation information**, is kept for a period of up to 90 days after the Customer whose Project you have checked into or otherwise associated your account with terminates their contract with us. The Customer may retain the data themselves for longer, and you should contact them directly if you have any queries about how long they retain your data for. Just because you close your account or delete the app, does not mean that your data will be deleted.
- 5.4 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

6 SHARING YOUR INFORMATION

- 6.1 **We share your information with Customers** as set out above. This section sets out the other ways in which we might share your information.
- 6.2 **We never sell your data to third parties.** But we may need to share your information with third parties, including third-party service providers, hosting providers (such as AWS) and other entities in our group. Third parties are required to respect the security of your personal information and to treat it in accordance with the law.
- 6.3 **Why might we share your personal information with third parties?** We may share your personal information with third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our agreements with you, or to protect the rights, property, or safety of us, our Customers, or others or where we have another legitimate interest in doing so.
- 6.4 **Which third-party service providers process your personal information?** We may need to share your personal information with third-party service providers (including contractors and designated agents) so that they can carry out their services. We may use third-party service providers in relation to the following types of activity: legal advice, contract administration, administration, hardware and software development and IT services.
- 6.5 **When might we share your personal information with other entities in the group?** We may share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, and for system maintenance support and hosting of data.
- 6.6 **What about other third parties?** We may share your personal information with other third parties, for example with potential buyers and professional advisers in the context of the possible sale or restructuring of the business where necessary in connection with the purposes which your information was collected for. We may also need to share your personal information with a regulator or to otherwise comply with the law.

7 WHERE WE STORE YOUR INFORMATION

- 7.1 Our office headquarters are based in the UK and our main data centre is located in the UK. We also use cloud services provided by Microsoft in the Western Europe region. However, where required to perform our contract with the Customer or for our wider business purposes, the information that we hold about you may be transferred to, and stored at, a destination outside the UK and the EU. It may also be processed by staff operating outside the UK and EU who work for us or for one of our service providers. OWL is available internationally and when used outside of the UK and the EU then information that we hold about you will be stored at an appropriate location, this may be local to you or may be within our main area of operation which is within the UK and the EU
- 7.2 For information about where the Customers store your information please contact them directly or see their Privacy Notice.

8 YOUR RIGHTS

Data protection law gives you a number of rights when it comes to personal information held about you. These key rights include the right to be informed about how your personal information is being used and the right to request access to your personal information. To exercise these rights please contact the relevant Customer.

9 CHANGES TO THIS PRIVACY NOTICE

Should we make any changes to this privacy notice in the future, we will upload the revised privacy notice and, where appropriate, notify you by e-mail or otherwise. Please check back frequently to see any updates or changes to our privacy notice have been made and are relevant to you.