

PULSE SMART HUB PRIVACY NOTICE

We respect the privacy of every person who uses the Pulse Smart Hubs (“**Pulses**”) and uses the services made available through the Pulses (the “**Services**”) and we are committed to ensuring a safe online experience. The Services are more fully described in the [Terms of Use](#).

1 PURPOSE OF THIS NOTICE

This privacy notice explains our approach to any personal information that you might supply to us (or that might be collected from you) in connection with your use of the Services and sets out your rights in respect of Urban Innovation’s processing of your personal information. For more information see below.

This privacy notice will inform you how you can verify which of your personal information is collected by us through the Services and how you can request that we delete, update or transfer it.

This privacy notice is intended to assist you in making informed decisions when using the Services. Please take a moment to read and understand it. Please note that it should be read in conjunction with our [Terms of Use](#).

Please also note that this privacy notice only applies to the use of personal information collected by us from your use of the Services or during your communications with us. It does not apply to personal information collected during your communications with third parties.

2 WHO ARE WE AND WHAT DO WE DO?

The Services are operated by Urban Innovation Company (UIC) Limited (“**Urban Innovation**”) a wholly owned subsidiary of Wildstone Capital Limited whose principal activities include designing, engineering and developing street furniture and telecommunications activities. For more information see below.

Urban Innovation is a company with registered company number: NI020783 and whose principal address is 42-46 Fountain Street, Belfast, Northern Ireland, BT1 5EF.

3 HOW TO CONTACT US?

If you have any questions about this privacy notice or want to [exercise your rights](#), please contact us by:

- sending an email to hello@pulsesmarthub.co.uk
- calling us on (+44) 20 7313 9571; or
- writing to us at Pulse Smart Hub, Urban Innovation Company (UIC) Limited, 22 Berghem Mews, Blythe Road, London W14 0HN marking your letter for the attention of Tom Fisher.

4 WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

We collect personal information from you in the following ways:

- **Information you voluntarily provide to us. For more information see below.**

We collect and maintain personal information that you voluntarily submit to us during your use of the Services.

In particular, in order to sign up to use free wi-fi and access the internet we require the following personal information from you:

- *name; and*
 - *email address.*
- **Information we collect through your use of the Services. For more information see below.**

We may collect through our use of cookies, log files and other technologies personal information regarding your mobile device, computer hardware and software used to access the Services.

In particular, when you use our Wi-Fi Services, we may collect the following:

- IP address of device(s) used;
- browser type;
- operating system and device type;
- location of the Pulse providing the Wi-Fi connection;
- access times and dates; and
- data usage of internet services and browsing history.

When you use the Pulse to make telephone calls, we may also collect:

- call history data;
- call duration; and
- the number that has been called.

The Pulses contain 3 cameras. We may collect identity data in the form of video footage from the camera located above the touch point of the Pulse when you use a Pulse to make a telephone call to emergency services (such as 999) and/or release the defibrillator contained in the Pulse.

The other 2 cameras contained in the Pulse are located above the advertising screens and are not currently active. We will update this policy if they are activated.

This personal information allows us to deliver more helpful information, services and tools and helps to prevent misuse of the Pulses. Please see our [Cookie Policy](#) for further information.

5 HOW DO WE USE YOUR PERSONAL INFORMATION?

Our primary goal in collecting personal information from you is to: (i) provide our Services and verify your identity; (ii) help us improve our services and develop and market new services; (iii) carry out requests made by you on the Pulses; (iv) investigate or settle inquiries or disputes; (v) comply with any applicable law, court order, other judicial process, or the requirements of a regulator; (vi) enforce our agreements with you; (vii) protect the rights, property or safety of us or third parties, including our other clients and users of the Pulses; (viii) provide support for the provision of our Services; and (ix) use as otherwise required or permitted by law

In particular, we may use your personal information for the following purposes:

- **Provision of the Services, to communicate with you and for service administration. For more information see below.**

We may use your personal information to:

- Verify who you are in order to enable you to have access to free Wi-Fi and use the internet.

What is our legal basis?

It is a contractual necessity to use your personal information in such a way if you request access to the Wi-Fi.

- Allow you to make telephone calls

What is our legal basis?

It is our legitimate interest to use your personal information in such a way to ensure that we provide the very best service we can to you.

- Allow you to contact emergency services

What is our legal basis?

It is necessary to use your personal information in such a way to protect your vital interests and those of the public. It is also in our legitimate interest to take and store video footage of you when contacting emergency services in order to prevent misuse of the Pulses.

- *Allow you to release and access the Pulse defibrillators*

What is our legal basis?

It is necessary to use your personal information in such a way to protect your vital interests and those of the public. It is also in our legitimate interest to take and store video footage of you when using the Pulse defibrillator in order to prevent misuse of the Pulses.

- **General enquiries. For more information see below.**

Our website features a “Contact Us” page which invites you to submit general enquiries about our Pulses, our organisation and our Services by submitting a message to us and providing your name and email address.

What is our legal basis?

It is in our legitimate interest to use your personal information in the ways described above to ensure that we are able to help you with your enquiry and provide a good standard of service to you.

- **Surveys and feedback. For more information see below.**

From time to time we will contact you to invite you to provide feedback about our Pulses and / or Services in the form of online surveys. Alternatively you may submit queries or feedback to us via the “Contact Us” button on our Pulses. We use this information to help us improve the quality of service provided by us. We also use your feedback to monitor the quality of our services and to assist with the selection of future interactive features and service lines.

What is our legal basis?

It is in our legitimate business interests to use the information you provide to us in your feedback for the purposes described above.

- **User Insights and analysis. For more information see below.**

We analyse your activity and interactions with our Pulses, including your use of our Wi-Fi Services, for insight and analytical purposes.

We may use cookies, log files and other technologies to collect personal information from the device you use to access our Wi-Fi Services. This includes the following:

- an IP address to monitor traffic and volume;
- a session ID to track usage statistics; and
- information regarding your personal or professional interests, demographics, participation habits, experiences with our projects and interactive features.

Our web pages and e-mails may also contain cookies, web beacons and pixel tags (“**Tags**”). Tags allow us to track receipt of an e-mail to you, to count users that have visited a web page or opened an e-mail and collect other types of aggregate information. Once you click on an e-mail that contains a Tag, your contact information may subsequently be cross-referenced to the source e-mail and the relevant Tag.

In some of our e-mail messages, we use a “click-through URL” linked to certain websites administered by us or on our behalf. We may track click-through data to assist in determining interest in particular topics and measure the effectiveness of these communications.

Please see our [Cookie Policy](#) for further information.

This information is used to create profiles and insights about your interaction with the Pulse. Where we have your consent to do so, we will also use your location data for user insight purposes.

What is our legal basis?

Where your personal information is completely anonymised, we do not require a legal basis to use it as the information will no longer constitute personal information that is regulated under data protection laws. However, our collection and use of such anonymised personal information may be subject to other laws where your consent is required. Please see our [Cookie Policy](#) for further details.

Where your personal information is not in an anonymous form, it is in our legitimate interest to use your personal information in such a way to ensure that we provide the very best services to you and our other customers.

- **Internal record keeping and legal compliance. For more information see below.**

We may use your personal information for internal record keeping purposes and to check you comply with the Pulse Smart Hub Terms of Use.

What is our legal basis?

It is in our legitimate interest to ensure that we keep our records up-to-date in order to monitor who uses the Services, to comply with our legal obligations and to monitor your compliance with the Terms of Use.

- **Sharing information with third party processors. For more information see below.**

We may share your personal information with third party processors including but not limited to: members of the Wildstone group, as well as Umbicord Special Projects Limited and Envirowatch Limited, our server hosts from time to time, currently Amazon Web Services Inc, our third party service providers in order to provide the Services and associated products and services to you including but not limited to Best4Biz Ltd T/A B4B who supply the internet services, and project partners such as Visit Belfast.

What is our legal basis?

It is in our legitimate interest to share your personal information in such a way to ensure that we provide the very best service we can to you. Where we share your sensitive personal data, we shall be relying on your consent to do so.

- **Sharing information with professional advisors & potential purchasers. For more information see below.**

We may share your personal information with professional advisers or regulatory authorities:

- *to enable them to process your personal information on our behalf in a manner consistent with this privacy notice;*
- *to comply with our legal obligations;*
- *to enforce our legal rights; or*
- *protect rights of third parties.*

Your personal information may also be shared with prospective buyers if we go through a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.

What is our legal basis?

It is in our legitimate interest to share your personal information with such third parties to enable them to process your information on our behalf, to comply with and/or enforce our legal rights and obligations, to protect the rights of third parties and to facilitate business transitions. Where we share your sensitive personal data, we shall be relying on your consent to do so.

Any other purposes for which we wish to use your personal information will be notified to you either by updating our privacy notice or otherwise from time to time including the legal basis of such use.

6 USE OF COOKIES

The Services may use certain cookies, pixels, beacons, log files and other technologies of which you should be aware. Please see our [Cookie Policy](#) to find out more about the cookies we use and how to manage and delete cookies.

7 THIRD PARTY LINKS AND SERVICES

The Services may contain links to third party websites and services. Please remember that when you use a link to go from Urban Innovation to another website or you request a service from a third party, this privacy notice no longer applies. For more information see below.

Your browsing and interaction on any other website, or your dealings with any other third party service provider, is subject to that website's or third party service provider's own rules and policies.

We do not monitor, control, or endorse the privacy practices of any third parties.

We encourage you to become familiar with the privacy practices of every website you visit or third party service provider that you deal with and to contact them if you have any questions about their respective privacy policies and practices.

This privacy notice applies solely to personal information collected by us through the Services and does not apply to these third party websites and third party service providers.

8 HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We keep your personal information only for as long as necessary to fulfil the purpose it was collected for.

9 CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information you provide us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration. For more information see below.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

All our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of the Services.

10 HOW TO ACCESS YOUR INFORMATION AND YOUR OTHER RIGHTS?

You have the following rights in relation to the personal information we hold about you:

- Your right of access. For more information see below.
If you ask us, we'll confirm whether we're processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- Your right to rectification. For more information see below.
If the personal information we hold about you is inaccurate or incomplete, you're entitled to have it rectified. If we've shared your personal information with others, we'll let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- Your right to erasure. For more information see below.
You can ask us to delete or remove your personal information in some circumstances such as where we no longer need it or you withdraw your consent (where applicable). If we've shared your personal information with others, we'll let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- Your right to restrict processing. For more information see below.
You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It won't stop us from storing your personal information though. We'll tell you before we lift any restriction. If we've shared your personal information with others, we'll let them know about the restriction where possible. If you ask us, where possible and lawful to do so, we'll also tell you who we've shared your personal information with so that you can contact them directly.
- Your right to data portability. For more information see below.
With effect from 25 May 2018, you have the right, in certain circumstances, to obtain personal information you've provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or ask us to transfer this to a third party of your choice.
- Your right to object. For more information see below.
You can ask us to stop processing your personal information, and we will do so, if we're relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;

- Your rights in relation to automated decision-making and profiling. For more information see below.

You have the right not to be subject to a decision when it's based on automatic processing, including profiling, and it produces a legal effect or similarly significantly affects you unless such profiling is necessary for entering into, or the performance of, a contract between you and Urban Innovation.

- Your right to lodge a complaint with the supervisory authority. For more information see below.

If you have a concern about any aspect of our privacy practices, including the way we've handled your personal information, you can report it to the UK Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

11 CHANGE TO THIS PRIVACY NOTICE

We may make changes to this privacy notice from time to time. For more information see below.

To ensure that you are always aware of how we use your personal information we will update this privacy notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We may notify you by e-mail of any significant changes. However, we encourage you to review this privacy notice periodically to be informed of how Urban Innovation uses your personal information.

Last Updated 9 January 2019