

# Reveal Media Privacy Policy



# Data Protection Policy

Description	This Data Protection Policy states our how we process data on behalf of our customers and how as an independent controller, process its own personal data.
Last review or amendment date	12/05/2026
Document Owner	Donna Thompson
Classification	Public-Internal-Restricted-Confidential
Document Ref:	L-CORP-01-V2-DT-DATA PROTECTION-PUB

## Document Amendment History

(Raise version by 1 following an amendment)

Version	Amendment date	Change Notes	Author / Approver
1.0	17/09/2024	Existing policy updated and moved to document register	Donna Thompson/GAP
2.0	07/05/2026	Introduction expanded to give greater context	Donna Thompson/GAP

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## Introduction

Reveal Media Limited (“**Reveal**”, “**we**”, “**us**” or “**our**”) is a company incorporated in England and Wales with company number 04470201. Our registered office is Riverview House, 20 Old Bridge Street, Hampton Wick, KT1 4BU, United Kingdom.

This policy sets out the basis on which we process any personal data we collect from individuals, or that individuals provide to us, or that we obtain from other sources in each case in connection with:

- use of Reveal's websites.
- the purchase of our hardware and software products and/or services.
- the ongoing maintenance or repair of our hardware and software products and/or services.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity of the data subject has been irreversibly removed (anonymous data).

We are committed to maintaining the privacy and protection of all personal data that we process in connection with our business. If you have any questions regarding our privacy policy, please contact us (our contact details are set out in section 13).

## Scope

All activities carried out by Reveal Media staff and workers under UK jurisdiction.

## Policy statement

### PART 1: Where Reveal acts as a processor on behalf of its customers

#### 1. PROCESSING PERSONAL DATA ON BEHALF OF OUR CUSTOMERS

When our customers (companies, public bodies, emergency services etc.) use our services and products, for example to capture and process body worn camera footage, such footage and related data may include the personal data of members of the public. We provide our services as a processor on behalf of our customers acting as the controller of this information. This means that we only process personal data on behalf of our customers and as per their instructions. The customer, as the controller, is responsible for determining how the footage and related data is captured, processed, and deleted and to ensure there is a lawful basis for its use. If you have any specific queries or concerns about how such footage and related data is being handled, please contact the relevant organisation (our customers) in their capacity as a controller.

## PART 2: Where Reveal is an independent controller of its own personal data

### 2. BASIS FOR PROCESSING PERSONAL DATA

- 2.1 Sections 2.2 – 2.7 below explain how and why we process an individual's personal data as an independent controller, as well as the legal basis on which this processing is carried out.
- 2.2 For customer services support: We may process personal data in order to provide various supporting customer services to individuals (such as individuals who work for and on behalf of our customers and where those individuals contact us with a question in connection with a product or service and/or requests certain information from us). We may also process personal data in respect of these individuals in order to carry out repairs or ongoing maintenance at their request on the software or hardware we have provided.

The legal basis on which we process an individual's personal data in these circumstances is performance of our contractual obligations with customers which include dealing with customer service requests, responding to communications and solving customers' issues. If an individual does not provide us with the personal data we request from them for customer services purposes, we may not be able to fully answer their queries.

- 2.3 To make our website better: We may process an individual's personal data in order to provide such individual with a more tailored user experience, including using their personal data to make sure our website is displayed in the most effective way for the device such individual is using. This processing means that an individual's experience of our site will be more tailored to them, and that the products an individual sees on our site may differ from someone accessing the same site with a different purchase history or browsing habits. We also use various cookies to help us improve our website (more details are set out in section 5) and share an individual's personal data with the third-party analytics and search engine providers that assist us in the improvement and optimisation of our website. Please see our cookie notice for further details.

We will also process personal data for the purposes of making our website more secure, and to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

The legal basis on which we process personal data in these circumstances is legitimate interest where the use of cookies is strictly necessary and consent for any additional non-essential cookies.

#### 2.4 **For marketing purposes:** Where:

- 2.4.1 individuals have expressly opted in to receive marketing communications from us, we will process their personal data to provide such individual with marketing communications in line with the preferences they have provided.
- 2.4.2 individuals have expressly opted in via our site to receive marketing communications from a third party, we will process such individual's personal data by transferring it to the relevant third party.

An individual is not under any obligation to provide us with their personal data for marketing purposes, and individuals can withdraw their consent to their personal data being processed in this way at any time by contacting us (please

see section 13) or, where relevant, by following the unsubscribe link in every marketing communication individuals receive from us. If an individual does choose to withdraw their consent, this will not mean that our processing of such individual's personal data before they withdrew their consent was unlawful.

- 2.5 **If our business is sold:** We may transfer individual personal data to a third party:
- 2.5.1 in the event that we sell or buy any business or assets, in which case we will disclose personal data to the prospective seller or buyer of such business or assets (at all times in accordance with all applicable data protection laws); or
  - 2.5.2 if Reveal Media Limited or substantially all of its assets are acquired by a third party, in which case personal data held by Reveal Media Limited about its customers (including those individuals who work for and on behalf of our customers) will be one of the assets transferred to the purchaser,

in each case, the legal basis on which we process data in these circumstances is our legitimate interest to ensure our business can be continued by a purchaser. If individuals object to our use of personal data in this way, the relevant seller or buyer of our business may not be able to provide the applicable products and/or services.

- 2.6 **To notify individuals of changes to our privacy policy:** We may process personal data in order to update individuals to any changes made to our privacy policy (more details are set out in section 12).

The legal basis on which we process personal data in these circumstances is our legal obligation to remain transparent in our use of individuals' personal data and to ensure individuals are kept updated on how and why we process their personal data.

- 2.7 In certain circumstances we may also need to share personal data if we are under a duty to disclose or share personal data in order to comply with any legal obligation.

### 3 CATEGORIES OF INFORMATION WE COLLECT FROM INDIVIDUALS

- 3.1 We will collect and process the following personal data.
- 3.2 **Information individuals give us:** Individuals (such as individuals working for and on behalf of a customer) may provide their personal information when making enquiries about and purchasing our products and/or services, filling in forms on our website, corresponding with us about repairs or maintenance of our products and/or services or other general correspondence with us by phone, e-mail or otherwise.
- 3.3 **Online information we collect:** With regard to visits to our website we may automatically collect the following information:
- 3.3.1 technical information, including the Internet protocol (IP) address used to connect an individual's computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and

versions, other hardware information, domain name, operating system and platform and possibly other software information.

- 3.3.2 information about an individual's visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our website (including date and time), products viewed or searched for, 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.
- 3.4 Information we receive from other sources: We may receive information about an individual through the use of our website or through use of the other services we provide. We work closely with third parties (including, companies who provide us with marketing lists, as well as other business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies and hosting providers) from whom we may also receive information about individuals.
- 3.5 We do not process (as a controller) any special categories of personal data, meaning personal data revealing:
  - 3.5.1 racial or ethnic origin.
  - 3.5.2 political opinions; religious or philosophical beliefs or trade union membership.
  - 3.5.3 genetic or biometric data that uniquely identifies you; or
  - 3.5.4 data concerning your physical or mental health, sex life or sexual orientation.

However, our customers may process and ask us to process this type of data on their behalf in their capacity as a controller (Please see Part 1).

- 3.6 We do not collect data relating to criminal convictions or offences or related security measures.

## **4 CATEGORIES OF RECIPIENTS OF PERSONAL DATA**

### **Sharing with other controllers (Recipients)**

- 4.1 When we share personal data with third parties acting as controllers, we take adequate steps to ensure that we only share data with third party recipients who meet our privacy standards.

### **Sharing with our vendors (Processors)**

- 4.2 When we engage a third-party processor, we take adequate steps to ensure the data is processed at an equal standard to us.
- 4.3 An individual's personal data may be shared by us with third party processors who provide support integral to the provision of our products and services and enable us to operate our business. These include:
  - 4.3.1 A service provider who provides us with support for non-evidential and evidential hardware repair services and customer support. The

information we provide to this service provider includes contact details of individuals who work for and on behalf of our customers.

- 4.3.2 A service provider who provides data loader software for our Customer Relationship Management System which allows us to securely import and export data to our outsourced repair centre.
- 4.3.3 Other cloud storage providers who provide cloud storage services to enable us to provide our customers with a digital evidence management solution.

If further information on the above-mentioned service providers is required, please contact us directly (please see section 13).

- 4.4 We may share an individual's personal data with external third parties who provide marketing and software services, as set out in section 2.4. These parties include the following:

- 4.4.1 The provider of our Customer Relationship Management System. Our data is hosted in the UK.
- 4.4.2 The provider of our Media Hub. Our data is hosted in the EU.

If further information on the above-mentioned service providers is required, please contact us directly (please see section 13).

## 5 COOKIES

Our website uses cookies to distinguish individuals from other users of our website. This helps us to provide individuals with a good experience when they browse our website and also allows us to improve our website. By continuing to browse the website, users are agreeing to our use of cookies. Please refer to our cookie notice for further details and information in relation to our use of cookies.

## 6 USES MADE OF THE INFORMATION

- 6.1 We collect and process information individuals provide to us using our Customer Relationship Management System. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).
- 6.2 The transmission of information via the internet is not completely secure. Although we will do our best to protect an individual's personal data, we cannot guarantee the security of data transmitted to our website; any transmission is at the individual's own risk. Once we have received an individual's information, we will use strict procedures and security features to try to prevent unauthorised access.

## 7 WHERE WE STORE PERSONAL DATA

- 7.1 Our customers may be based outside the United Kingdom (UK) or the European Economic Area (EEA) so processing of individuals' personal data will involve the transfer and storage of data outside the UK and/or the EEA. Some of our suppliers are based outside the UK and/or EEA.
- 7.2 Whenever we transfer personal data out of the EEA or the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- 7.2.1 We will only transfer personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission, or, where applicable, the UK ICO.
- 7.2.2 Where we use certain service providers, we may use specific contracts approved by the European Commission or, where applicable, the model contracts as approved by the UK ICO.
- 7.3 If further information on the specific mechanism used by us when transferring an individual's personal data out of the EEA or UK is required, please contact us directly (please see section 13).

## **8 PERIOD OF STORAGE**

- 8.1 Where an individual orders goods and/or services from us, we will retain their data for a period of 6 (six) years after the goods were delivered and/or the services performed, to ensure that we are able to assist such individual should they have any questions or feedback in relation to our goods and/or services or to protect or defend our legal rights.
- 8.2 Where we have processed an individual's personal data to provide them with marketing communications with consent, we may contact such individual at least every twelve (12) months to ensure they are happy to continue receiving such communications. If an individual tells us that they no longer wish to receive such communications, their personal data will be removed from our lists.
- 8.3 Where we have processed an individual's data for any other reason (such as where they have contacted us with a question in connection with our goods and/or services), subject to section 8.1, we will retain their data for twelve (12) months.

## **9 KEEPING YOUR DATA SECURE**

All information individuals provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given an individual (or where the individual has chosen) a password which enables access to certain parts of our website, the individual is responsible for keeping this password confidential and must not share this password with anyone.

## **10 AN INDIVIDUAL'S OTHER RIGHTS UNDER DATA PROTECTION LAWS**

- 10.1 As a data subject, you may exercise the following rights:
- 10.2 you may access your data and be informed about the processing (right of access).
- 10.3 you may request rectification of your personal data. This right entitles you to have your personal data corrected if it is inaccurate or incomplete.
- 10.4 in certain cases, you may request the erasure of your personal data (right "to be forgotten");
- 10.5 in certain cases, you may request restriction of the processing of your personal data. This right entitles you to request that we only process your personal data in limited circumstances.
- 10.6 in certain cases, you exercise the right to data portability; and

10.7 you may object to data processing. This right entitles you to request that we no longer process your personal data; and lodge a complaint with your local Data Protection Authority.

## 11 LINKS ON OUR WEBSITE

Our websites may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. Our service connects individuals to different websites. If individuals follow a link to any of these websites or use their service, please note that the individual has left our website, and these websites have their own privacy policies. We do not accept any responsibility or liability for these policies or websites. Please check these policies before submitting any personal data to these websites.

## 12 CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this webpage and, where appropriate, notified to individuals by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## 13 CONTACT

Questions, comments, and requests regarding this privacy policy are welcomed.

Individuals can contact us by telephoning +44 (0) 203 890 2005 or by writing to us at [legal@revealmedia.com](mailto:legal@revealmedia.com)

Our Data Protection Officer, Donna Thompson, can be contacted by telephone on

+44 (0)203 890 2005 or by emailing: [dpo@revealmedia.com](mailto:dpo@revealmedia.com)

