

## FRONTLINE PRIVACY NOTICE (“NOTICE”)

This Privacy Notice addresses how Frontline Security Solutions Limited, Littleton Road, Ashford, Middlesex TW15 1TZ ("Frontline") may collect and process personal information from you, separate and apart from its websites and mobile applications. The privacy notice for the Frontline website is available on that particular website.

Frontline interacts with individuals in a variety of ways: employees of Frontline customers, contact persons of Frontline customers and end users of Frontline products and services. To enable these interactions, Frontline is collecting and processing personal information. Frontline has implemented technical, organizational, administrative, and physical measures to safeguard any personal information Frontline may process. As this Notice is intended to cover a variety of situations, some information in this Notice may not apply to you.

This Notice may be modified from time to time without prior notice. Please review this Notice on a regular basis for any changes. The effective date of the current version appears at the end of this Notice.

### What personal information might Frontline collect?

The personal information that Frontline collects is subject to applicable legal and contractual requirements. Because this Notice covers a wide variety of situations, there may be data elements listed here that do not apply to your specific situation. Please contact Frontline if you have any questions.

#### Type of personal information:

Name and salutation (such as Mr. or Mrs.)
Emergency contact information
Work contact information, including telephone number, email address, mailing address, and work location
Home address, personal email address and home telephone number, including personal mobile telephone number
Information about an individual’s employer, including company name(s), company location(s), company address(es), and country of incorporation
Job title, department and job function
Visitor information, including the time of arrival and departure, date, name visitor, name company, location of visits, information regarding the vehicle for parking purposes, information required for a badge (which may include a photograph), visitor’s signature and information necessary to maintain visitor logs and screening
Payment and invoice-related information, including identification and bank account numbers
Information collected through a voluntary survey or promotional campaign
Record of any incident that occurs while on Frontline premises
Information that may be collected as part of the execution of the contract, such as time and attendance data, badge information, photographs, audio, video, or geolocation data used for a particular role or assignment
Government-issued identification numbers (in whole or in part), such as a tax identification number, VAT number
Information provided to facilitate a service or request assistance, such as product use or problem information
Information required to process a claim or any information that a person chooses to include in a document that is part of a legal proceeding involving Chubb

Live video images when responding to alarm triggering events, and audio recordings
In case of IP connections with the Frontline alarm center: IP addresses are stored
In case of Frontline’s Tracking & Tracing services: location is stored
In case of Frontline’s video services: username / password, IP addresses and video images are stored
For the Alarm Processing System: the log book is stored (and in some cases access information)
In case of monitoring of (ex) prisoners: criminal background info might be stored
Information regarding health and injuries, such as disability, sickness, accident related info, and other related information that may be part of video images, recorded conversations, and actions linked to responding to alarm triggering events

**How might FRONTLINE use the personal information it collects?**

**Purpose:**

Conducting regular business operations, including designing and developing products, managing an Enterprise Resource Planning (ERP) system, sending invoices and collecting payment, providing payment, and providing goods and services to customers, which may include sharing limited personal information with customers or other business partners
Providing requested products and services, which may include use of geolocation for certain applications in a known and transparent manner
Managing communications and notices
Managing physical security, including access controls and security, facility access and safety, and disaster preparedness
Responding to alarm triggering events
Overseeing location tracking, duration, and other telematics of certain Frontline assets and applications for management of services provided, security, safety, and efficiency
Ensuring compliance with import, export, and other international trade controls, including screening for sanctioned or restricted countries or parties
Performing audits and compliance reviews to ensure compliance with applicable policy, regulation, and law
Conducting and managing internal and external investigations, including Legal, Global Ethics & Compliance, and International Trade Compliance reviews and any resulting disclosures to government agencies
Evaluating and reporting conflicts of interest
Addressing environmental, health, and safety issues, including injury and damage claims
Prosecuting and defending claims in litigation, arbitration, administrative, or regulatory proceedings, including but not limited to pre-dispute activity, evidence collection, discovery, litigation holds and e-discovery efforts
Responding to law enforcement and other government inquiries
Administering of marketing, contract, joint ventures, and other business efforts, including without limitation invoice and payment processing, project management, and customer surveys and promotions
Designing, selling, producing, and improving products
Providing customer service and support
As required or expressly authorized by applicable law or regulation
For training of Frontline employees and quality purposes of Frontline products and services

- The Alarm Processing System
  - For alarm processing of incoming alarms (log book is stored and in some cases access information)
  - National Response whereby a security agency is getting orders from Frontline (e.g. by checking on the location in case of an alarm) and whereby the name, address and telephone number of the customer can be provided
- Video platforms
  - To be able to assess the video images
  - In case of an alarm, Frontline employees and the local police can watch “live” video images
- ERP system
  - For the contract administration and invoicing
- Tracking & Tracing application
  - For locating
- Teleservice application
  - For handling incoming messages at the teleservices
- Archive
  - For storage of the customer's file

Responding to situations involving a risk of health or safety, including an emergency and accident

### **With whom might Frontline share the information it collects?**

Frontline will not sell or otherwise share your personal information outside Frontline except to:

- Carrier group companies, on a strict ‘need to know’ basis (e.g. for internal audit purposes), and based on the Binding Corporate Rules;
- Service providers Frontline has retained to perform services on Frontline behalf. Frontline will only share your personal information with service providers with whom Frontline has signed a processing agreement except as necessary to perform services on Frontline behalf or to comply with legal requirements, including but not limited to in response to a legitimate legal request from law enforcement authorities or other government regulators;
- Investigate suspected or actual illegal activity;
- Prevent physical harm or financial loss; or
- Support the sale or transfer of all or a portion of Frontline business or assets, including through bankruptcy.

### **Where does Frontline store your personal information?**

Frontline stores your Personal Information in United Kingdom. Personal Information may also be stored worldwide, however there are Binding Corporate Rules or Data Transfer Agreements in place should the information be shared. Further, for customer and visitor screening, the control is carried out via an automated database of one of Frontline’s service providers currently located in the United States. Frontline has signed a data transfer agreement with the service provider to guarantee the protection of the data.

### **How long does Frontline retain Personal Information?**

Frontline retains personal information for the length of time required to fulfil the purpose for which it was originally collected and for any additional period as required by applicable law or regulation, court, administrative or arbitration proceedings, or audit requirements.

## What choices do you have about how Frontline uses your personal information?

Frontline will use your personal information for executing its contractual obligations towards its customers and business partners.

You will always have a choice about whether Frontline uses your personal information for direct marketing purposes. If you have provided Frontline with your personal information and would now like to request that it is no longer used for marketing purposes, please contact [privacy@chubb.co.uk](mailto:privacy@chubb.co.uk).

You have the right to lodge a complaint with the Information Commissioner's Office. You also have the right to withdraw consent, to request access to and correction or erasure of your personal information, seek restrictions on or object to the processing of certain personal information, and seek data portability under certain circumstances. To contact Frontline regarding the above, please email [privacy@chubb.co.uk](mailto:privacy@chubb.co.uk).

## How can you contact Frontline?

If you wish to access, correct or update your personal information, or if you have questions about Frontline's privacy practices in general or a complaint, please email [privacy@chubb.co.uk](mailto:privacy@chubb.co.uk).

Last Updated: 10 December 2020