

## TapSOS Privacy Policy

### 1. Keeping your data safe

- 1.1. We are committed to keeping your personal data safe and secure and handling it in accordance with our legal obligations. This Privacy Policy sets out in detail the purposes for which we process your personal data, who we share it with, what rights you have in relation to that data and everything else we think it's important for you to know.

### 2. Who's in control of my personal data?

- 2.1. The TapSOS website and app are run by TapSOS Limited (**we, us, our**). We are the "controller" of the personal data that we collect and process for the purposes of providing TapSOS and for any other purposes set out in this Privacy Policy. This means that we are responsible for deciding how and why your data is used and for ensuring that your data is handled legally and safely.

### 3. What data do you collect and where from?

- 3.1. We collect the following personal data from you when you set up an account with the app (**Account Information**):
  - 3.1.1. your full name;
  - 3.1.2. your email address; and
  - 3.1.3. a password.
- 3.2. Once you have set up an account, we collect the following personal data to enable you to set up your profile (**Profile Information**):
  - 3.2.1. date of birth;
  - 3.2.2. gender;
  - 3.2.3. telephone number; and
  - 3.2.4. address.
- 3.3. Our app will also ask you to input medical information, such as your blood type, whether you are an organ donor, any medication you are on and any disabilities you have, for example if you are deaf (**Medical Information**). This information is collected to be passed on to the emergency services as they need it to handle the situation appropriately. It can also assist emergency responders at the scene if you are unable to give them this information. Medical Information is currently stored on your device only and we do not have access to, or store, Medical Information.
- 3.4. When you create an alert, you will be asked to select which service you require, confirm your location, select the appropriate icon(s) to describe the incident and answer some questions about the situation (**Alert Information**). This is information that we have to collect in accordance with 999 protocols. This information, together with your Medical Information, is then populated into a text message that is sent to a BT call handler to pass on to the 999 service. As with Medical Information, we do not see the content of any alert or text message and this is stored on your device rather than stored with us.
- 3.5. Once an alert has been sent, we keep a record of the fact that an alert has been sent and the mobile number from which it was sent (**Alert History**). Your Alert History is not linked to your account and does not include the content of the relevant alert.
- 3.6. If you sign up for our mailing list on our website, we will collect your name and email address.

- 3.7. We will collect personal data from you if you contact us by post, email, telephone or social media with comments, queries or complaints. This will include your name, contact details and any other personal data you provide to us in your correspondence.
- 3.8. We collect technical information about how you use TapSOS. This includes your IP addresses, device identifiers and information about how long you have stayed on certain pages or what pages you have clicked on. We use cookies to do this – please see our Cookies Policy for more information.

#### **4. What do you use my personal data for?**

- 4.1. We use your Account Information and your Profile Information to:
  - 4.1.1. set up, manage and administer your account and your profile;
  - 4.1.2. log you into the app;
  - 4.1.3. allow you to use all the features of the app that are available to you;
  - 4.1.4. verify your identity and monitor account set-up;
  - 4.1.5. pass your details on to the 999 service when you create an alert so that 999 can deal with the alert appropriately; and
  - 4.1.6. ensure that your account, your profile and your personal data are kept secure.
- 4.2. Alert Information and Medical Information is passed on to the emergency services together with your Profile Information so that the 999 service can identify you and deal appropriately with the situation.
- 4.3. If you misuse our app in any way (for example by making hoax alerts to 999), we will monitor your usage of the app and we may be asked to pass on your details to the police and/or to investigate your app usage further. If we are satisfied that we are legally allowed to pass your details on we will do so. This could result in 999 blocking or barring your number as a result of illegal activity (this is a decision made by 999 and not by us).
- 4.4. We use your telephone number to register you with BT's emergencySMS service. This is required to enable you to use TapSOS.
- 4.5. We use your email address to contact you occasionally with service messages about TapSOS, for example to provide you with password reminders.
- 4.6. We store your Alert History to ensure that we have a record of the alerts created through the app and for our own record-keeping and audit purposes.
- 4.7. We use information you voluntarily provide to us when contacting us with queries, comments or complaints to enable us to respond to those queries, complaints or comments and to make sure that these are appropriately dealt with.
- 4.8. We use your personal data, including the technical data that we collect, to help us monitor, analyse and improve TapSOS to ensure that we are providing you with the best possible service.

#### **5. Marketing**

- 5.1. We will use your name and email address to send you marketing communications in the following circumstances:
  - 5.1.1. if you proactively sign up to our mailing list on our website; and/or
  - 5.1.2. if you provide your consent to receive marketing communications when you sign up for an account on our app.

- 5.2. If you sign up to receive information about our own products and services, we will send you newsletters and product updates from time to time. We also sometimes use other personal data we hold about you to decide if particular marketing is relevant to you. For example, if we present at an event that is aimed at the deaf community, we will only send information about the event to you if you have told us that you are deaf.
- 5.3. We never share your information with third parties for marketing purposes. However, we sometimes partner with other organisations to market their products and services on their behalf. If this is the case and you have signed up to receive this kind of marketing, we will use other information that we hold about you to make sure that the information we send you is relevant and useful to you. For example, if we partner with a hearing aid provider and you have told us that you are deaf, we could send you marketing messages that include information about that provider's products.
- 5.4. You can opt out of marketing at any time by clicking "unsubscribe" in any marketing communications. Please note that unsubscribing from marketing of our own products and services will not unsubscribe you from marketing about third party products and services, and vice versa. If you want to unsubscribe from all marketing, you will need to opt out of both types of marketing.

**6. What happens if I don't provide my personal data?**

- 6.1. If you do not provide the personal data that we request, you will not be able to set up an account with us or use TapSOS.

**7. What is your legal basis for using my personal data?**

- 7.1. Data protection law says that we have to tell you the "legal basis" that we rely on to process your personal data for the purposes that we have notified to you. The "legal basis" is our lawful justification for processing your personal data. The table below tells you what that legal basis is in relation to each of the purposes set out above.
- 7.2. Where the table below state that we process personal data because it is in our "legitimate interests" to do so, you should note that you have a right to object to us processing your personal data for those purposes. However, this is a limited right and we will not need to comply with your request if we have compelling legitimate grounds to continue processing your personal data for those purposes. You should also be aware that if we stop processing your personal data for those purposes, you will not be able to use TapSOS for its intended purposes.

Purpose	Personal data used	Legal basis
Running your account and allowing you to access and use TapSOS, including contacting you with service messages and registering you with emergencySMS	Account Information and Profile Information	We process this personal data for this purpose on the basis that this information is necessary in order to perform our contract with you to provide your account and to allow you to use the TapSOS app.

Allowing alerts to be sent to 999 via BT call handlers and providing 99 with all information required to handle the alert	Alert Information and Medical Information	We process this personal data for this purpose on the basis that this information is necessary in order to perform our contract with you to allow you to use TapSOS to send 999 alerts.
Allowing emergency responders at the scene to obtain key information about you if you are not able to provide it	Medical Information	We process this personal data for this purpose on the basis that it is in our, your and the 999 service's legitimate interests to do so. We have an interest in ensuring the safety and welfare of users of the app. You have a legitimate interest in inputting this data into the app so that the 999 service and emergency responders can act in the most appropriate way when they respond to an emergency. The 999 service has an interest in receiving this data so that they can ensure the situation is handled appropriately.
Record-keeping and audit	Alert History	We process this personal data for this purpose on the basis that it is in our legitimate interests to do so. We have an interest in making sure that accurate records are kept of activity on the app so that we can keep a log of how often and how effectively the app is being used and so that we can deal with any queries or issues regarding previous alerts.
Marketing our own products and services	Name and email address	We process this personal data for this purpose on the basis that it is in our legitimate interests to do so. We have an interest in promoting our app and our business. You can opt out of receiving marketing at any time by clicking "unsubscribe" in any marketing communication.
Marketing products and services from other companies and deciding what products and services are relevant or interesting to you	Other personal data, such as age, gender and disability information	We process this personal data for this purpose on the basis that we have your consent to do so. Your consent is obtained when you sign up for marketing of third party products and services. You can withdraw your consent at any time by clicking "unsubscribe" in any marketing communication.
Contacting you in response to correspondence you send us	Name, email address, telephone number and any other personal data you voluntarily provide when you contact us	We process this personal data for this purpose on the basis that it is in our legitimate interests to do so. We have an interest in ensuring that correspondence, comments and queries are dealt with effectively and appropriately so that we can preserve our business reputation and continue to improve our business.

Improving our services	The technical information that we collect about your device and how you use the Website	We process this personal data for this purpose on the basis that this information is necessary for our legitimate interests. We have an interest in ensuring that we continue to improve our app and website and provide our users with the best and most effective service possible.
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## 8. Special category personal data

- 8.1. Medical Information and Alert Information both contain "special category personal data". This is personal data that is more sensitive, such as health information, and therefore requires a higher level of protection under data protection law.
- 8.2. As set out above, we do not have access to or store Medical Information or Alert Information; both of these are stored on your device. However, because we have designed our app to request and collect this information, it is important that we tell you the basis on which this information is collected.
- 8.3. Alert Information and Medical Information is collected because this is necessary in your, or someone else's, vital interests. Our app is intended for use in emergency situations when life or health is in danger. This information therefore needs to be collected to allow the 999 service to respond appropriately to the emergency and to preserve life or health.

## 9. Who do you share my personal data with?

- 9.1. We need to share your personal data with some third parties in the following circumstances:
  - 9.1.1. We share your telephone number and your name with BT to register you with BT's emergencySMS service. This is a requirement to enable you to use TapSOS.
  - 9.1.2. Some of our third party suppliers will be able to access your personal data when they perform services for us. The only third party suppliers we currently use who have access to your personal data are as follows:
    - (a) our website and app designer and developer; and
    - (b) our hosting provider, Microsoft Azure (which hosts your personal data for us on servers within the EU).

We have made sure that we have robust contracts in place with these suppliers requiring them to handle personal data safely and in accordance with all legal obligations.
- 9.2. When you create an alert, the alert (including the relevant Alert Information and Medical Information) will be sent to a BT call handler, who will then send it to a localised 999 service to enable emergency responders to respond to your alert. The BT call handler and the emergency responders will be able to see the Alert Information and Medical Information, as well as the fact that the alert has come from a TapSOS user. This is to enable them to respond in the most appropriate way. Please note that, as set out above, we do not currently have access to the Alert Information or Medical Information. Medical Information may also be accessed by emergency responders at the scene if they access your device and the app in a situation where you are unable to give them relevant information about yourself.
- 9.3. We will also share your personal data with third parties in the following circumstances:
  - 9.3.1. where you have specifically consented to us sharing your data with a particular third party;

- 9.3.2. where we are required or permitted to do so by law or to protect or enforce our rights or the rights of any third party; and
- 9.3.3. if our business or any part of it is acquired by a third party, in which case we will need to share your personal data with that third party.
- 9.4. We do not transfer or store your personal data outside the UK and the European Economic Area (**EEA**). If we do transfer your data outside the EEA, we will inform you and we will ensure that equivalent protections to those in the UK are put in place to protect your personal data.

## **10. How long do you keep my personal data for?**

- 10.1. As set out above, we do not store Alert Information and Medical Information. We will keep your Account Information and your Profile Information for as long as your account remains open. You can close your account at any time by contacting us in accordance with the process set out in our Terms and Conditions. Once your account has been closed, we will erase your Account Information and Profile Information, unless we need to keep this data in order to respond to any complaints or claims that you make (in which case we will only keep the data for as long as we need to in order to fulfil those purposes).
- 10.2. We will retain Alert History for 7 years from the date of the relevant alert. Your Alert History is not linked to your account.
- 10.3. We will keep records of any correspondence that we have with you for 7 years from the date of the relevant correspondence.
- 10.4. If you have signed up to our mailing list, we will keep your name and email address until you unsubscribe. When you close your account, we will give you the option to unsubscribe from our mailing lists.

## **11. What rights do I have?**

- 11.1. You have a number of rights under data protection law. These rights and how you can exercise them are set out in this section. We will normally need to ask you for proof of your identity before we can respond to a request to exercise any of the rights in this section and we may need to ask you for more information, for example to help us to locate the personal data that your request relates to.
- 11.2. We will respond to any requests to exercise your rights as soon as we can and in any event within one month of receiving your request and any necessary proof of identity or further information. If your request is particularly difficult or complex, or if you have made a large volume of requests, we may take up to three months to respond. If this is the case we will let you know as soon as we can and explain why we need to take longer to respond.
- 11.3. If you want to exercise any of these rights, please email us at [mydata@tapsos.com](mailto:mydata@tapsos.com).
- 11.4. A right to access your information
  - 11.4.1. You have a right to ask us to send you a copy of all the personal data that we hold about you (subject to some exceptions).
- 11.5. A right to an electronic copy of your information
  - 11.5.1. You can also ask us to send you the Account Information and Profile Information we hold about you in a common electronic format, or to ask us to transfer that data to a third party if you want us to and if it is technically feasible for us to do so.
- 11.6. A right to object to us processing your information
  - 11.6.1. You have a right to object to us processing any personal data that we process where we are relying on legitimate interests as the legal basis of

our processing. If we have compelling legitimate grounds to carry on processing your personal data, we will be able to continue to do so.

- 11.7. A right to ask us not to market to you
  - 11.7.1. You can ask us not to send you direct marketing. You can do this by following the "unsubscribe" instructions in any marketing emails.
- 11.8. A right to have inaccurate data corrected
  - 11.8.1. You have a right to ask us to correct inaccurate data that we hold about you. If we are satisfied that the new data you have provided is accurate, we will correct your personal data as soon as possible.
  - 11.8.2. You can update your own Account Information, Profile Information and Medical Information at any time through your account settings. It is your responsibility to ensure that your personal data is accurate and up-to-date.
- 11.9. A right to have your data erased
  - 11.9.1. You have a right to ask us to delete your personal data in certain circumstances, for example if we have processed your data unlawfully or if we no longer need the data for the purposes set out in this Privacy Policy.
  - 11.9.2. We will delete the personal data associated with your account as set out under "How long do we keep your data for?" above. Remember that you can close your account at any time.
- 11.10. A right to have processing of your data restricted
  - 11.10.1. You can ask us to restrict processing of your personal data in some circumstances, for example if you think the personal data is inaccurate and we need to verify its accuracy, or if we no longer need the data but you require us to keep it so that you can exercise your own legal rights.
  - 11.10.2. Restricting your personal data means that we only store your personal data and don't carry out any further processing on it unless you consent or we need to process the data to exercise a legal claim or to protect a third party or the public.
- 12. Do you use cookies?**
  - 12.1. Like most websites and apps, TapSOS uses cookies to improve performance. Please see our Cookies Policy for more information.
- 13. How can I contact you?**
  - 13.1. If you have any questions or concerns about this Privacy Policy and/or our processing of your personal data, you can contact us at [mydata@tapsos.com](mailto:mydata@tapsos.com).
- 14. What if I have a complaint?**
  - 14.1. You have a right to complain to the Information Commissioner's Officer (**ICO**), which regulates data protection compliance in the UK, if you are unhappy with how we have processed your personal data.
  - 14.2. You can find out how to do this by visiting [www.ico.org.uk](http://www.ico.org.uk).
- 15. What if this policy changes?**
  - 15.1. We may make changes to this Privacy Policy from time to time. Any changes we make will be posted on this page. We may also notify you by email if significant changes are made.