

Smartwatch, Inc. (“Smartwatch,” “SW,” “we,” “us,” “our,” or the “Company”) is committed to protecting the privacy of individuals who visit the Company’s Websites (“Visitors”), individuals who register to use the Services as defined below (“Customers”), and individuals who register to attend the Company’s corporate events (“Attendees”), our staff (“Employees”) and sub-contractors (“Suppliers”). This Privacy Statement describes Smartwatch’s privacy practices in relation to the use of the Company’s Websites and the related applications, services, and programs offered by Smartwatch (collectively, the “Services”), as well as individuals’ choices regarding use, access and correction of personal information.

If you have questions or complaints regarding Smartwatch’s Privacy Statement or associated practices, please contact [info@smartwatchsolutions.co.uk](mailto:info@smartwatchsolutions.co.uk). If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our DPO at the bottom of this policy.

## 1. Services covered

This Privacy Statement covers the information practices, including how the Company collects, uses, shares and secures the personal information you provide, of Websites that link to this Privacy Statement (collectively referred to as “Smartwatch’s Websites” or “the Company’s Websites”).

Smartwatch’s Websites may contain links to other Websites. The information practices or the content of such other Websites is governed by the privacy statements of such other Websites. The Company encourages you to review the privacy statements of other Websites to understand their information practices.

## 2. Information collected

When expressing an interest in obtaining additional information about the Services, or registering to use the Websites or other Services, or registering for an event, Smartwatch requires you to provide the Company with personal contact information, such as name, company name, address, phone number, and email address (“Required Contact Information”). When purchasing the Services or registering for an appointment, Smartwatch may also require you to provide the Company with financial qualification and billing information, such as billing name and address, credit card number, and the number of employees within the organization that will be using the Services (“Billing Information”). Smartwatch may also ask you to provide additional information, such as company annual revenues, number of employees, or industry (“Optional Information”). When Visitors apply for a job with the Company, Smartwatch may also require you to submit additional personal information as well as a resume or curriculum vitae (“Applicant Information”). We also may store as part of our service details on your customers and employees including special categories of data. We retain this information in line with our retention policy which is available on request.

Required Contact Information, Billing Information, Applicant Information, Optional Information and any other information you submit to Smartwatch to or through the Services are referred to collectively as “Data.”

As you navigate the Company's Websites, Smartwatch may also collect information through the use of commonly-used information-gathering tools, such as cookies and Web beacons ("Web Site Navigational Information"). Web Site Navigational Information includes standard information from your Web browser (such as browser type and browser language), your Internet Protocol ("IP") address, and the actions you take on the Company's Websites (such as the Web pages viewed, and the links clicked).

Through our "import contacts" feature option, we may also collect information such as the name, company name, address, phone number or email address of contacts that you choose to share with us. When you provide us with personal information about your contacts, we will only use this information for the specific reason for which it is provided, such as to add new records to your Smartwatch account.

For Subcontractors driving our vehicles we collect your personal details such as driving licence number and retain a copy on file for our legal obligations.

### 3. Use of information collected

The Company uses Data about Smartwatch Customers to perform the services requested. For example, if you fill out a "Contact" Web form, the Company will use the information provided to contact you about your interest in the Services.

The Company also uses Data about Smartwatch Attendees to plan and host corporate events, host online forums and social networks in which event Attendees may participate, and to populate online profiles for Attendees on the Company's Websites. Additional information on the Company's privacy practices with respect to Data about Smartwatch Attendees may be found in additional privacy statements on the event Websites, as the case may be. Please see here for more information on bulletin boards, blogs or chat rooms provided by Smartwatch in connection with its corporate events.

The Company may also use Data about Smartwatch Customers and Attendees for marketing purposes. For example, the Company may use the information you provide to contact you to further discuss your interest in the Services and to send you information regarding the Company, its affiliates, and its partners, such as information about promotions or events.

Smartwatch may also receive information about Customers and Attendees from other sources, including third parties from whom we have purchased data, and combine this information with Data we already have about you. This helps us to update, expand and analyze our records, identify new customers, and create more tailored advertising to provide products and services that may be of interest to you.

Smartwatch uses Web Site Navigational Information to operate and improve the Company's Websites. The Company may also use Web Site Navigational Information alone or in combination with Data about Smartwatch Customers and Data about Smartwatch Attendees to provide personalized information about the Company.

Smartwatch are required to pass guards information (both sub contract and employed guards) personal details including SIA number, Photo, Name and contact details to customers in order to provide our service.

Smartwatch partners with third parties to display advertising on our Websites and Services or to manage our advertising on other sites. Our third-party partners may use cookies or similar technologies to provide you advertising based on your browsing activities and interests.

Smartwatch collects some basic personal customer information in order to provide our services such as name, email, location and accounting information. For additional details please contact the data protection officer listed below.

#### 4. Web Site Navigational Information

##### Cookies, Web Beacons and IP Addresses

Smartwatch uses commonly-used information-gathering tools, such as cookies and Web beacons, to collect information as you navigate the Company's Websites ("Web Site Navigational Information"). As described more fully below, we and our partners use these cookies or similar technologies to analyze trends, administer Websites and Services, track users' movements around our Websites and Services, serve targeted advertisements and gather demographic information about our user base as a whole. This section describes the types of Web Site Navigational Information used on the Company's Websites and Services, and how this information may be used.

##### Cookies

Smartwatch uses cookies to make interactions with the Company's Websites easy and meaningful. When you visit one of the Company's Websites, Smartwatch's servers send a cookie to your computer or device. Standing alone, cookies do not personally identify you; they merely recognize your Web browser. Unless you choose to identify yourself to Smartwatch, either by responding to a promotional offer, opening an account, or filling out a Web form (such as a "Contact Me" or a "Free Trial" Web form) or have previously identified yourself to Smartwatch, you remain anonymous to the Company.

Smartwatch uses cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer or device when you close your browser software or turn off your computer. Persistent cookies remain on your computer or device after you close your browser or turn off your computer. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Websites or Services.

The following sets out how Smartwatch uses different categories of cookies and your options for managing cookies' settings:

Type of Cookies	Description	Managing Settings
Required cookies	Required cookies enable you to navigate the Company's Websites and use its features, such as accessing secure areas of the Websites and using Smartwatch Services.	Because required cookies are essential to operating the Company's Websites and the Services, there is no option to opt out of these cookies.
Functionality cookies	Functionality cookies allow the Company's Websites and	To manage the use of functionality cookies check

	<p>Services to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features. These cookies also enable you to optimize your use of Smartwatch’s Websites and Services after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise.</p>	<p>your browser settings. Note that opting out may impact the functionality you receive when using Smartwatch's Websites and Services.</p> <p>To learn more about how to control cookies using your browser settings click <a href="#">here</a>.</p> <p>To learn how to manage privacy and storage settings for Flash cookies check your browser settings.</p>
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## Log Files, IP Addresses, URLs and Other Data

As is true of most Websites, we gather certain information automatically to analyse trends in the aggregate and administer our Websites and Services. This information may include your Internet Protocol (IP) address (or the proxy server you use to access the World Wide Web), device and application identification numbers, your location, your browser type, your Internet service provider and/or mobile carrier, the pages and files you viewed, your searches, your operating system and system configuration information, and date/time stamps associated with your usage. Due to Internet communications standards, when you visit or use the Company’s Web sites and Services, we automatically receive the URL of the website from which you came and the website to which you go when you leave our Website. This information is used to analyze overall trends, to help us improve our Websites and Services, to track and aggregate non-personal information, and to provide the Websites and Services. For example, Smartwatch uses IP addresses to monitor the regions from which Customers and Visitors navigate the Company’s Websites. Smartwatch also collects IP addresses from Customers when they log into the Services as part of the Company’s “Identity Confirmation” and “IP Range Restrictions” security features.

## Social Media Features and Single Sign-on

The Company’s Websites may use social media features, such as the Facebook “like” button (“Social Media Features”). These features may collect your IP address and which page you are visiting on the Company’s Web site, and may set a cookie to enable the feature to function properly. You may be given the option by such Social Media Features to post information about your activities on the Company’s Web site to a profile page of yours that is provided by a third party social media network in order to share with others within your network. Social Media Features are either hosted by a third party or hosted directly on the Company’s Web site. Your interactions with these features are governed by the privacy policy of the company providing the relevant Social Media Features. Smartwatch also allows you to log in to certain of our Websites and Services using sign-in services such as Facebook Connect. These services will authenticate your identity and provide you with the

option to share certain personal information with us such as your name and email address to pre-populate our sign-up form.

## Do Not Track

Currently, various browsers — including Internet Explorer, Firefox, and Safari — offer a “do not track” or “DNT” option that relies on a technology known as a DNT header, which sends a signal to Websites’ visited by the user about the user’s browser DNT preference setting. Smartwatch does not currently commit to responding to browsers’ DNT signals with respect to the Company’s Websites, in part, because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators, including no consistent standard of interpreting user intent. Smartwatch takes privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

## 5. Public forums, refer a contact, and customer testimonials

Smartwatch may provide bulletin boards, blogs, or chat rooms on the Company’s Websites. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. Smartwatch is not responsible for the personal information you choose to submit in these forums.

Customers and Visitors may elect to use the Company’s referral program to inform contacts about the Company’s Websites and Services. When using the referral program, the Company requests the contact’s name and email address. Smartwatch will automatically send the contact a one-time email inviting him or her to visit the Company’s Websites. Smartwatch does not store this information.

Smartwatch posts a list of Customers and testimonials on the Company’s Websites that contain information such as Customer names and titles. Smartwatch obtains the consent of each Customer prior to posting any information on such a list or posting testimonials.

## 6. Sharing of information collected

### Service Providers

Smartwatch may share Data about Smartwatch Visitors, Customers and Attendees with the Company’s contracted service providers so that these service providers can provide services on our behalf. These service providers are authorized to use your personal information only as necessary to provide the requested services to us. Without limiting the foregoing, Smartwatch may also share Data about Smartwatch Visitors, Customers and Attendees with the Company’s service providers to ensure the quality of information provided, and with third-party social networking and media Websites, such as Facebook, for marketing and advertising on those Websites. Unless described in this Privacy Statement, Smartwatch does not share, sell, rent, or trade any information with third parties for their promotional purposes.

### Smartwatch Affiliates

The Company may share Data about Smartwatch Customers with other companies in order to work with them, including affiliates of the Smartwatch corporate group. For example, the Company may need to share Data about Smartwatch Customers with other companies within the Smartwatch corporate family for customer support, marketing, technical operations and account management purposes.

## Business Partners

From time to time, Smartwatch may partner with other companies to jointly offer products, services, or programs (such as webinars or downloadable content). If you purchase, specifically express interest in, or register for a jointly-offered product, service, or program from or through Smartwatch, the Company may share Data about Smartwatch Customers collected in connection with your purchase or expression of interest with our partner(s). Smartwatch does not control our business partners' use of the Data about Smartwatch Customers that we collect, and their use of the information will be in accordance with their own privacy policies. If you do not wish for your information to be shared in this manner, you may opt not to purchase or specifically express interest in a jointly-offered product or service.

Smartwatch does not share Data about Smartwatch Attendees with business partners unless: (1) you specifically opt-in to such sharing via an event registration form; or (2) you attend a Company event and allow Smartwatch or any of its business partners to scan your attendee badge. If you do not wish for your information to be shared in this manner, you may choose not to opt-in via event registration forms and elect not to have your badge scanned at Company events. If you choose to share your information with business partners in the manners described above, your information will be subject to the business partners' respective privacy statements.

## Billing

Smartwatch uses a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use Billing Information except for the sole purpose of credit card processing on the Company's behalf.

## Compelled Disclosure

Smartwatch reserves the right to use or disclose information provided if required by law or if the Company reasonably believes that use or disclosure is necessary to protect the Company's rights and/or to comply with a judicial proceeding, court order, or legal process.

## 7. International transfer of information collected

The Company primarily stores Data about Smartwatch Customers and Data about Smartwatch Attendees in the United Kingdom. To facilitate Smartwatch's global operations, the Company may transfer and access such information from around the world, including from other countries in which the Company has operations. This Privacy Statement shall apply even if Smartwatch transfers Data about Smartwatch Customers or Data about Smartwatch Attendees to other countries.

## 8. Communications preferences

Smartwatch offers Visitors, Customers, and Attendees who provide contact information a means to choose how the Company uses the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located at the bottom of the Company’s marketing emails. Additionally, you may unsubscribe by contacting us using the information in the “Contacting Us” section below.

## 9. Correcting and updating your information

Smartwatch may retain your information for a period of time consistent with the original purpose of collection. For instance, we may retain your information during the time in which you have an account to use our Websites or Services and for a reasonable period of time afterwards. We also may retain your information during the period of time needed for Smartwatch to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

You may request to review, correct, delete or otherwise modify any of the personal information that you have previously provided to us through the Company’s Websites and Services. If you have registered for an account with Smartwatch, you may generally update your user settings, profile, organization’s settings or event registration by contacting us. To update your billing information, discontinue your account, and/or request return or deletion of Your Data associated with your account, please contact us. For other requests to access, correct, modify or delete Your Data, please review the “Contacting Us” section below. Requests to access, change, or delete your information will be addressed within a reasonable timeframe.

## 10. Customer Data

Smartwatch’s Customers may electronically submit data or information to the Services for hosting and processing purposes (“Customer Data”). Smartwatch will not review, share, distribute, or reference any such Customer Data except when required by law. Smartwatch only access Customer Data only for the purpose of providing the Services or preventing or addressing service or technical problems or as may be required by law.

Smartwatch acknowledges that you have the right to access your personal information. If personal information pertaining to you as an individual has been submitted to us by a Smartwatch customer and you wish to exercise any rights you may have to access, correct, amend, or delete such data, please inquire with our customer directly. Because Smartwatch personnel have limited ability to access data our customers submit to our Services, if you wish to make your request directly to Smartwatch, please provide the name of the Smartwatch customer who submitted your data to our Services. We will refer your request to that customer and will support them as needed in responding to your request within a reasonable timeframe.

## 11. Security

Smartwatch uses appropriate technical and organisational security measures to protect Data about Smartwatch Customers.

## 12. Changes to this Privacy Statement

Smartwatch reserves the right to change this Privacy Statement.

## 14. Contacting us

Questions regarding this Privacy Statement or the information practices of the Company's Websites and Services should be directed to Smartwatch Privacy by filling out this form or by mailing us at:

Smartwatch Solutions Limited

[info@smartwatchesolutions.co.uk](mailto:info@smartwatchesolutions.co.uk)

SmartWatch Solutions LTD, Albion House, 86 Armley Road, Leeds, LS12 2EJ.

Signed:

Position: Managing Director



Name: Neil Jones

Date: 30/07/2025