

## Appendix – VisionTrack Data Processing Activities and Approved Sub-Processors List

### Direct Customer Online Terms and Conditions

Processing Activity	Purpose
<p><b>Description of the Data Processing/Subject Matter</b> This should describe what the personal data relates to e.g. customer purchasing history.</p>	<p>The VisionTrack in-vehicle CCTV solution although deployed upon vehicles which are used for business purposes only may from time to time capture data which may include Personal Data. Our system captures Footage and personal data including images of people, as well as vehicle registrations. It also captures Vehicle Data which does not include Personal Data. Both personal data and non-personal data is captured on devices that are encrypted and locked. All data is transmitted securely on a private APN with secure end-points, the data is decrypted by our cloud based (Microsoft-Azure) application which conforms with security standards based upon ISO27001.</p>
<p><b>Duration</b> The duration will usually be linked to the term/length of the contract. However, note that, in some situations, a Supplier might only Process Personal Data at a specific stage during the term of the contract.</p>	<p>For the duration of the contract and any period thereafter that VisionTrack determines, acting reasonably, that it needs to hold the data for in order to comply with its obligations under Data Protection Legislation. VisionTrack shall hold such data in line with its Data Retention Policy, updated from time to time.</p>
<p><b>Data Retention/Deletion Period and Process</b></p>	<p>For the period reasonably necessary for the Customer’s operational requirements.</p> <p>VisionTrack will delete all Personal Data with agreement from the Customer or at the Customer’s request, subject to Clause <b>Error! Reference source not found.</b> If no instructions are received from the Customer, all Customer’s Camera Data will be deleted 6 years after the termination/expiry of the last Live Subscription.</p>
<p><b>Nature and Purpose</b> The nature and purpose of the Processing should explain (a) what the Processing is e.g. collating Personal Data and organising into subsets and (b) why the Processing is taking place e.g. in order to analyse customer purchasing trends.</p>	<p>Video data along with vehicle speed, G shock and location from forward facing, near side and reversing cameras is captured. Data is used to review and assess liability in the event of potential or alleged incidents. Data is available in real time via live connection and is stored and can be access for up to 4 weeks.</p>
<p><b>Types of Personal Data</b> [e.g. data subject name, D.O.B.]</p>	<ul style="list-style-type: none"> <li>• General Information such as name, business address, business email, phone number</li> <li>• Vehicle Registration Number</li> <li>• Drivers of Vehicles. The level of information collected is determined by the Data Controller and the type of device installed but can include: <ul style="list-style-type: none"> <li>- Driver’s name,</li> <li>- Vehicle Registration Number</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>- Vehicle tracking information (GPS) recording the location of vehicle (live tracking and recording time and date), speed, incidents or accidents and mileage.</li> <li>- Driving history and driving behaviour</li> <li>- Photograph, video footage or</li> <li>- CCTV footage</li> <li>• Third parties including members of the public:</li> <li>• images of individuals</li> <li>• Third parties including members of the public:</li> <li>- images of individuals</li> </ul>
<b>Categories of Data Subject</b> e.g. customers, employees, members of the public)	<ul style="list-style-type: none"> <li>• Drivers who are authorised to drive the Vehicle equipped with the Products / Camera System device</li> <li>• Other employees</li> <li>• Fleet Managers</li> <li>• Users</li> <li>• Footage of members of the public</li> <li>• Footage of employees</li> </ul>
<b>Geographic regions in which the data may be Processed</b>	The United Kingdom
<b>Locations</b> in which the personal data may be Processed by VisionTrack)	Particularly 2 Chapman Way High Brooms Industrial Estate Tunbridge Wells TN2 3EF
<b>Locations</b> (including the geographic region) in which the Personal Data may be Processed by VisionTrack's Sub-Processors	Third party Authorised Installers will be under VisionTrack's direct control, monitored on site by its lead engineers. Commissioning and sign off will only be undertaken by direct employees of VisionTrack.

### Approved Sub-Processors

1.1 VisionTrack will only use the Sub-Processors listed in this table.

Processing Activity	Sub-Processors
Azure cloud platform	Microsoft UK
Mapping software	HERE Maps software
Authorised Nationwide Installers (if Installation option is included)	Hyde Park Avian Mobile Auto Windscreens Mobile Valley