

## **Introduction**

This policy ensures that data collected as a result of the use of the home device management services is processed fairly and lawfully by the authoritative personnel. Some of this data, for example that relating to user registration and accounting; contains “personal data” as defined by the European Union (EU) [1]. The collection and processing of personal data is subject to restrictions aimed at protecting the privacy of individuals.

## **Definitions**

### Personal Data

Any information relating to an identified or identifiable natural person [1].

### Processing (Processed)

Any operation or set of operations, including collection and storage, which is performed upon Personal Data [1].

### End User

An individual who by virtue of their domX platform registration is authorized to use the home device management services.

### Virtual Services

Services provided via a mobile or desktop web application.

## **Scope**

This policy covers Personal Data that are Processed as a prerequisite for, or as a result of an End User’s use of Tangible and Virtual services. Examples of such Personal Data include registration information, credential identifiers and device specific data, such as device manufacturer and model. This policy does not cover Personal Data relating to third parties included in datasets provided by the End User as part of the device installation process. Examples of such data are location information (e.g. user address) collected by the user, so that authorized company technicians can access the user premises and perform the required equipment installation.

## Policy

By their activity in the application, End Users:

1. Declare that they have read, understood and will abide by the Principles of Personal Data Processing as set out below.
2. Declare their acknowledgement that failure to abide by these Principles may result in exclusion from the home device management services, and that if such failure is thought to be the result of an unlawful act or results in unlawful information disclosure, they may be reported to the relevant legal authorities.

## Principles of Personal Data Processing

1. The End User whose Personal Data is being Processed shall be treated fairly and in an open and transparent manner.
2. Personal Data of End Users (hereinafter “Personal Data”) shall be Processed only for those administrative, operational, accounting and security purposes that are necessary for the safe and reliable operation of home device management services, without prejudice to the End Users’ rights under the relevant laws.
3. Processing of Personal Data shall be adequate, relevant and not excessive in relation to the purposes for which they are Processed.
4. Personal Data shall be accurate and, where necessary, kept up to date. Where Personal Data are found to be inaccurate or incomplete, having regard to the purposes for which they are Processed, they shall be rectified or purged.
5. Personal Data Processed for the purposes listed under paragraph 2 above shall not be kept for longer than the period defined in the relevant domX Regulation documents and by default shall be anonymised or purged after a period of 36 months.
6. Appropriate technical and operational measures shall be taken against unauthorised disclosure or Processing of Personal Data and against accidental loss or destruction of, or damage to, Personal Data. As a minimum, domX platform administrators shall:
  - a. Restrict access to stored Personal Data under their control to appropriate authorised individuals;
  - b. Transmit Personal Data by network or other means in a manner to prevent disclosure to unauthorised individuals;
  - c. Not disclose Personal Data unless in accordance with these Principles of Personal Data Processing;

- d. Respond to suspected breaches of this Policy promptly and effectively and take the appropriate action where a breach is found to have occurred;
  - e. Perform periodic audits of compliance to this Policy and make available the results of such audits to End Users upon their request.
7. Personal Data may only be transferred to or otherwise shared with individuals or organisations where the recipient presents an appropriately enforced legal request.

## References

[1] Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (DPD)

<http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:31995L0046>

# domX

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