

# **Privacy information for RIC Services**

#### 1. About this Privacy information

We at Securitas ("Securitas", "we" or "us"), affiliated companies worldwide ("Securitas Group"), are multinational global security firm focused on delivering protective and digital services for our clients. This Privacy information for RIC Services describes how we collect and process personal data when providing Risk Intelligence Center Services ("RIC") to our clients.

## 2. Data controller

Where we determine the purpose and means of processing personal data, Securitas will be a data controller. For the RIC security reports provided within Bronze, Silver and RIC Awareness services and for personal data collected not directly from the data subjects, the data controller is Securitas Security Services (UK) Ltd, London, United Kingdom.

For more information about the data controller and how to get in contact with us, please see the information the <u>Personal Data Controllers document</u> under the "United Kingdom".

You can also contact our global privacy team at: privacy@securitas.com

Where we act as a processor in our capacity of other RIC services to our clients, we will only process personal data in accordance with the instructions of our clients and act as a data processor.

## 3. How do we get information

The RIC Bronze and Silver services involve the collection of personal data pertaining to public figures from sources that are publicly accessible. This includes, but is not limited to, news publications, public announcements, and openly available social media content. The data collected typically encompasses identifiable information and activities or statements of public interest that may have implications for security. The processing of this data is driven by the legitimate interest of enhancing security awareness and preparedness among our clients. It enables the provision of insightful reports that detail relevant security events and trends.

In accordance with the GDPR's principle of data minimization, we limit the amount of such information collected as much as reasonably possible. We also anonymize or delete all copies of information processed before producing reports or otherwise sharing the results of our research and analysis with any third parties.

#### 4. Personal data processed, purpose and legal basis of processing

In order to provide RIC Bronze and Silver, limited personal data of public figures is processed in order to raise awareness about the security events and other general security matters in the form of security reports. This is based on the legitime interest of third parties to have a better security awareness (risk intelligence). The scope of the personal data processed has been assessed to balance the rights and freedoms of the data subjects whose personal data are processed (documented through our legitimate interest assessment).

The following information is processed about the public figures in a limited scope: identity data and other data which are made publicly available by those public figures or information existed in a wider in a security context and made publicly such as declaration of action which make have a security impact. Please refer to an example below: *Members of Argentina's social organizations protested against President Javier Milei's economic and social reform measures in Buenos Aires yesterday (17 Jan)*).



We retain personal information only for as long as is necessary to fulfil the purpose and no longer than we are permitted under the law. As for now, the RIC Bronze and Silver security reports are kept for ten years from creation. We set periodic terms to review the retention times.

## 5. Who do we share processed personal data with?

Each time we share personal data, we will ensure the personal data shared taking into consideration the nature of the data.

Service Providers and Subcontractors: personal data will be processed by our service providers or subcontractors (including data storage service providers, technical support, and maintenance of the service) on our instruction. All service providers and subcontractors act as personal data processors and are under contractual arrangements only allowed to process data for the purposes as set out above. Furthermore, the personal data processor (service provider or subcontractor) and those acting under instructions of the processor will not access more personal data than is required for the performance of the service covered by the agreement with Securitas.

Other third parties: We may also share Your personal data with other third parties who acts as separate data controllers (i.e. not instructed by us). For example, our security reports are available for our clients through subscription model.

## 6. Where we are processing personal data

To provide RIC Services, we process personal data primarily within EU/EAA. We enter into confidentiality and data processing terms with all our partners to ensure they comply with high levels of confidentiality, data protection laws, and best practices in privacy and security standards.

Nevertheless, certain services are carried out by subcontractors in third countries. To ensure that data is sufficiently safeguarded outside the EU/EEA, we have ensured that there are appropriate safeguards in place, including the European Commission's adequacy decisions, EU Standard Contractual Clauses (SCC) or Binding Corporate Rules (BCR) to ensure an essentially equivalent level of protection for personal data.

#### 7. How we protect personal data

Securitas takes appropriate technical and organizational measures to protect personal data. Securitas is constantly working to protect personal data from accidental or unlawful destruction, loss or alteration, unauthorized disclosure of, or unauthorized access to the personal data transferred, stored, or otherwise processed by Securitas.

### 8. Rights of data subjects

Individuals whose data is processed under the RIC Bronze and Silver services are entitled to certain rights under prevailing data protection laws. These rights include, but are not limited to, the right to access personal data, request rectification or deletion, impose restrictions on processing, and object to the processing of their data. To exercise these rights, individuals are encouraged to contact Securitas using the contact information provided above.

Please note that in case of the legitimate interest, we always carefully balance all circumstances to understand whether the legitimate interest being relied upon outweighs the individual's rights.

Details of the data subjects' rights are covered below:

- right to information about how personal data is used,
- right to access personal data,
- right to rectify personal data if inaccurate or incomplete,
- right to have personal data deleted in certain circumstances (i.e. the right to be forgotten),



- right to restrict processing of personal data in certain circumstances,
- right to object to processing of personal data in certain circumstances.

## 9. Changes to this Privacy information

We reserve the right to change this Privacy information.