Privacy Statement

This privacy statement replaces any older version. As and when our privacy statement is updated, we will publish it on our website. Last update 25-5-2018, version 3.2.

PFM Footfall Intelligence UK is a trading name of Counting Solutions Ltd and will hereafter be named as PFM UK. PFM UK is established at:

2 Perth House
Corbygate Business Park
Priors Haw Road
Corby, Northants, NN17 5JG
UK

PFM UK is responsible for the processing of data as shown in this privacy statement.

Contact details:
PFM UK
2 Perth House
Corbygate Business Park
Priors Haw Road
Corby, Northants, NN17 5JG
UK
+44 1536-267925
info.uk@pfm-intelligence.com.

PFM UK has appointed a Data Protection Officer who is also registered with the Dutch Data Protection Authority. If there are any questions you can send an email to: privacy@pfm-intelligence.com.

PFM UK has joined PrivacySIG. The PrivacySIG (Privacy Special Interest Group) is a non profit organisation consisting of companies which are developing or involved in the next generation of visitor analytics. It has developed a common "Code of Conduct" which is an agreement between all members to follow common rules to ensure and improve the privacy of individuals.

What does PFM UK do?
PFM UK Ltd. (hereinafter also: we / we, us / our) is a specialist in the field of footfall counting and behavioural analytics. Using our high-quality technology, we can collaborate with our clients to measure how busy it is somewhere, how many unique visitors they have and over what time period, how long they stay, how they behave and how often they return.

Our clients are mainly municipalities, retailers and property owners, who use the data we provide as a measurement of performance and a key KPI (Key Performance Indicator) for their businesses. The data can be used for calculating sales conversion rates, footfall capture rates, benchmarking, indexing, dwell times and footfall path analysis.

Why does PFM UK Ltd. have a Privacy Statement?
We value the careful handling of client and personal-, passers-by- and/or visitor data. In this statement we have detailed the processing of data in the context of our services. This privacy statement is aimed at anyone who encounters, or is measured by a PFM footfall system as well as anyone whose data we have access to. The relationship with our clients has been worked out in specific agreements made with them (processor agreement) which detail our services and how the data in each case will be handled.

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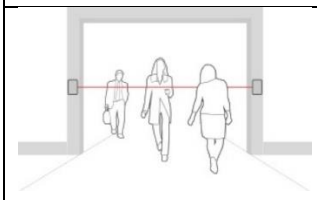
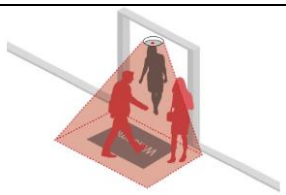
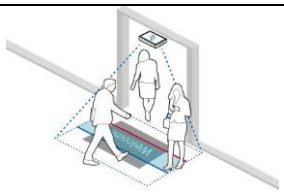
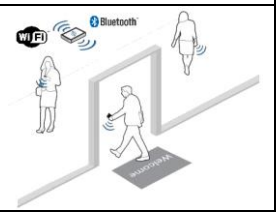
The techniques that PFM UK Ltd. uses.
Below we describe the most frequently used techniques with which we collect and then process footfall data.

Infrared beam counters	Thermal counters	3D Stereoscopic counters	Wi-Fi / BT counters
			

- Infrared beam counters

1st generation sensor which captures incoming and outgoing footfall through horizontal infrared beams. Data we process consists of sensor ID, date and time, number of in / out.

- Thermal counters

2nd generation sensor which counts incoming and outgoing footfall via a thermal imaging sensor. Data we process consists of sensor ID, date and time, number of in / out.

- 3D Stereoscopic counters

3rd generation sensor which counts incoming and outgoing footfall through optical sensors. Data we process consists of sensor ID, date and time, number of in / out. We do not process video images!

- Wi-Fi/ Bluetooth counters

This sensor registers all passers-by and / or visitors who have a device with them and have Wi-Fi and / or Bluetooth enabled (the device regularly sends probe requests). Data we process consists of sensor ID, date and time, MAC-address and signal strength.

N.B. Our measuring systems do not capture any other data. We hash the MAC-addresses irreversibly and are therefore pseudonymised. We remove the original MAC-address of your device from our sensors and systems. The further analysis of this data by us is done with the pseudonymised data. Our clients receive only aggregated analytical data and no personal data.

It should be noted that PFM UK Ltd. under no circumstances undertakes activities to identify any individual.

Personal data we process
PFM UK Ltd. processes your personal data because you use our services and/or because you provided it to us.

We process the following personal data:
- Organization name
- First and last name
- Address data
- Phone number
- E-mail address
- Bank account number of PFM employees, accounts payable and accounts receivable
- Other personal data that you actively provide, for example by creating a profile on one of our websites, in correspondence and by telephone
- Location data
- Information about your activities on our website
- Internet browser and device type
- Counts using infrared sensors or cameras
- Wi-Fi and / or Bluetooth MAC-addresses (if these functions are enabled on your device)

Special and / or sensitive personal data we process
Our website and / or services do not intend to collect data about website visitors who are younger than 16 years of age. Unless they have permission from parents or guardians. However, we cannot check if a visitor is older than 16. We encourage parents to be involved in the online activities of their children, to prevent data about children being collected without parental consent. If you are convinced that we have collected personal information about a minor without this permission, please contact us via privacy@pfm-intelligence.com, then we will delete this information.

For what purpose and based on which basic principle do we process personal data
PFM UK Ltd. processes your personal data for the following purposes:

- Handling your payment.
- Sending our newsletter and / or advertising brochure.
- To call or email you in case this is necessary to carry out our services.
- Inform you about changes to our services and products.
- Give you the opportunity to create an account.
- To deliver products and services.
- Your behaviour on the website to improve the website and to tailor the range of products and services to your preferences.
- If we are legally obliged to do this, such as information that we need for our tax return.
- To perform analyses based on the hashed / aggregated footfall data.
- To prepare reports for the benefit of our clients.

Any analysis we provide is reported to our clients exclusively on an aggregated basis. This means that the data in this analysis can no longer be traced back to personal data of a passer and/or visitor, nor to the data of a device that has captured footfall data. We do not provide personal data to our clients.

Automated decision-making
PFM UK Ltd. does not use automated decision-making processes on personal data that can have (significant) consequences for people. This applies to decisions being made by computer programmes or systems, without involving a person (for example an employee of PFM UK Ltd.).

How long do we store personal data
PFM UK Ltd. does not store your personal data longer than is strictly necessary to achieve the purposes for which your data is collected.

We use the following retention periods for (categories) of personal data:

Personal data	Storage period	Reason/ Lawful basis
Data on PFM-employees	After leaving employment: Staff file 2 years Payroll tax statements 5 years for payroll administration 7 years (fiscal storage period)	Legal obligation Contract
Applicants	4 weeks after the end of the application period or 3 weeks after rejection	Consent
Client data	No longer than is strictly necessary to achieve goals	Consent
Supplier data	No longer than is strictly necessary to achieve goals	Consent
Data on passers-by	No longer than is strictly necessary to achieve goals	Legitimate interest
Passers Wi-Fi and BT MAC-addresses	No longer than is strictly necessary to achieve goals	Legitimate interest

Sharing personal data with third parties

PFM UK Ltd. shares personal data with various third parties and / or partners if this is necessary for the execution of the agreement and to comply with any legal obligation. With companies that process your data, we sign a processor agreement to ensure the same level of security and confidentiality of your data. PFM UK Ltd. remains responsible for these processing operations. In addition, if PFM UK Ltd. provides your personal data to other third parties, we only do this with your express consent.

Cookies, or similar techniques we use
PFM UK uses functional, analytical and tracking cookies. The information that, for example by means of cookies, is collected by PFM UK can be used for the following purposes:

- For analytical purposes: to analyse the usage of the PFM UK website. Example: it is possible to keep track of how many visitors visit a specific web page, so that PFM UK knows which parts of its website are popular.
- For social media purposes: to be able to share information via social media.
- For promotional purposes: to be able to make relevant offers about services from PFM UK through personalised advertising or reminding you of services that you have viewed.
- For personalisation purposes: to provide visitors with information that is as relevant as possible.
- For functional purposes: to facilitate easy navigation on the PFM UK website or to remember your settings and / or preferences when using PFM UK.

On your first visit to our website, we have already informed you about these cookies and have asked permission to place them. You can opt out of cookies by setting your internet browser so that it no longer stores cookies. In addition, you can also delete all information that has previously been saved via your browser settings. See here for an explanation.

Cookies are also placed on our website by third parties. This concerns cookies from Google Analytics.

We have entered into a processing agreement with Google whereby;

- Google has masked the last octet of the IP address;
- PFM has switched on 'data sharing'; data is only shared after cookies are accepted for marketing;
- PFM does not use other Google services in combination with the Google Analytics cookies.

View, modify and delete data
You have the right to view, correct or delete your personal data. You also have the right to withdraw your consent to the data processing or to object to the processing of your personal data by PFM UK Ltd. and you have the right to data portability. This means that you can submit a request to us to send the personal data of your possession in a computer file to you or another organisation mentioned by you.

You can send a request for inspection, correction, deletion, data transfer of your personal data or request for cancellation of your consent or objection to the processing of your personal data to privacy@pfm-intelligence.com.

To ensure that the request for access has been made by you, we ask you to include your telephone number with the request. We will then call you at a suitable time and ask you a few check questions. We will respond as quickly as possible, but within four weeks, at your request.

PFM UK Ltd. also points out that you can file a complaint with the national supervisory authority, the Information Commissioner's Office. This can be done via the following link.

How we protect personal data
PFM UK Ltd. takes the protection of your data seriously and takes appropriate measures to prevent misuse, loss, unauthorised access, unwanted disclosure and unauthorised modification. If you have the impression that your data is not secure or there are indications of abuse, please contact us privacy@pfm-intelligence.com.

All communication, such as between our measuring systems and servers, the access of partners to the available analytics and the maintenance of systems, takes place via encrypted connections. In addition, we irreversibly hash the MAC-address of your device to another number.

Do you have questions or do you want to use the opt-out?
Do you have any further questions about the way we process your data? Please contact us via privacy@pfm-intelligence.com.

If you do not want us to collect your data, you can choose to turn off Bluetooth and Wi-Fi on your device when you visit one of our measurement areas. You can also use the opt-out option via PrivacySIG. This opt-out allows you to easily log off by entering your MAC address(es). Your MAC address can usually be found in the information screen about your device under the settings menu.

We only use the MAC address of your device that is necessary for this opt-out for your opt-out and we will keep this data in encrypted form. After you have used the opt-out, you can only be detected anonymously by our footfall counting sensors.