

# Data & Privacy Statement

Hoxton Analytics Limited  
Last Updated: 9<sup>th</sup> December 2020



## Introduction

This statement relates to personal information collected and/or processed by Hoxton Analytics Limited ('Hoxton').

Hoxton is committed to protecting your privacy. The purpose of this statement is to help you understand what personal information we collect and why, and what we do with it. We have prepared this statement with due regard to the data protection laws in the countries in which we collect and process personal information, including the EU General Data Protection Regulation (EU Regulation 2016/679). We build all of our technologies and products from the ground up to protect people's privacy and as such comply with the letter and spirit of the laws in the most stringent ways.

Hoxton provides products and services to our business customers ("Customers") to gather statistical data on how busy their locations are. At no point do we share or publish any personal data, and our systems are set up from the outset not to collect or store any personal data.

Customers use our people counting devices in order to assess the traffic and occupancy of their spaces, for example to understand the busiest hours of a retail store or to know if a building is getting overcrowded.

The camera system is designed to only collect anonymised data, and each device we sell has on-board anonymisation technologies such as face-blurring, to ensure this is the case.

When you visit our website or contact us using our online channels (such as through our social media accounts) we collect your personal information as a controller. For more information, please see the section of this statement below on Website Visitors.

When we anonymise your personal information because you have visited a Customer site, our Customer is the data controller and is responsible for ensuring that the anonymising cameras are situated in locations that the visitor would reasonably be expected to have a people counting device – for example at the entrance of a retailer or a visitor attraction.

The system is designed such that neither the Customer or Hoxton stores personal data, and the only processing that may take place is the anonymisation of personal data before any other party can have access to it.

## Hoxton Analytics Website Visitors

### **Personal information we collect**

#### **When you visit our website or contact us using our online channels**

When you contact us using the information on our website or through one of our social channels (including LinkedIn, Twitter and Facebook) we collect the information you provide to us. This typically includes your name, job title, employer business address, business email and any additional information you include in your message.

If you sign up to receive our latest product and company updates, we collect your email address.

When you visit our website, we may collect limited personal information automatically through the use of cookies and web beacons. For more details on cookies and web beacons, please refer to the section on cookies immediately below. We may also automatically collect information including the IP address of your organisation or ISP, your browser family, operating system family and version, your country and continent and your web page viewing path including page response times and download times. This information does not include personal information and is used only help us improve the performance of our website and to troubleshoot problems.

### **Cookies & social media links**

#### **When you visit our website**

Hoxton uses cookies and web beacons on our website and web beacons in some emails we send.

Cookies are small text files and web beacons are small graphic images. They are downloaded to your device when you visit a website or receive certain emails unless you have set your browser to stop them.

We use cookies to remember your preferences, display content that is more relevant to you and improve your overall experience on our site. We use web beacons to track the actions of individuals (such as email recipients) and measure the success of our marketing campaigns and response rates.

Our website includes social media sharing buttons and links to enable you to share our content through your preferred social media site from one of our web pages. These features may collect your IP address and the page you are visiting on our website and may set a cookie on your device.

When you use one of these buttons or links, you are sharing information to another website or service (such as LinkedIn, Twitter or Facebook) and this statement will no longer apply. Please read the privacy notices provided by the particular social media website you are sharing through before posting any personal information using these links.

## **How we use your personal information**

### **Collected when you visit our website or contact us using our online channels**

We use the personal information you provide to us to respond to your enquiry and, if you have agreed to us doing so, we use it to subscribe you to our product and company updates. You can unsubscribe from our updates and associated communications at any time by clicking on the 'opt out' links in emails or contacting us at [support@hoxton.ai](mailto:support@hoxton.ai)

### **Basis for using your personal information**

We use your personal information to communicate with you because it is in our legitimate interests to reply to enquiries made by individuals through our website, by email or through our social channels. Also, to send you our product and company updates where you have consented to us doing so.

You can object to or withdraw your consent for us to use your personal information in these ways. You can do so by unsubscribing to our product and company updates using the link provided in our emails or by contacting us.

### **How long we keep your personal information**

We will retain your personal information for as long as it necessary for the purpose of our relationship or until you object to us processing it or withdraw your consent.

It is possible that we may be required to share your personal information where mandated or permitted by law or with valid legal processes, such as in response to a court order or with government or law enforcement agencies; when we consider disclosure to be necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal purpose; and in the context of organisational restructuring.

### **International transfers of your personal information**

Hoxton Analytics is a UK organisation with operations in multiple countries. When you contact us using the information on our website or through one of our social channels your personal information is likely to be stored in or accessed from the UK and other countries.

## **Hoxton Analytics End User Processing**

### **Personal information we collect**

#### **When you visit a Customer**

When you visit a Customer, our cameras passively collect and anonymise images from the devices. There is no personal data in the output of this processing as it is designed explicitly to anonymise and remove all personal data.

We process the anonymised data to build an aggregated statistical dataset of people counts and occupancy statistics to help our Customers track venue performance and make decisions to improve the visitor experience or maintain safe occupancy levels.

The information we collect from your device does not include information we or the Customer can

use to identify you.

### Your Rights

You have legal rights in relation to your personal information.

#### **Hoxton Analytics as data controller**

If we have collected your personal information because you visited our website or contacted us through the site or our social media channels, then we will facilitate your rights directly because we are the controller of your personal information.

Where we are is the controller of your personal information, we extend the rights available to individuals in the EEA to all data subjects whose data we process irrespective of their location. These are as follows:

- You have the right of access to your personal information and can request copies of it from the controller and information about their processing of it.
- If the personal information the controller holds about you is incorrect or incomplete, you can ask it to rectify or add to it.
- If the controller is using your personal information with your consent, you can withdraw your consent at any time.
- Where the controller is using your data because it is in its legitimate interests to do so, you can object to it using it this way.
- Where the controller is using your personal information for direct marketing, including profiling for direct marketing purposes, you can object to it doing so.
- In some circumstances, you can restrict the controller from processing your data, request a machine-readable copy of your personal information to transfer to another service provider and compel the controller to erase your personal information.

You also have the right to lodge a complaint with a supervisory authority in an EU member state if you believe we are infringing EU data protection laws. You can lodge a complaint with the supervisory authority in your EU member state of residence, the member state in which you work or the member state in which the alleged infringement took place.

You can find the contact details for your national data protection authorities in the EU [at this link](#).

#### **Hoxton Analytics as data processor**

If we have anonymised your personal information on behalf of a Customer when you have visited them, your rights are facilitated by the Customer because they ultimately decided the purposes and means of the processing. Neither the Customer or Hoxton Analytics will however be holding personal data in relation to you, as this is deleted as part of the functionality of the system.

### Contacting Us

If you would like to contact us, including to ask a question or make a complaint, we may be reached at the details below:

Attention: Privacy Officer  
Hoxton Analytics Limited  
115 Mare Street  
Hackney  
London E8 4RU

### Updates to This Statement

We may update this data & privacy statement from time to time in response to changes in applicable laws and regulations, to our processing practices and to services we offer. When changes are made, we will update the 'Last Updated' date at the top of this document. Please review this statement periodically to check for updates.