

# Privacy Policy Statement



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## **1. What this policy covers**

Your privacy is important to us, and so is being transparent about how we collect, use and share information about you. This policy is intended to help you understand the following:

- What information we collect about you
- How we use the information we collect
- How we share the information we collect
- How we store and secure the information we collect
- How to access and control your information
- How we transfer the information we collect internationally
- Other important privacy information

This privacy policy covers the information we collect about you when you use our products or services, or otherwise interact with us, unless a different policy is displayed.

This policy also explains your rights about how the information we hold on you is used. Your rights include how you can object to certain uses of information about you and how you can request and update certain information about you. In summary:

The Company undertakes to keep any personal data it obtains in the performance of its obligations in accordance with relevant data protection legislation and not to use or disclose such information for any unlawful purpose. The Customer agrees that the Company may from time to time disclose personal data of the Customer and (if relevant) the Customer's employees, to its sub-contractors and service provider, if such disclosure is necessary in order to supply the Service.

The Company reserves the right to carry out a credit check against the Customer and may register information about the Customer and the Customer's account with credit reference agencies. The Company and other parties may use this information to make credit decisions. This information may also be used to prevent fraud and to trace debtors.

The Customer undertakes to provide the Company, promptly and free of charge, with all information and cooperation as the Company may reasonably require to enable it to proceed, lawfully and without interruption with the performance of its obligations under such an Agreement and under all relevant legislation.

IF YOU DO NOT AGREE WITH THIS POLICY, YOU HAVE THE RIGHT TO REQUEST THAT WE NO LONGER RETAIN ANY AND OR ALL OF THE PERSONAL INFORMATION WE HOLD ABOUT YOU. HOWEVER, THIS WILL ALMOST CERTAINLY INTERFERE WITH OUR ABILITY TO CONTINUE TO DELIVER SOLUTIONS.

## **2. Who this policy covers**

The group that this policy is intended to cover, collectively referred to as “You” through the rest of the policy, includes:

- Customers
- Prospective Customers
- Ex-Customers
- People who access our websites

We do not knowingly collect or process personal data relating to children or anyone under 18 years of age.

### **3. What information we collect on you**

#### **3.1 Overview**

We collect information about you when:

- You provide it to us.
- Automatically when you use our products and services.
- Data is provided to us by third parties.

The various categories of data we collect comprise:

- Data about your Identity including first name, last name, title, date of birth and gender;
- Data about your contact details including service address, correspondence/billing address, email address, landline telephone number and mobile phone number;
- Financial data including your bank account details for a direct debit and payment card details and your credit rating;
- Data relating to a transaction including details about payments to and from you and about the products and services that you have purchased from us;
- Technical data including IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other information on the devices you use to access our services;
- Data about your hosted services profile including username and password, preferences and settings;
- Data about your usage of our products and services including the amount of time you spend online, and when you make a call, the origin, destination and length of your call. Also events you trigger during the use of our Services, such as a call divert and Device and Connection Information
- Data relating to your marketing and communications choices including what method you would like to receive marketing (managed via our preference centre) and how frequently.

If you do not wish to supply the above information, then we will have difficulty setting up a customer account to provide our Solutions through, or providing ongoing support for our Solutions.

We may also collect and use non-personal data such as statistical or demographic data. This data may be derived from your personal data but is not considered personal data as this data cannot identify you.

#### **3.2 Information you provide to us**

We collect information about you when you provide it directly to us, and indirectly when we survey, install, program or modify Solutions in the process of satisfying a Sales Order or Maintenance Agreement.

##### **Account Information**

We collect information about you in the process of:

- Setting you up as a customer account
- Modifying your account

##### **Information you provide through our Services:**

Our Services include hosted unified communications services and features that require data to model the virtual networks we provide to you. Installation and configuration of premises-based solutions will also require this data. This information is necessary to correctly configure the service or solution.

#### **Information you provide through our support channels:**

Our Services also include our customer support, where you can submit information about a problem you experience with a product or service. When you engage with our support website and/or team you will be asked to provide contact information, a summary of the problem and any other documentation. If you do not have an existing service contract with us, we require at least one contact method.

#### **Information you provide outside our Services:**

Information you provide to us is not always done via our Services but via third-party services. This information also includes billing information to allow us to charge for services. All information provided in these transactions is handled in compliance with PCI-DSS regulations, and destroyed when no longer needed.

### **3.3 Information we collect automatically when you use the Services**

We collect information about you when you use our Services, for call billing, service management and analytics.

## **4. Information from third parties**

We receive information about you when you interact with certain Services that are administered through our third party partners and service suppliers. These include:

- Companies contracted by us to help us provide services to you;
- Other telecommunications operators when transferring services;
- Marketing organisations;
- Credit reference agencies or fraud prevention agencies.

The information we receive when you link our Services with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.

## **5. How we use the information we collect**

How we use the information we collect depends, in part, on the Services you use, how you use them and any preferences you have communicated to us. These uses include:

#### **To provide the Services**

We use the information about you to provide the Services to you, including:

- Process transactions
- Authenticate you when you log in
- Provide customer support
- Operate and maintain the Services

#### **To deliver billing information**

We also use your information to deliver billing and financial notifications, including:

- Invoices
- Telephone Bills
- Communications regarding changes in pricing

**For research and development:**

We are always looking for ways to improve our Services. We use collected information about how people use our Services, monitor, record, store and use any telephone, e-mail or other electronic communications and other feedback provided directly to us for the following:

- Troubleshoot any issues users are experiencing
- Identify any trends and activity patterns
- Identify areas which can be improved to help user experience
- Training and support

**To communicate with you about the Services:**

We use your contact information to send communications via phone, mail or email for the following:

- Confirming your purchases
- Responding to questions and requests
- Providing customer support
- Sending you technical notices and updates

These communications are part of the Services and, in most cases, you cannot opt out of them. If an opt out is available, you will find the option within the communication itself or in your account settings. We also provide tailored communications based on your activity and interactions with us.

**To market, promote and/or drive engagement with the Services:**

We use your contact information and information about how you use the Services to send you promotional communications that may be of specific interest to you by doing the following:

- Sending you an email
- Sending a letter with printed material.
- Telephone calls

These communications are aimed at driving engagement and maximizing what you get out of the Services, including:

- Information about new Services
- Newsletters
- Events we think may be of interest to you
- Software enhancements and updates

We also communicate with you about new product offers. You can control whether you receive these communications by email or other communication methods.

**Customer support:**

We use your information to:

- Resolve technical issues you encounter
- Respond to your requests for assistance

- To analyse bugs / crash information
- Improve our Services
- Software Fixes

**For safety and security:**

We use information about you and your Service use to:

- Verify accounts and activity
- Monitor suspicious or fraudulent activity
- Identify violations of Service policies
- Carry out credit checks

**To protect our legitimate business interests and legal rights:**

Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

**With your consent:**

We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

**5.1 Lawful basis for processing**

As a company that operates within the European Economic Area (EEA), we collect and process information about you only where we have a legal basis for doing so under applicable laws. The lawful basis depends on the Services you use and how you use them. This means we collect and use your information only where:

- We need it in order to provide you the Services, including to operate the Services, provide customer support and personalised features and to protect the safety and security of the Services.
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests.
- You give us consent to do so for a specific purpose.
- We need to process your data to comply with a legal obligation.
- If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place.

Where we are using your information because we have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

**6. How we share the information we collect**

As we sell a number of Services and solutions from third party suppliers, this means sharing information through the Services. We also provide the facility to buy Services and capital equipment through a fixed period lease. This requires us to share information with the lease provider.

We share information we collect about you in the ways discussed below. WE DO NOT SELL YOUR INFORMATION TO THIRD PARTIES.

## 6.1 Sharing with other Service users

When you use the Service, we share certain information about you with other Service users.

When making a call or communicating via a hosted Service, you expose your name, number and possibly presence information to the called party.

You or other Service users involved in the communication session may, via call recording or message history for email, chat or other text services, leave a record of their communication, listing personal details.

## 6.2 Sharing with third parties

We share information with third parties that help us operate, provide, improve, integrate, customise, support and market our Services.

### Service Provider:

We work with third-party service providers for the following:

- Hosted Services
- Lease Provision
- Maintenance
- Virtual Infrastructure
- Payment processing
- Analysis
- Email Communications
- Marketing Communications

If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

### Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:

In exceptional circumstances, we may share information about you with a third party if we believe that sharing is needed to:

- Comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements.
- Enforce our agreements, policies and terms of service.
- Protect the security or integrity of our products and services.
- Protect Digital Europe, our customers, or the public from harm or illegal activities.
- Respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

## 6.3 Sharing with affiliated companies

We share information we collect with affiliated companies. Affiliated companies are companies owned or operated by us. The protections of this privacy policy apply to the information we share in these circumstances. An example would be if you are utilising Services from more than one of the Digitel Group companies.

### Business Transfers:

We may share or transfer information we collect under this privacy policy in the event of any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. In this case we

will attempt to notify you (e.g. email and/or a prominent notice on the Services) if a transaction takes place, and outline any choices you may have regarding your information.

## **7. How we store and secure the information we collect**

### **7.1 Information storage and security**

We use in-house secure servers to host the information we collect, and we use technical measures to secure your data. Personal information is not kept on individual employees computers, and access to the secure servers from employee computers is via interfaces with built in access security and permission levels. Any information passed to third party providers is done so via secure communication links. Any data that we collect via our Services is transferred over an SSL protocol for security during transmission.

Although we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our system or otherwise in our care, is absolutely safe from intrusion by others.

Access to the data is limited to trusted employees. We ensure that they are committed to or under statutory obligation to maintain confidentiality, and process data only in relation to legitimate business purposes. In the unlikely event of a breach, our response procedure will be to minimise any damage, isolate the cause, and any employee found culpable will be subject to appropriate disciplinary action.

### **7.2 How long we keep information**

How long we keep information we collect depends on the type of information. Unless there is a specific regulatory or legal requirement for us to keep your information longer, we will keep your information for as long as it is necessary for the purpose for which it was collected.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

After such time, we will either delete or anonymise your information or, if this is not possible (for example, the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

## **8. How to access and control your information**

You have certain rights available to you when it comes to your information. Below is a summary of those rights, how to exercise them and any limitations.

### **8.1 Your rights**

Below is a list of your rights:

- Request a copy of your information.
- Ask us to update your personal data that we hold as a data controller.
- Object to our use of your information. (including for marketing purposes)
- Withdraw previously given consent.
- Request the deletion or restriction of your information.
- Request your information in a structured, electronic format.
- Right to complain to a relevant supervisory authority.

If you would like more information about these rights or how to apply them, please contact our Data Protection Officer.

Your request and rights may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information we are permitted to by law or have a compelling legitimate interest to keep. If you have unresolved concerns, you have the right to complain to a supervisory authority in the country where you live, where you work or where you feel your rights were infringed.

## **9. Other important privacy information**

### **9.1 Changes to our Privacy Policy**

We may change this privacy policy from time to time. We will post any privacy policy changes and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Services homepages, login screens, or by sending you an email notification.

We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Services and delete your account(s), as outlined above.

### **9.2 Contact Us**

Your information is controlled by Digitel Europe Ltd. If you have any questions or concerns about how your information is handled, please direct your inquiry to the Data Protection Officer (DPO), which we have appointed to be responsible for facilitating such inquiries.

Data Protection Officer,  
Digitel Europe Ltd  
Communications Centre  
1 Ivy Street  
Priory Industrial Estate  
Birkenhead  
CH41 5EE

**Telephone:** 0151 650 6352

**E-mail:** [dataprotection@digiteurope.co.uk](mailto:dataprotection@digiteurope.co.uk)



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