

**Teleproject UK Limited
Privacy Policy
May 2018_V1**

BACKGROUND:

Teleproject UK Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our Customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us.

Teleproject UK Limited.

Registered in England under company number 06951916.

Registered address:

1st Floor 2 Woodberry Grove, North Finchley, London. N12 0DR.

Main trading address:

Business & Technology Centre, Stevenage, Hertfordshire. SG1 2DX.

VAT number: 977 3536 72.

Data Protection Officer: Michael Jones / gdpr@teleproject-uk.com

We are a regulated telecommunications service provider regulated by Ofcom.

We are registered with the Information Commissioner's Office under registration reference: ZA196005.

We are Cyber Essentials Plus certified. Certificate No: CEP-MAS-59162.

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you all you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.

- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service provider or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way
- i) For more information about our use of your personal data see the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office (<https://ico.org.uk/>) or your local Citizens Advice Bureau.

5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us:

- Name.
- Address.
- Email address.
- Telephone number.
- Business name.
- Job title.
- Profession.
- Payment information.
- Voicemail messages.
- Call recordings. (with consent only)
- Call data records.

Your personal data as listed above may also be obtained from the following third parties:

- Authorised Dealers and Referrers of Sales Leads.
- Sales Consultants.
- Telecommunications suppliers.

6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for one of the following purposes:

- Providing and managing your account.
- Generating and sending out our billing invoices.
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails, text messages or calls from you.
- Supplying you with information by email and post that you have opted-in to (you may opt-out at any time by request to support@teleproject-uk.com).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone, text message and post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Data Ref.	Type of Data	Purpose of Data	Retention Period	Availability
Call Recording	Audio File	Recording turned on by the Controller with consent from caller.	12 months + 28 Days	12 months
Call Data Records	Text	Received from Network Operators to enable the processing of telephone bills/invoices using our licensed billing software.	36 months + 60 Days	36 months.
Customer Emails	Text	Communication with Customer.	Contract duration and 1 year after contract end.	As Per Retention Period.
Web Portal User	Text	Username for logging in to secure service management web portals.	Contract duration + 60 Days.	As Per Retention Period.
Web Portal Password	Encrypted Text	'Administrator' Password for logging in to secure service management web portals.	Contract duration + 60 Days.	N/A
Customer Banking Information	Text	Bank details obtained and used for payment by direct debit and refunds or rebates.	Contract duration + 60 Days.	N/A
Customer Contact Information	Text	Contact details are retained for communication between parties.	Contract duration and 6 years after contract end.	As Per Retention Period.
Customer Invoice Information	Text	Retained for accounting and legal purposes.	Contract duration and 6 years after contract end.	As Per Retention Period.
Voicemail	Audio File	Operation of day to day support services.	28 Days	As Per Retention Period.

8. **How and Where Do You Store or Transfer My Personal Data?**

We will normally only store your personal data within the UK and European Union. This means that it will be fully protected under the GDPR.

Please refer to our Data Protection policy for details of the special circumstances under which we may transfer your personal data to a country outside of the EEA.

The security of your personal data is essential to us, and to protect your data a number of important measures are in place, including the following:

- Security access on all doors throughout the Business & Technology Centre building. Additional security on Accounts Office door.
- No customer data is held electronically on site. All customer data is held in a secure data centre and accessed via remote desktops.
- Remote desktop access is locked down to specific IP addresses.
- PC's are locked when staff are away from their desks.
- We do not store company or customer data on laptops, tablets or smartphones with the exception of email on smartphones.
- Smartphones and tablets have fingerprint security and strong passwords. We use device management software to enable remote data wiping.
- We use a permission based structure for internal electronic file storage so that customer information is available to staff only on a need to know basis.
- Wherever possible we do not pass customer information internally by email, instead we save information to a secure folder on our server and advise colleagues of where the information can be viewed.
- We use file shredding software to securely delete documents held on our office server.
- At the end of the customer on-boarding process or when a project has been completed we use the shredding software mentioned above to securely delete documents that are not required for customer support moving forward.
- We print very little information and have shredding machines at all locations where printing of personally information may occur.
- Our billing software has permission based access and multiple areas where information is encrypted. This includes the encryption of bank account details.
- We use a PCI-DSS Level 1 compliant card payment system to ensure that we do not store, process or ever hear our customer's credit card details.

9. Do You Share My Personal Data?

Yes, Teleproject UK does not own its own telecommunications network or equipment. We contract with network operators and other service providers to assist us in delivering services to you under our branding. We do also use third parties for payment collection and payment processing, marketing services and courier/delivery services.

These supply partners will be involved in processing your personal data. It is our policy though to provide our supply partners with only the information that they need in order to fulfil their contract with us. The table below lists our supply partners that may require access to some or all of your personal data that we hold.

Service Types	Active Inbound, Hosted IVR, Text Message (SMS) & Telephone Card Payment Processing
Supply Partner	BCH Digital Limited. 111, Piccadilly, Manchester. M1 2HY
Data Held at	Servers located in Vodafone Watford Data Centre and Gamma Telecom Manchester Data Centre.
Service Types	Active iPBX, Fixed Line, SIP Trunk, Broadband & Mobile Services
Supply Partner	Daisy Wholesale. Hampshire House Hampshire Corporate Park, Templars Way, Chandler's Ford, Eastleigh. SO53 3RY.
Data Held at	TBC
Service Types	Active iPBX Lite, 3 CX & SIP Trunk Services
Supply Partner	PBX Hosting Limited. Unit 4, Bow Court, Fletchworth Gate Industrial Estate, Coventry CV5 6SP.
Data Held at	Servers located in Telehouse North & East Data Centres with back up to Reading Everest Data Centre.
Service Types	Mobile Phone Handsets
Supply Partner	GPSK Limited. 64-66 Werrington Business Centre, Papyrus Road. Peterborough, PE4 5BH.
Data Held at	TBC
Service Types	Routers, Cabling & Accessories
Supply Partner	Essanet Limited. Thornton Chase, Milton Keynes MK14 6FD.
Data Held at	TBC

Service Types	Mobile SIMs on EE Network
Supply Partner	IntraLAN Group Ltd. Epsom Business Park, Kiln Ln, Epsom KT17 1JF.
Data Held at	TBC
Service Types	Direct Debit Facility
Supply Partner	FastPay Limited. Agecroft Enterprise Park, Grosvenor House, Downcast Way, Pendlebury, Manchester M27 8UW.
Data Held at	Within the UK at secure site. Data backed up off site.
Service Types	Banking Services
Supply Partner	HSBC Bank PLC. Danestrete, Stevenage SG1 1BY.
Data Held at	TBC
Service Types	Billing Software
Supply Partner	Shaftesbury Systems Ltd. Chess House, Elstree Way, Borehamwood, Herts. WD6 1JD.
Data Held at	TBC

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

We contract with third parties (as described above), and those third parties may sometimes contract with third parties (as described above) that are located outside of the European Economic Area. If any personal data is transferred to a third party outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a subject access request (SAR).

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within fourteen days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Data Protection Officer):

Email address: gdpr@teleproject-uk.com.

Telephone number: 01438 771 888 (option 2).

Postal Address: Teleproject UK Ltd. Business & Technology Centre, Bessemer Drive, Stevenage, Hertfordshire. SG1 2DX

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available to download from our website www.teleproject-uk.com

13. **Implementation of Policy**

This Policy shall be deemed effective as of 25/05/2018. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by:

Name: Michael Jones
Position: Data Protection Officer
Date: 8th May 2018
Due for Review by: 8th May 2019

Signature:



Version Control			
Date	Version Number	Author	Comments
8th May 2018	1.0	Michael Jones	Initial version