

## Privacy Notice:

At Voip Unlimited, we are committed to ensuring that your privacy is protected. Should we ask you to provide certain information, by which you can be identified, then you can be assured that it will only be used in accordance with this Privacy Notice.

This Notice sets out how Voip Unlimited will use and protect any information that you give to us.

We may change our policy from time to time but will always update this Notice to reflect the latest situation. You should therefore check this page from time to time to ensure that you are happy with any changes.

This policy is effective from 7<sup>th</sup> January 2021.

## What personal information we collect:

When we refer to "personal information", we mean information that identifies you as an individual, or is capable of doing so.

We may hold and use information about you whether you're a customer, a channel partner, a 3<sup>rd</sup> party supplier, a job seeker, or when you interact with us in other ways (for example when you visit our website or portal).

The type of personal information we collect and/or generate will vary depending on the products and services you use, your relationship with us, and the methods you use to validate your identity.

Information we collect may include (but it isn't limited to):

- your name
- your personal and/or business contact details (including postal address, phone number(s), email address)
- your date of birth
- information required to validate your identity (including passport, driving licence, property details, HMRC correspondence, council tax or utility details)
- credit rating information
- payment information such as bank account, direct debit, debit or credit card details
- your cv, resumé, etc
- images including photographs, videos and CCTV, if you visit one of our buildings
- information about our products and services you use, or have used, including billing and payment history and other account information
- Information about how you use our products and services, such as:
  - devices you use to connect to our services (like your hardware, operating system version, IP addresses, traffic data, websites visited and high-level user behaviour)
  - phone records including the numbers you call and send messages to (and the phone numbers that you receive calls and messages from)
- your activity on our website and portal when you log in as a user
- your communications with us, including e-mails and call recordings
- information you give us when participating in surveys and competitions

## How we use your personal information:

How we use your personal information, and the legal basis for its processing, will vary according to the following scenarios:

### Information necessary for us to fulfil our contractual obligations:

- to provide service(s) to you, including checking your eligibility for the service(s), managing your account, applications and orders
- if you apply for a job
- to verify your identity or to perform any other authentication that we need
- to carry out credit risk analysis (which may include using information from 3<sup>rd</sup> party credit agencies)
- to provide effective security and technical support of our products and services, and help maintain service quality
- to let you know if we make changes to the products and services you use (this also means that we may monitor and/or record calls for authentication, security, quality and training purposes)
- for billing and payment purposes, and to collect debt
- to help us understand, manage, improve and develop the products and services we offer
- to comply with applicable laws and regulations
- to investigate any customer complaints
- for core business purposes such as operational management & analytics, corporate reporting (accounts and records), and staff administration

### Information used for marketing purposes:

- to market and advertise our products and services to you (including any product or service that you have shown interest in, or any promotional offers across our products and services)
- Send periodic newsletters in relation to updates about Voip Unlimited
- to undertake surveys, competitions and research
- to provide us with insights into new products and services our customers might like
- to publicise customer testimonials, and other recommendations we receive

### Information used for crime prevention purposes:

- to help prevent, detect and investigate crime (especially fraud and cybercrime).
- to trace nuisance or malicious calls, and track malware and cyber-attacks.
- to prevent and detect criminal attacks on our network, or against your equipment.
- to enable the prosecution of offenders.
- to protect national security.

## Who we share your personal information with:

We may need to share personal information with other parties in order to provide you with the product or service that you've requested (e.g. with our Channel Partners, Wholesalers, Technology Solution Providers and Installation companies). Where we do, these companies must follow our instructions and respect data privacy laws and regulations.

We may also share information about you with law enforcement agencies and other organisations, because we have a legitimate interest in protecting our network and business from attacks; and to prevent, detect and investigate crime.

We may also share information with other organisations (such as other communications providers and banks) who have the same legitimate interests. Doing this helps make sure our network functions properly and helps protect you from attacks.

We, and other organisations, may also access and use information recorded by fraud prevention agencies in various countries.

Please Note:

- In all cases, we only share your personal information in line with the UK Data Protection Act 2018, and other applicable laws.

## How long we keep your personal information:

How long we keep your information varies according to the information we collect, and what it's used for, but we only keep it as long as is necessary for the purposes for which it was collected.

Specifically, the first time you buy products or services from us, we will keep your identity validation and authentication information for 6 months.

Call recordings linked to your account are only retained for the duration of your contract, and are immediately deleted on the closure of your account. Any downloads of, or requests for, call recordings must be completed before the 'Services no longer required' date, as specified on your cancellation form.

Other contract-based information is only held for the duration of the contract – plus 6 months, to allow for effective closure of your account.

CVs, resumés etc are only held until a decision is made on your application – after which those from unsuccessful candidates are destroyed, and those from successful candidates are added to their personnel file.

In some cases, there are legal requirements to keep data for a longer minimum period than we would normally require (e.g. HMRC, Ofcom and/or Home Office purposes), in which case we'll keep it for that longer period.

## How we secure your personal information:

We are committed to ensuring that your information is secure. In order to prevent any unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial controls to safeguard and secure the information we collect.

We hold your data on our secure servers in Poole & London; and only process your data in the UK/EU; and do not transfer it to any other country, unless required for contractual fulfilment of international services or system development and support.

Where we capture debit or credit card information, we also use operational controls required by the Payment Card Industry Data Security Standards (PCI-DSS).

## **Our Cookie policy:**

Our use of personal information may involve using cookies and other similar technologies.

A cookie is a small text file which asks permission to be placed on your computer's hard drive. If you agree, the file is added, and the cookie helps analyse web traffic, or lets us know when you visit a particular page. Cookies allow web applications to respond to you as an individual. The web application can then tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. If you continue without making any changes, we assume that you're happy to receive cookies on the website.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs.

We use google analytics cookies, to review and track on-line campaigns, including customer service satisfaction.

Overall, cookies help us provide you with a better service, by enabling us to monitor which web pages you find useful, and which you do not. We only use this information for statistical analysis purposes and then the data is removed from the system.

A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer (see the Help menu of your browser for details on how to do this). However, this may prevent you from taking full advantage of the website.

To learn more, including how to control cookies, please visit this address: <http://www.allaboutcookies.org/>

## **Links to other websites:**

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website.

Therefore, we can't be responsible for the protection and privacy of any information which you provide whilst visiting such sites, and these sites are not governed by this privacy notice.

You should exercise caution and look at the relevant privacy notice relating to the website in question.

## Controlling your personal information:

Under Data Protection regulations, you have a number of rights in relation to your personal information (please visit the Information Commissioner's Office website for details, at this address: <https://ico.org.uk>).

We have set out below how we address and support those rights, and how you can exercise them.

### Right to be Informed:

You have the right to be informed about what information is collected, and how it is used. We do this using this Privacy Notice.

### Right of Access:

You have the right to request details of personal information which we hold about you.

If you would like a copy of some, or all, of this information, please write to:

Compliance Officer, Voip Unlimited, 6 Albany Business Park, Cabot Lane, Poole, Dorset, BH17 7BX  
(quoting: Subject Access Request)

### Right to Rectification:

You have the right to have inaccurate personal data rectified.

If you believe that any information we are holding on you is incorrect or incomplete, please write to us as soon as possible, at the above address (quoting: Data Rectification).

We will promptly correct any information found to be inaccurate.

### Right of Consent:

You have the right to control how we use your information, based on your choices and consent (e.g. you also have the right to object to direct marketing).

Here at Voip Unlimited we take your privacy seriously; and will manage your personal information responsibly to administer your account, and to provide you with the products & services you have requested from us.

We will not send you general marketing information, or other unrelated offers – but will only contact you with specific promotional offers relating to our products & services which may be of direct interest to you.

You can tell us how you would prefer to receive the information (or if you would rather not receive it), by completing a form on our website, or portal. This will confirm your identity, so that we can comply with your request(s).

#### Please Note:

- It is not possible to opt out of, or revoke your consent for, those items necessary for us to fulfil our contractual obligations, as this would mean we wouldn't be able to accept you as a customer.
- As a current customer, you will not be able to opt out of receiving essential service communications.

6 Albany Business Park, Cabot Lane, Poole, Dorset, United Kingdom BH17 7BX  
Reg No: 05225497                      VAT Reg No: 854 6528 96

### Right to Data Portability:

You have the right to have the information we hold about you passed to another organisation (e.g. if you change service supplier).

You can tell us which organisation you would like to transfer your data to, by completing a form on our website, or portal. This will confirm your identity, so that we can comply with your request.

### Right of Erasure:

You have the right to ask that we delete/destroy any information we hold about you.

You can tell us you would like this to happen, by completing a form on our website, or portal. This will confirm your identity, so that we can comply with your request.

#### Please Note:

- As a current customer, you are not able to request that we delete any items necessary for us to fulfil our contractual obligations.
- HMRC require us to keep invoice information for a period of 6 years + current financial year.
- Ofcom require us to keep call records for a period of 1 year.

### Right to Complain:

You have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority – please visit the ICO website for details, at this address: <https://ico.org.uk>.

### Contact Us:

Our Privacy Notice is based on the advice provided by the UK Information Commissioner's Office, which can be found at this address: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>, and the **Your Data Matters** campaign, details of which can be found at this address: <https://ico.org.uk/for-organisations/resources-and-support/your-data-matters>.

If you have any questions regarding our Privacy Notice, or any issues relating to Data Protection, please contact us as follows:

#### UK-based Customers:

Address: Compliance Officer, Voip Unlimited, 6 Albany Business Park, Cabot Lane, Poole, Dorset, BH17 7BX  
Email: [Compliance@voip-unlimited.net](mailto:Compliance@voip-unlimited.net)  
'phone: +44 1202 612000

#### EU-based Customers;

Address: Compliance Officer, Voip Unlimited, 26 Sunset Court, Cordina Street, Ghajnsielem GSM1024, Gozo, Malta  
Email: [Compliance@voip-unlimited.net](mailto:Compliance@voip-unlimited.net)  
'phone: +356 2778 0027