

SERVICE DATA PRIVACY POLICY

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Introduction

This document will be updated when necessary by distribution and public access via the company website. The policy will be reviewed following any significant changes to the services provided. In the absence of any major changes, the period between reviews will not exceed 12 calendar months.

GDPR

On 25th May 2018 all processing of personal data by organisations will have to comply with the General Data Protection Regulation.

'Processing data' under GDPR describes data that is stored, transmitted or processed and we use the same definition in this document.

Certain services provided by Firstcom require Firstcom to process personal data on behalf of the customer. We call this the "Service Related Personal Data". In relation to such processing Firstcom is the processor and the customer is the controller. Firstcom may appoint additional sub processors to carry out functions as required to fulfil the delivery of the contract.

Certain services arranged and billed by Firstcom do not require Firstcom to process personal data on behalf of the customer. However, a 3rd party may be engaged as part of the solution to fulfil the delivery of the contract and that 3rd party may become the data processor of the Customer's personal data. In such cases Firstcom will arrange for the 3rd party to provide to the Customer information pertaining to the data they process on behalf of the customer.

Service Related Personal Data protection policies

Firstcom has a comprehensive set of information security standards, policies and procedures. We have identified that the following subset may be relevant to the services we provide and the protection of Service Related Personal Data. Specifically:

Main Information Security policy

Software Development policy

Computer System Access Control policy

Third Party policy

Data Retention policy

All documents have been reviewed with the viewpoint of Firstcom as a processor of Service Related Personal Data and a staff training programme implemented to ensure compliance.

Service Related Personal Data and Firstcom products and services

The services under which we process Service Related Personal Data are listed below:

SIP Trunking - Unencrypted

Record Type	Details
Data Controller Representative Name and Contact Details	The customer name and operational / billing address.
Data Controller Data Protection Officer	Customer specific.
Data held and origin of data	Customer contact details related to emergency calls, Data Sharing occurs towards Emergency Services via carrier partners (Gamma, Colt, KCOM, TDC) for emergency call management.
	Billing name and email address, billing data and call records.
Type of processing	Transmission of voice calls over an IP network. Data is transient only. Transmission of data is controlled by a user of the customer who is participating in the call.
Purpose of Processing	Telephone call service for customers with IP-PBX telephone systems.
Retention period for categories of data	Billing information held for 5 years.
	Other customer information held for the duration of the customer agreement.
	Transmission data is transient only.
Overseas sharing outside EU	None **
Security of data processing	Emergency data sent via a secure portal in line with our information security policies.
	The public Internet may be used to transmit calls from the customer endpoint to the Firstcom servers. It may be possible for unencrypted calls to be intercepted and eavesdropped and sensitive information lost. Customers can upgrade to a secure encrypted solution available and recommended from Firstcom "SIP-Encrypt".
Legal Basis for processing	Firstcom's lawful basis for processing personal data is to fulfil our contractual obligations to our customers.

**** International communication**

In the case where a customer participates in an international call, Firstcom terminates the call within the EU. By nature of the service provided, customers must be reminded that personal data may be transmitted and as the data controller, must ensure adequate levels of protection for that data.

SIP Trunking- encrypted “SIP Encrypt”

Record Type	Details
Data Controller Representative Name and Contact Details	The customer name and operational / billing address.
Data Controller Data Protection Officer	Customer specific.
Data held and origin of data	Customer contact details related to emergency calls, Data Sharing occurs towards Emergency Services via carrier partners (Gamma, Colt, KCOM, TDC) for emergency call management.
	Billing name and email address, billing data and call records.
Type of processing	Transmission of voice calls over an IP network. Data is transient only. Transmission of data is controlled by a user of the customer who is participating in the call.
Purpose of Processing	Telephone call service for customers with IP-PBX telephone systems.
Retention period for categories of data	Billing information held for 5 years.
	Other customer information held for the duration of the customer agreement.
	Transmission data is transient only.
Overseas sharing outside EU	None **
Security of data processing	Emergency data sent via a secure portal in line with our information security policies.
	The public Internet may be used to transmit calls from the customer endpoint to the Firstcom servers. Call data is protected through strong encryption in line with our information security policies.
Legal Basis for processing	Firstcom's lawful basis for processing personal data is to fulfil our contractual obligations to our customers.

**** International communication**

In the case where a customer EU participates in an international call, Firstcom terminates the call within the EU. By nature of the service provided, customers must be reminded that personal data may be transmitted and as the data controller, must ensure adequate levels of protection for that data.

Universe cloud

Record Type	Details
Data Controller Representative Name and Contact Details	The customer name and operational / billing address.
Data Controller Data Protection Officer	Customer specific.
Data held and origin of data	Customer contact details related to emergency calls, Data Sharing occurs towards Emergency Services via carrier partners (Gamma, Colt, KCOM, TDC) for emergency call management.
	Billing name and email address, billing data and call records.
Type of processing	Transmission of voice calls over an IP network. Data is transient only. Transmission against a user of the customer who is participating in the call.
Purpose of Processing	Telephone call service with hosted PBX features.
Retention period for categories of data	Billing information held for 5 years.
	Other customer information held for the duration of the customer agreement.
	Transmission data is transient only.
Overseas sharing outside EU	None **
Security of data processing	Emergency data sent via a secure portal in line with our information security policies.
	The public Internet may be used to transmit calls from the customer endpoint to the Firstcom servers. It may be possible for unencrypted calls to be intercepted and eavesdropped and sensitive information lost. Customers can upgrade to a secure encrypted solution available and recommended from Firstcom "Secure Universe"
Legal Basis for processing	Firstcom's lawful basis for processing personal data is to fulfil our contractual obligations to our customers.

**** International communication**

In the case where a customer participates in an international call, Firstcom terminates the call within the EU. By nature of the service provided, customers must be reminded that personal data may be transmitted and as the data controller, must ensure adequate levels of protection for that data.

Secure Universe cloud

Record Type	Details
Data Controller Representative Name and Contact Details	The customer name and operational / billing address.
Data Controller Data Protection Officer	Customer specific.
Data held and origin of data	Customer contact details related to emergency calls, Data Sharing occurs towards Emergency Services via carrier partners (Gamma, Colt, KCOM, TDC) for emergency call management.
	Billing name and email address, billing data and call records.
Type of processing	Transmission of voice calls over an IP network. Data is transient only. Transmission against a user of the customer who is participating in the call.
Purpose of Processing	Telephone call service with hosted PBX features.
Retention period for categories of data	Billing information held for 5 years.
	Other customer information held for the duration of the customer agreement.
	Transmission data is transient only.
Overseas sharing outside EU	None **
Security of data processing	Emergency data sent via a secure portal in line with our information security policies.
	The public Internet may be used to transmit calls from the customer endpoint to the Firstcom servers. Call data is protected through strong encryption in line with our information security policies.
Legal Basis for processing	Firstcom's lawful basis for processing personal data is to fulfil our contractual obligations to our customers.

**** International communication**

In the case where a customer participates in an international call, Firstcom terminates the call within the EU. By nature of the service provided, customers must be reminded that personal data may be transmitted and as the data controller, must ensure adequate levels of protection for that data.

Universe call recording

Record Type	Details
Data Controller Representative Name and Contact Details	The customer name and operational / billing address.
Data Controller Data Protection Officer	Customer specific
Data held and origin of data	Call recordings made to/from users which will be made available to download to the user. The customer may appoint further nominated authorised employees to access the recordings.
Type of processing	Storing information in the form of voice calls, associated to a named user who has set up call recording. Company administrators will set authorisation permissions for the access of recordings.
Purpose of Processing	Provision of call recording features within Universe Cloud.
Retention period for categories of data	Data retention period set by the customer (Company Administrator)
Overseas sharing outside EU	None
Security of data processing	Call recordings stored in encrypted form and available to download via a secure portal in line with Firstcom's information security policies.
Legal Basis for processing	Firstcom's lawful basis for processing personal data is to fulfil our contractual obligations to our customers.

Universe Directory services

Record Type	Details
Data Controller Representative Name and Contact Details	The customer name and operational / billing address.
Data Controller Data Protection Officer	Customer specific
Data held and origin of data	Contact data set by users which is made accessible to telephone handset devices and associated applications.
Type of processing	Storing information in the form of contact data, associated to a named user who has set up a personal contact and that is available for their use only. Or storing information in the form of contact data for global company contacts (corporate).
Purpose of Processing	Provision of the corporate and personal directory to be accessed by user handsets and associated applications.
Retention period for categories of data	Data retention period is the duration of the customer agreement. Individual contact entries are processed by the customer user, or the customer system administrator.
Overseas sharing outside EU	None
Security of data processing	Contacts stored in encrypted form and available via secure network transports.
Legal Basis for processing	Firstcom's lawful basis for processing personal data is to fulfil our contractual obligations to our customers.

Pre-sales and Service Delivery

Record Type	Details
Data Controller Representative Name and Contact Details	The prospective customer name, or customer name and operational site address/billing address
Data Controller Data Protection Officer	Customer specific
Data held and origin of data	Any data may be transmitted to Firstcom by the customer in order for Firstcom to carry out pre-sales activities.
Type of processing	Personal Data could on rare occasions be required to create a service quotation or other design document.
Purpose of Processing	For tender creation and service quotation
Retention period for categories of data	Data retention period is for the duration of the validity period of the quotation. However, should personal data not be required after processing, then it will be securely destroyed at the end of the process.
Overseas sharing outside EU	None
Security of data processing	Information is processed on computing systems protected through Firstcom's Information Security policies.
Legal Basis for processing	Firstcom's lawful basis for processing personal data is to fulfil our contractual obligations to our customers.