



CONNECTING BUSINESS

123Telecom Limited Privacy Policy

How we use your personal information

At 123Telecom, we take your privacy very seriously.

We will use your personal information only to administer your account and to help us provide you with the products and services that you have requested from us.

For example, if you have asked us to provide a service from an underlying carrier such as Openreach, necessary elements of your data may be passed to our underlying carrier to facilitate the delivery or repair of the service.

What information do we hold about you?

At 123Telecom, we maintain information about clients and prospective clients to enable us to provide an efficient service and ensure that any marketing is sent to only those who might be interested in the services that we offer. We also hold details relating to suppliers and potential suppliers for the purpose of doing business.

Data held on customers and those who enquire about our services may include:

- Name, address, telephone, mobile, fax, e-mail address and website address;
- Details provided by you in course of your engagement with us
- Bank Account information in relation to the payment of your account by Direct Debit
- Email communications and Call Recordings
- Logs of telephone calls made/received using our Analogue, ISDN, SIP or Cloud phone services

Personal data held on applicants for job

We may hold a range of information about you. This includes:

- Your name, address and contact details, including email address and telephone number
- Details of your qualifications, skills, experience and employment history
- Information about your current level of remuneration, including benefit entitlements
- Whether or not you have a disability for which the Company needs to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK
- Any other information available in the public domain
- Any Data you supplied to us in connection with your application

123Telecom Information Officer

Our GDPR information officer is Jeremy White.

He can be reached by email using info-officer@123telecom.co.uk

The purposes for which we hold Call Recordings

We record telephone calls into our company for the purpose of training and monitoring purposes.

That is, in the event of any failure (or accusation of failure) relating to the product/service delivered, invoiced amount, configuration change requested or service termination request, we can double check that we performed correctly.

All inbound calls are Announced as being recorded. If you are not happy with being recorded, please hang up and email your query to team@123telecom.co.uk and explain that you have a problem with call recording.

Note that calls transferred to our Credit/Debit Card payments desk are NEVER recorded.

Call recordings are normally held for 5 years.

Specific call recordings can normally be deleted earlier than 5 years with the agreement of both parties. Please email team@123telecom.co.uk with the time/date/phone number and the reason for your request.

The recording of outbound calls to “prospects” from our sales team are NOT recorded.

All other outbound calls are recorded without announcement. All customers have confirmed their consent to this in their service contracts.

The purposes for which we hold Call Logs

We keep a log of telephone calls made for the purpose of billing and service use evidence.

In some instances, we also keep a log of telephone calls received for the purpose of billing and evidence. Inbound call logs may, or may not, include the callers number.

Call Logs are typically kept for 7 years for compliance.

Call logs are not currently passed to any other party, although 123Telecom reserve the right to use an external billing bureau in the future.

Our call logs originate from our underlying suppliers such as Openreach, who also have a legal obligation to hold the data for 7 years.

In exceptional circumstances, the courts can uphold a request from the Police to disclose call records for the purpose of crime investigation. Under these circumstances we have a legal duty to comply without notice to the party involved.

The purposes for which we intend to process personal data

We intend to process personal data for the following purposes:

- to enable us to supply/quote professional services to you as our client/potential client
- to enable us to employ you or consider you for future employment
- to fulfil our obligations under relevant laws in force if necessary
- to contact you about other services we provide which may be of legitimate interest or if you have consented to us doing so

The legal bases for our intended processing of personal data

Our intended processing of personal data has the following legal bases:

- at the time you instructed us to act or enquired about our company/services, you gave implicit consent to our processing your personal data for the purposes listed above
- the processing is necessary for the performance of any contract with you
- the processing is necessary for compliance with legal obligations to which we are subject

Where is your data stored?

We secure the personally identifiable information you provide on secure servers in the European Economic Area. We access this data in a controlled, secure environment. We have made best endeavours to ensure all data is protected from unauthorized access.

Payments by debit / credit card

Whilst you have the option to pay outstanding balance through your debit or credit card, we do not retain any of these card details on our computer systems. Instead, they are manually processed via a PCI compliant card machine adjacent to a telephone extension on our telephone system which NEVER records calls.

Marketing communications

In order to inform you of relevant industry updates, special offers or product announcements, we may occasionally send emails to our current customers and prospect business clients whose company uses services similar to those we supply, therefore meeting the GDPR "legitimate interest" category.

We never intentionally send email communications to private individuals/consumers.

We may also send you information on other services offered by us that may be of relevance to you, based on your previous engagement with us.

We may also send marketing communications to such individuals who have registered an interest in our services by 'opting-in' to receive specific marketing communications from us.

How to unsubscribe from 123Telecom marketing communications

We understand that some of our clients may not wish to receive aforesaid emails. Should you wish to unsubscribe from such communications, you can do so very easily through following methods:

- By clicking the “Unsubscribe” link located in the footer of each email we send
- Sending an “Unsubscribe Request” email to team@123telecom.co.uk
- Telephone our office on 0303 030 0123

By unsubscribing from such communications, you will no longer be kept informed about the new services we offer or any relevant changes in Laws and Regulation.

We will of course continue to email you with anything relevant to your current or past contract, such as “Invoices”, “Statements”, “Notices” and anything related to the performance of your service.

Disclosing your personal information to others

We never disclose/pass/sell your personal data to any other company/organisation except under the performance of our contract with you or for legal compliance.

We may share your personal data with:

- our Accountants
- our Solicitors, Debt Collection Agencies, The Crown, Judgement Enforcement Agencies
- our bankers, Direct Debit collection agency, our Credit Card service provider
- any third parties as necessary to deliver the services/products you have requested from us
- any Telecoms Industry complaints bodies: Ofcom/Federation of Communications Services/Ombudsman Services
- Our Professional advisor or service provider

If the law allows or requires us to do so, we may share your personal data with:

- HMRC
- the police and law/debt collection/enforcement agencies
- courts and tribunals
- the Information Commissioner’s Office (“ICO”).

In addition, 123Telecom may share data with trusted service suppliers to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to 123Telecom, and they are required to maintain the confidentiality of your information.

123Telecom does not sell, rent or lease its customer lists to third parties 123Telecom does not use or disclose sensitive personal information, such as race, religion, or political affiliations.

Website Analytics

Our website may use Google Analytics (or similar services) to help analyse how our visitors use our sites. These tools may use cookies to store information, such as what time the current visit occurred, whether the visitor has been to the site before, and what site referred the visitor to the web page. A different cookie is used for each website, and visitors are not tracked across multiple sites. The information generated by the cookie about your use of the website (including IP address) is transmitted to Google (or Similar provider). This information may then be used to evaluate visitors' use of the website and to compile statistical reports on website activity for 123Telecom Limited.

More information on how Google uses this data can be found [here](#). To disable this type of cookie, some browsers will indicate when a cookie is being sent and allow you to decline cookies on a case-by-case basis. In addition to declining cookies, you can often install the Google Analytics Opt-out Add-on in your browser, which prevents Google Analytics from collecting information about your website visits.

We will never (and will not allow any third party to) use the statistical analytics tool to track or to collect any Personally Identifiable Information (PII) of visitors to our site. Google will not associate your IP address with any other data held by Google. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user. We will not associate any data gathered from this site with any Personally Identifiable Information from any source, unless you explicitly submit that information via a fill-in form on our website.

123Telecom Cookies Policy

Cookies are only used by our website after consent from the website visitor.

Reviewing your Personal Data

The Data Protection Act 1998 (DPA 98) gives you the right to access the personal information about yourself that 123Telecom holds. You may request a written copy of the details held about you. This is called a data subject access request. Please write to us at 123Telecom Limited, 25 BSC Centre, Hood Road, Barry, Vale of Glamorgan, CF62 5QN. 123Telecom undertakes to respond to your query within 30 days.

Your data will be processed by our employees. You have the right to access, port, rectify, erase, restrict and object to the processing of your data. To contact our Data Protection Officers please email team@123telecom.co.uk

Deleting your records (the right to erasure)

In certain circumstances you have a right to have the personal data that we hold about you erased. Further information is available on the ICO website (www.ico.org.uk). If you would like your personal data to be erased, please inform us immediately and we will consider your request.

In certain circumstances we have the right to refuse to comply with a request for erasure. If applicable, we will supply you with the reasons for refusing your request.

The right to restrict processing and the right to object

In certain circumstances you have the right to 'block' or suppress the processing of personal data or to object to the processing of that information. Further information is available on the ICO website (www.ico.org.uk). Please inform us immediately if you want us to cease to process your information or you object to processing so that we can consider what action, if any, is appropriate.

Obtaining and reusing personal data (the right to data portability)

In certain circumstances you have the right to be provided with the personal data that we hold about you in a machine-readable format, e.g. so that the data can easily be provided to a new professional adviser.

Further information is available on the ICO website (www.ico.org.uk).

The right to data portability only applies:

- to personal data an individual has provided to a controller
- where the processing is based on the individual's consent or for the performance of a contract
- when processing is carried out by automated means

We will respond to any data portability requests made to us without undue delay and within one month. We may extend the period by a further two months where the request is complex or a number of requests are received but we will inform you within one month of the receipt of the request and explain why the extension is necessary.

Withdrawal of consent

Where you have consented to our processing of your personal data, you have the right to withdraw that consent at any time. Please inform us immediately if you wish to withdraw your consent.

Please note:

- the withdrawal of consent does not affect the lawfulness of earlier processing
- if you withdraw your consent, we may not be able to continue to provide services to you
- even if you withdraw your consent, it may remain lawful for us to process your data on another legal basis

(e.g. because we have a legal obligation to continue to process your data).

Changes to this statement

123Telecom will occasionally update this Statement of Privacy to reflect company and customer feedback. We would encourage you to periodically review this Statement to be informed of how 123Telecom is protecting your information.

Contact information

We welcome your comments regarding this Statement of Privacy. If you believe that we have not adhered to this Statement, please contact 123Telecom at team@123telecom.co.uk. We will use commercially reasonable efforts to promptly determine and remedy the problem.