

Voicevale Group Data Protection Policy

WHO WE ARE

Voicevale Group is committed to protecting the privacy and security of personal data.

Voicevale Group ("**Voicevale**") is a group of companies incorporated in the UK, France, Germany, Turkey and China. Voicevale London is the head office, whose registered address is Voicevale House, Spring Villa Park, Edgware, Middlesex, HA8 7EB, is responsible for any personal data collected when anyone avails of services from, purchasing the products of and selling products to the Voicevale Group.

Voicevale Group is a data controller and is therefore responsible for deciding how to hold and use personal data about you.

Our Data Protection Policy describes how we collect and use personal data about you in accordance with European Data Protection Law, hence our current policy applies to our offices in the UK, France and Germany.

Data Protection Law means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of people with regards to the processing of personal data and on the free movement of such data (referred to as "GDPR") and any applicable national legislation implementing the GDPR or otherwise related to the processing of personal data.

From 25 May 2018, the existing data protection law will be amended to include enhanced accountability and transparency obligations on us concerning your personal data.

It is important that you read this Data Protection Policy so that you are aware of how and why we are using your information.

DATA PROTECTON OFFICER

We have appointed data protection officers in each European group company to oversee compliance with this Data Protection Policy. If you have any questions about this Data Protection Policy or how we handle your personal information, please contact our Data Protection Officer at <u>hello@voicevale.com</u>,



THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data means any information about an individual from which that person can be identified.

When you or your company sells goods to or purchase goods from Voicevale, or if we avail of your services or you avail of our services, we may collect, store, and use the following categories of personal data about you:

- Identity Data details such as first name, last name, title and gender.
- **Contact Data** name, title, addresses, telephone numbers, and business and personal email addresses.
- **Financial Data** where you make payments to Voicevale, we will collect the IBAN, BIC and the name of your bank or other details where relevant.
- **Transaction Data** details about payments to and from you and other details of products and services you have purchased from us.
- Interaction and Usage Data when you interact with us we will record details of those interactions (for example, phone calls, e-mail correspondence). If you make a complaint we will process details concerning that complaint.
- **Mandatory Data** data that is mandatory for us to collect to comply with certain legal and regulatory obligations that apply to our business such as our health and safety obligations
- **CCTV Data** personal data on CCTV footage at our offices (if applicable) recorded for security and health and safety purposes.

HOW IS YOUR PERSONAL INFORMATION COLLECTED

We collect personal data through our direct interactions with you by post, phone, e-mail or otherwise, when you purchase our products or sell to us your products and when you complete our administrative forms in hard copy or on-line for our services and products.



HOW WE USE YOUR PERSONAL DATA

Voicevale Group takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. The purposes and reasons for processing your personal data are detailed below: -

(Please note this is not an exhaustive list)

- We collect your personal data in the performance of a contract
- We collect and store your personal data as part of our legal obligation for business accounting purposes
- We have a legal obligation to share your personal data with our credit reference agencies who provide us with financial background checks prior to registering you as a business partner
- We use your details in order to have the relevant business Contracts with you

IF YOU FAIL TO PROVIDE PERSONAL INFORMATION

If you fail to provide certain data when requested, we may not be able to enter into or perform our contract with you.

CHANGE OF PURPOSE

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so unless this is otherwise required or permitted by law (in which case we may process your personal data without your knowledge or consent).



DATA SHARING

We will share your personal data with third parties where required by law, where it is necessary to perform our contract with you or where we have another legitimate interest in doing so.

We will share your data with trusted third-party service providers. We may also share your personal data with other third parties, for example, in the context of a transfer of our statutory functions or with a regulator or to otherwise comply with the law.

We require third parties to respect the security of your data and to treat it in accordance with the law.

All our third-party service providers are required to take appropriate security measures to protect your personal data. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have also put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

TRANSFERRING INFORMATION OUTSIDE THE EU

We may transfer the personal data we collect about you outside the European Economic Area (EEA) where a trusted service provider is based outside of the EEA. We will always take steps to ensure that any transfer of your information outside of the EEA is carefully managed to protect your privacy rights.



DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Data Protection Officer in writing by e-mailing you request to <u>hello@voicevale.com</u>

COMPLAINTS

You have the right to make a complaint at any time to the Data Protection Commission. If you have any questions about this Data Protection Policy, please contact the Information Commissioner's office at <u>https://ico.org.uk</u> or the European Data Protection Supervisor (regulates EU institutions) <u>www.edps.europa.eu/edpsweb</u>

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