Gamma UK - Product Privacy Information & Data Sheets

Document Control

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Reference Documents:	[UK-RG-REC-005] - Gamma UK - Application Security - A Comprehensive Guide.

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Product Privacy Information

"Gamma" means the Gamma Entity providing the relevant service.

"Gamma Entity" means Gamma Telecom Limited, Gamma Network Solutions Limited or Gamma Business Communications Limited.

Certain services provided by Gamma require us to process[1] personal data:

- directly where Gamma is the controller.
- on behalf of a customer ("Product Related Personal Data"). In relation to such Processing Gamma is the processor and the customer is the controller.

Note: Gamma does not use Product Related Personal Data for automated decision taking (including profiling).

Contact Details

All Gamma Entities can be contacted at:

Kings House
Kings Road West
Newbury RG14 5BY Tel: 0333 014 0000
Email: DPO@gamma.co.uk

Legal basis of Processing

Gamma Process Data under the following Legal Basis:

- Legal obligations: process personal data to fulfil legal obligations.
- Legitimate interests: (i) process personal data to capture contact personal data of our customers in order to be able to manage the relationship with the business customer, or (ii) process personal data provided by the customer or partner for the purposes of processing that personal data in connection with or as part of the services provided the customer or partner.

Note: Processing personal data to ensure network and information security, including through a cloud-based data processor, is recognised as a "legitimate interest" and specifically called out as such in the EU General Data Protection Regulation (see Recital 49 in GDPR[2])

[1] Gamma adopt the broad definition of "processing" that appears at Article 4(2) of the GDPR: "'processing' means any operation or set of operations which is performed on personal data or on sets of personal data" which includes, but is not limited to the following non-exhaustive series of examples: "collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction."

[2] 49) The processing of personal data to the extent strictly necessary and proportionate for the purposes of ensuring network and information security, i.e. the ability of a network or an information system to resist, at a given level of confidence, accidental events or unlawful or malicious actions that compromise the availability, authenticity, integrity and confidentiality of stored or transmitted personal data, and the security of the related services offered by, or accessible via, those networks and systems, by public authorities, by computer emergency response teams (CERTs), computer security incident response teams (CSIRTs), by providers of electronic communications networks and services and by providers of security technologies and services, constitutes a legitimate interest of the data controller concerned. This could, for example, include preventing unauthorized access to electronic communications networks and malicious code distribution and stopping 'denial of service' attacks and damage to computer and electronic communication systems.

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Individual Rights

- **Access to Personal Data** is available to customers and partners on the product portals available while the product is active. Access can also be requested by contacting Gamma.
- **Rectification and Erasure of Personal Data** is available to customers and partners on the Gamma portals, while the product is active. This is limited to administrator profiles for editing and removing user profiles from the Customer Account.
- **Restriction of, or Objection to, Processing of Personal Data:** Data Subjects requesting Restriction of, or Objection to, processing of Personal Data may be required to provide identification to confirm the validity of the request. Where the processing of personal data is necessary for Gamma to comply with regulatory or legal obligations as an independent controller, Gamma will confirm to the data subject in writing if a request cannot be completed.
- **Right to Data Portability** can be requested using any of the contact methods listed above.

Customers and partners can contact: their Gamma Account Manager; any Gamma support team; website contact function; or publicly available telephone numbers as listed on gamma.co.uk; or through the details listed above.

Data Subjects not connected to a customer or partner, can contact Gamma by writing to Gamma Head Office Address, emailing DPO@Gamma.co.uk or contacting Gamma via any of the publicly available telephone numbers as listed on www.gammagroup.co.

Security

Gamma is ISO27001, ISO22301, Cyber Essentials Plus (corporate network) certified.

For further information on Gamma security measures read - Gamma UK - Application Security - A Comprehensive Guide which is available upon request.

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Product Privacy Data Sheets

The services under which Gamma processes Product Related Personal Data and the details of such processing are:

UcaaS	Horizon Hosted Phone System Horizon Call Recording Horizon Contact Centre Phoneline+ SmartAgent
SIP and Call Management	SIP Trunking and Call Management Inbound Call Routing Omni-Channel
United Communications	MS Teams CloudUCX MS Teams Operator Connect MS Teams Direct Routing
Business Phone Systems	Horizon Collaborate Horizon for MS Teams Horizon Integrator CRM Horizon Soft Client Horizon Call Queuing Horizon Receptionist Console Horizon Contact Centre Circleloop Advanced Call Analytics
Connectivity	Broadband Assured Broadband Ethernet Broadband Gamma SoGEA Business Only Mobile
Advanced Network Services	Advanced Network Services

For the purposes of the tables below any reference to:

- “Reseller” or “Channel Partner” shall mean a company that purchases services from Gamma for the purpose of reselling them to its end customers;
- “Customer” shall mean a customer of the Reseller or a direct customer of Gamma and as a Data Subject shall mean employees, workers or contractors of the Customer; and
- “Contact” shall mean the person the “Customer” has contact with.

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Product Privacy Data Sheet – Horizon Hosted Phone System

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<table>
<tr><th>Description</th><th>Details</th></tr>
<tr><td>The purpose of the processing</td><td>Gamma will process the below data types in relation to the legitimate interest of providing a service which involves the processing of personal data for the benefit of the customer and to comply with legal obligations.</td></tr>
<tr><td>Duration of the processing</td><td>Duration of the service</td></tr>
<tr><td>Categories of Data Subject and Data Types</td><td>
<table>
<tr><th>Data Types
(May be classed as Personal Data in bold)</th><th>Channel Partner/ Reseller</th><th>Customer</th><th>Contact</th></tr>
<tr><td>Name (Title, First Name and/or Surname)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Company Name</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Company Address</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Contact details (telephone/DDI/Mobile)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Email address (domain @xxx)</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Email address (company)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>CDR data[3]</td><td>✓</td><td></td><td></td></tr>
<tr><td>Call Statistics[3]</td><td></td><td>✓</td><td></td></tr>
<tr><td>Username</td><td>✓</td><td></td><td>✓</td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>CDR Data – is kept for 42 days.
Transit data – up to 24 hours.
All other data – for the duration of the product.</td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside theUK</td><td>None</td></tr>
</table>

[3] If provided with identifiable data.

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Product Privacy Data Sheet - Horizon Call Recording

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<table>
<tr><th>Description</th><th>Details</th></tr>
<tr><td>The purpose of the processing</td><td>Gamma will process the below data types in relation to the legitimate interest of providing a service which involves the processing of personal data for the benefit of the customer and to comply with legal obligations.</td></tr>
<tr><td>Duration of the processing</td><td>Duration of the Service</td></tr>
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<tr><th>Data Types
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<tr><td>Name (Title, First Name and/or Surname)</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Contact details (telephone/DDI/Mobile)</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>CDR data[3]</td><td></td><td>✓</td><td></td></tr>
<tr><td>Call recordings</td><td></td><td>✓</td><td>✓</td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>Call recording duration - Customer dictated - 3, 6 or 12 months.
Call recording retrieval - 7-day retrieval of call recordings at the end of the retention period</td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet - Horizon Contact Centre

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<table>
<tr><th>Description</th><th>Details</th></tr>
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<tr><td>Name (Title, First Name and/or Surname)</td><td></td><td></td><td></td></tr>
<tr><td>Company Address</td><td></td><td></td><td>✓</td></tr>
<tr><td>Contact details (telephone/DDI/Mobile)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Email address (company)</td><td></td><td>✓</td><td></td></tr>
<tr><td>CDR data[3]</td><td>✓</td><td></td><td></td></tr>
<tr><td>Call Statistics[3]</td><td>✓</td><td></td><td></td></tr>
<tr><td>Call recordings</td><td></td><td>✓</td><td></td></tr>
<tr><td>Social Media URL</td><td></td><td></td><td>✓</td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>User data is deleted when user is removed from Horizon Contact Centre.
Also see retention for - Horizon Hosted Phone System</td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet - Phoneline+

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<table>
<tr><th>Description</th><th>Details</th></tr>
<tr><td>The purpose of the processing</td><td>Gamma will process the below data types in relation to the legitimate interest of providing a service which involves the processing of personal data for the benefit of the customer and to comply with legal obligations.</td></tr>
<tr><td>Duration of the processing</td><td>Duration of the service</td></tr>
<tr><td>Categories of Data Subject and Data Types</td><td>
<table>
<tr><th>Data Types
(May be classed as Personal Data in bold)</th><th>Channel Partner/ Reseller</th><th>Customer</th><th>Contact</th></tr>
<tr><td>Name (Title, First Name and/or Surname)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Company Name</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Company Address</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Contact details (telephone/DDI/Mobile)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Email address (domain @xxx)</td><td>✓</td><td></td><td></td></tr>
<tr><td>Email address (company)</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Voicemail DDI</td><td></td><td>✓</td><td></td></tr>
<tr><td>CDR data[3]</td><td>✓</td><td></td><td></td></tr>
<tr><td>Call Statistics</td><td></td><td>✓</td><td></td></tr>
<tr><td>Username</td><td>✓</td><td></td><td></td></tr>
<tr><td>Password</td><td>✓</td><td></td><td></td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>Until Endpoint is ceased
(Company data is retained for up to 30 days after deletion of account)</td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet - SIP Trunking and Call Management

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<table>
<tr><th>Description</th><th>Details</th></tr>
<tr><td>The purpose of the processing</td><td>Gamma will process the below data types in relation to the legitimate interest of providing a service which involves the processing of personal data for the benefit of the customer and to comply with legal obligations.</td></tr>
<tr><td>Duration of the processing</td><td>Duration of the Service</td></tr>
<tr><td>Categories of Data Subject and Data Types</td><td>
<table>
<tr><th>Data Types
(May be classed as Personal Data in bold)</th><th>Channel Partner/ Reseller</th><th>Customer</th><th>Contact</th></tr>
<tr><td>Name (Title, First Name and/or Surname)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Company Name</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Company Address</td><td></td><td>✓</td><td></td></tr>
<tr><td>Contact details (telephone/DDI/Mobile)</td><td></td><td></td><td>✓</td></tr>
<tr><td>Email address (company)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Email address (personal)</td><td>✓</td><td></td><td></td></tr>
<tr><td>Username</td><td>✓</td><td></td><td></td></tr>
<tr><td>Password</td><td>✓</td><td></td><td></td></tr>
<tr><td>Job Title</td><td>✓</td><td></td><td></td></tr>
<tr><td>IP Address</td><td></td><td>✓</td><td></td></tr>
<tr><td>ID (Company, social media, service)</td><td>✓</td><td></td><td></td></tr>
<tr><td>SIP address</td><td>✓</td><td>✓</td><td></td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>Data is retained until the endpoint is ceased

Authentication - 6 months at capture
Portal user authorisation & permissions - indefinite at capture
Audits provisioning requests - indefinite at capture
Number Mgt business logic - indefinite at capture
CSCF business logic - indefinite at capture
Inbound company and number details - indefinite at capture
Numbers and IP - 90 days at capture
SWE backups - 50 days at capture</td></tr>
<tr><td>Sub-processors</td><td>UK Emergency Services Central Handling Agency, BT plc</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet - Inbound Call Routing

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<table>
<tr><th>Description</th><th>Details</th></tr>
<tr><td>The purpose of the processing</td><td>Gamma will process the below data types in relation to the legitimate interest of providing a service which involves the processing of personal data for the benefit of the customer and to comply with legal obligations.</td></tr>
<tr><td>Duration of the processing</td><td>Duration of the Service</td></tr>
<tr><td>Categories of Data Subject and Data Types</td><td>
<table>
<tr><th>Data Types
(May be classed as Personal Data in bold)</th><th>Channel Partner/ Reseller</th><th>Customer</th><th>Contact</th></tr>
<tr><td>Name (Title, First Name and/or Surname)</td><td></td><td>✓</td><td></td></tr>
<tr><td>Company Name</td><td></td><td>✓</td><td></td></tr>
<tr><td>Email address (company)</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>CDR data[3]</td><td></td><td>✓</td><td></td></tr>
<tr><td>Call Statistics</td><td></td><td>✓</td><td></td></tr>
<tr><td>Call recordings</td><td></td><td>✓</td><td></td></tr>
<tr><td>Username</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Password</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>IP Address</td><td></td><td>✓</td><td></td></tr>
<tr><td>ID (Company, social media, service)</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Company identifiers (Product specific, account numbers etc)</td><td>✓</td><td>✓</td><td></td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>User information retained until user deleted/endpoint ceased.

The Inbound system is able to record and store calls or parts of calls in audio (MP3) files. These files can be recorded calls or part of a call or voicemail messages. Retention period for these files is 6 or 12 months, chosen by the customer, or manual deletion by the customer.
The files are stored in the Gamma NFS Cluster and the users can listen or download them through the GUI and they can also remove them from the system. The play and download mechanism works through separate scripts and are controlled by user authentication and access control management.
These files can hold sensitive information, since we cannot control what the caller/called party say in a call or in a voicemail message (eg. Bank Account Number, Card Number, ID Number, political opinion, etc.). There are also two mechanisms, which can affect the retention of these files. The automatic clean-up scripts remove the files when the user deletes them or when the retention period (e.g. 6 months/12 months) triggers it. In this case the file is still present on the NFS server for 7 days before it is purged.
The other mechanism is the Backup Snapshot system of the NFS Cluster. This system holds the deleted files for an additional 10 days.</td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet – Omni-Channel

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<table>
<tr><th>Description</th><th>Details</th></tr>
<tr><td>The purpose of the processing</td><td>Gamma will process the below data types in relation to the legitimate interest of providing a service which involves the processing of personal data for the benefit of the customer and to comply with legal obligations.</td></tr>
<tr><td>Duration of the processing</td><td>Duration of the Service</td></tr>
<tr><td>Categories of Data Subject and Data Types</td><td>
<table>
<tr><th>Data Types
(May be classed as Personal Data in bold)</th><th>Channel Partner/ Reseller</th><th>Customer</th><th>Contact</th></tr>
<tr><td>Name (Title, First Name and/or Surname)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Company Name</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Company Address</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Contact details (telephone/DDI/Mobile)</td><td>✓</td><td></td><td>✓</td></tr>
<tr><td>Email address (company)</td><td></td><td>✓</td><td></td></tr>
<tr><td>CDR data[3]</td><td>✓</td><td></td><td></td></tr>
<tr><td>Call Statistics</td><td></td><td>✓</td><td></td></tr>
<tr><td>Call recordings</td><td></td><td>✓</td><td></td></tr>
<tr><td>Job Title</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>IP Address</td><td></td><td></td><td>✓</td></tr>
<tr><td>Age and/or Date of Birth</td><td></td><td></td><td>✓</td></tr>
<tr><td>Gender</td><td></td><td></td><td>✓</td></tr>
<tr><td>Data Subjects Image</td><td></td><td></td><td>✓</td></tr>
<tr><td>ID (Company, social media, service)</td><td></td><td></td><td>✓</td></tr>
<tr><td>Data variables (open text information)</td><td></td><td></td><td>✓</td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>Data is deleted at the end of processing.
Call recordings – 7 days
(Cirrus) Call Logs – Calling Line Identification (CLI): 7 years; detailed call log information: 65 days
(Cirrus) Collected Data Variables – as selected by the customer (end of call, 65 days, more than 65 days) Data subjects' information – as defined by the customer</td></tr>
<tr><td>Sub-processors</td><td>Cirrus Response Ltd</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet - MS Teams CloudUCX

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<table>
<tr><th>Description</th><th>Details</th></tr>
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<tr><td>Duration of the processing</td><td>Duration of the service</td></tr>
<tr><td>Categories of Data Subject and Data Types</td><td>
<table>
<tr><th>Data Types
(May be classed as Personal Data in bold)</th><th>Customer</th><th>End User</th></tr>
<tr><td>Name (Title, First Name and/or Surname)</td><td></td><td>✓</td></tr>
<tr><td>Company Name</td><td>✓</td><td>✓</td></tr>
<tr><td>Company Address</td><td></td><td>✓</td></tr>
<tr><td>Contact details (telephone/DDI/Mobile)</td><td></td><td>✓</td></tr>
<tr><td>Email address (company)</td><td>✓</td><td>✓</td></tr>
<tr><td>Call Statistics</td><td>✓</td><td>✓</td></tr>
<tr><td>Job Title</td><td>✓</td><td>✓</td></tr>
<tr><td>MSTeams</td><td></td><td>✓</td></tr>
<tr><td>SIP address</td><td></td><td>✓</td></tr>
<tr><td>Data variables (open text information)</td><td>✓</td><td></td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>Gamma portal SIP Database - unlimited from 'at capture'
CDR Data - up to one year from 'at capture' CloudUCX Database (AWS) - lifetime of the contract from 'at capture'</td></tr>
<tr><td>Sub-processors</td><td>AWS</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet – MS Teams Operator Connect

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<tr><td>Company Name</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Company Address</td><td></td><td>✓</td><td></td></tr>
<tr><td>Contact details (telephone/DDI/Mobile)</td><td></td><td>✓</td><td></td></tr>
<tr><td>Email address (company)</td><td>✓</td><td></td><td></td></tr>
<tr><td>Job Title</td><td></td><td>✓</td><td></td></tr>
<tr><td>MSTeams</td><td></td><td>✓</td><td></td></tr>
<tr><td>ID (Company, social media, service)</td><td>✓</td><td></td><td></td></tr>
<tr><td>SIP address</td><td></td><td>✓</td><td></td></tr>
<tr><td>Data variables (open text information)</td><td>✓</td><td>✓</td><td></td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>Gamma Voice WebApp Database - Unlimited from 'at capture'
Gamma Voice WebApp Logs - 6 months from 'at capture'
Gamma Portal SIP Database - unlimited from 'at capture'
Product Lifetime as per SIP order contractual terms. Cease is Automated via syncing between Gamma and Microsoft post Order Cease process.</td></tr>
<tr><td>Sub-processors</td><td>AWS, Azure</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet – MS Teams Direct Routing

Version 2.1 – Sept 2024

<table>
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<tr><td>Email address (company)</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Job Title</td><td></td><td>✓</td><td></td></tr>
<tr><td>MSTeams</td><td></td><td>✓</td><td></td></tr>
<tr><td>ID (Company, social media, service)</td><td>✓</td><td></td><td></td></tr>
<tr><td>SIP address</td><td></td><td>✓</td><td></td></tr>
<tr><td>Data variables (open text information)</td><td>✓</td><td>✓</td><td></td></tr>
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<tr><td>Data Retention Period:</td><td>Gamma Voice WebApp Database - Unlimited from 'at capture'
Gamma Voice WebApp Logs - 6 months from 'at capture'
Gamma Portal SIP Database - unlimited from 'at capture'
Product Lifetime as per SIP order contractual terms. Cease is Automated via syncing between Gamma and Microsoft post Order Cease process.</td></tr>
<tr><td>Sub-processors</td><td>AWS, Azure</td></tr>
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Product Privacy Data Sheet - Horizon Collaborate

Version 2.1 – Sept 2024

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<tr><td>Data Retention Period:</td><td></td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
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Product Privacy Data Sheet - Horizon for MS Teams

Version 2.1 – Sept 2024

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<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
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Product Privacy Data Sheet - Horizon Integrator CRM

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Product Privacy Data Sheet - Horizon Soft Client

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<tr><td>Username</td><td>✓</td><td></td><td></td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>Retention Times for data are attributed to the main Horizon Business Phone System product. The only data Soft Client is responsible for creating is direct message content. Following customer deletion of messages, Gamma has a deletion delay set to 365 days</td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
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Product Privacy Data Sheet - Horizon Call Queuing

Version 2.1 – Sept 2024

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<tr><td>CDR data[3]</td><td>✓</td><td></td><td></td></tr>
<tr><td>Call recordings</td><td></td><td>✓</td><td></td></tr>
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<tr><td>Company identifiers (Product specific, account numbers etc)</td><td>✓</td><td></td><td></td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>Script is set to delete any data older than 32 days (call recordings) All other data is held as part of Horizon Product CDR data included as time/date stamp and other info for details of voicemail</td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
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Product Privacy Data Sheet - Horizon Receptionist Console

Version 2.1 – Sept 2024

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<tr><td>Company Address</td><td>✓</td><td></td><td></td></tr>
<tr><td>Contact details (telephone/DDI/Mobile)</td><td>✓</td><td></td><td></td></tr>
<tr><td>CDR data[3]</td><td>✓</td><td></td><td></td></tr>
<tr><td>Username</td><td>✓</td><td></td><td></td></tr>
<tr><td>Job Title</td><td>✓</td><td></td><td></td></tr>
<tr><td>Company identifiers (Product specific, account numbers etc)</td><td>✓</td><td></td><td></td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>Receptionist Console does not retain or create its own data</td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet - Horizon Contact Centre

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<tr><td>Email address (company)</td><td>✓</td><td></td><td></td></tr>
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<tr><td>Social Media URL</td><td></td><td>✓</td><td></td></tr>
<tr><td>Username</td><td>✓</td><td></td><td></td></tr>
<tr><td>Data variables (open text information)</td><td></td><td>✓</td><td></td></tr>
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</td></tr>
<tr><td>Data Retention Period:</td><td>Horizon Call Centre does not retain of create its own data</td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet - Circleloop

Version 2.1 – Sept 2024

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<tr><td>Call Statistics</td><td></td><td>✓</td><td></td></tr>
<tr><td>Call recordings</td><td></td><td>✓</td><td></td></tr>
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</td></tr>
<tr><td>Data Retention Period:</td><td>Data is retained for lifetime of account to allow ongoing operation of service (e.g., it is possible for users to access historical call analytics/recordings for the life of their account). Data retained for 1 month after account closure to allow grace period for potential reactivation of services. Customer Data and Call Recordings auto deleted 1 month after account closure.</td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
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Product Privacy Data Sheet - Advanced Call Analytics

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<tr><td>Company identifiers (Product specific, account numbers etc)</td><td>✓</td><td></td><td></td></tr>
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<tr><td>Data Retention Period:</td><td>13 months for all data types.
Management reports are stored locally</td></tr>
<tr><td>Sub-processors</td><td>Akixi</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
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Product Privacy Data Sheet - Broadband

Version 2.1 – Sept 2024

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<tr><td>Company identifiers (Product specific, account numbers etc)</td><td>✓</td><td>✓</td><td></td></tr>
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<tr><td>Data Retention Period:</td><td>DataServices 1A - Database is Unlimited
DataServices B2B - Database is Unlimited
Gamma Portal Application - Middleware Logs is Unlimited</td></tr>
<tr><td>Sub-processors</td><td>BTW, BTOR, TalkTalk, Virgin Media</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
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Product Privacy Data Sheet - Assured Broadband

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Gamma Portal Application - Middleware Logs is Unlimited</td></tr>
<tr><td>Sub-processors</td><td>BTW, BTOR, TalkTalk, Virgin Media</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
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Product Privacy Data Sheet - Ethernet Broadband

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DataServices B2B - Database is Unlimited
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Product Privacy Data Sheet - Gamma SoGEA

Version 2.1 – Sept 2024

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<tr><td>The purpose of the processing</td><td>Gamma will process the below data types in relation to the legitimate interest of providing a service which involves the processing of personal data for the benefit of the customer and to comply with legal obligations.</td></tr>
<tr><td>Duration of the processing</td><td>Duration of the service</td></tr>
<tr><td>Categories of Data Subject and Data Types</td><td>
<table>
<tr><th>Data Types
(May be classed as Personal Data in bold)</th><th>Channel Partner/ Reseller</th><th>Customer</th><th>Contact</th></tr>
<tr><td>Name (Title, First Name and/or Surname)</td><td>✓</td><td></td><td>✓</td></tr>
<tr><td>Company Name</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Company Address</td><td></td><td></td><td>✓</td></tr>
<tr><td>Contact details (telephone/DDI/Mobile)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Email address (domain @xxx)</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Email address (company)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Device Identifiers (asset tags, serial numbers etc)</td><td></td><td>✓</td><td>✓</td></tr>
<tr><td>Company identifiers (Product specific, account numbers etc)</td><td>✓</td><td>✓</td><td></td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>DataServices 1A - Database is Unlimited
DataServices B2B - Database is Unlimited
Gamma Portal Application - Middleware Logs is Unlimited</td></tr>
<tr><td>Sub-processors</td><td>BTW, BTOR, TalkTalk, Virgin Media</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet – Business Only Mobile

Version 2.1 – Sept 2024

Description	Details
The purpose of the processing	
Duration of the processing	
Categories of Data Subject and Data Types	
Data Retention Period:	
Sub-processors	
Transfers outside the UK:	

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Product Privacy Data Sheet - Advanced Network Services

Version 2.1 – Sept 2024

<table>
<tr><th>Description</th><th>Details</th></tr>
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<tr><th>Data Types
(May be classed as Personal Data in bold)</th><th>Channel Partner/ Reseller</th><th>Customer</th><th>Contact</th></tr>
<tr><td>Name (Title, First Name and/or Surname)</td><td>✓</td><td></td><td>✓</td></tr>
<tr><td>Company Name</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Company Address</td><td></td><td></td><td>✓</td></tr>
<tr><td>Contact details (telephone/DDI/Mobile)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Email address (domain @xxx)</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Email address (company)</td><td>✓</td><td>✓</td><td>✓</td></tr>
<tr><td>Device Identifiers (asset tags, serial numbers etc)</td><td></td><td>✓</td><td>✓</td></tr>
<tr><td>Company identifiers (Product specific, account numbers etc)</td><td>✓</td><td>✓</td><td></td></tr>
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<tr><td>Data Retention Period:</td><td></td></tr>
<tr><td>Sub-processors</td><td>None</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
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Product Privacy Data Sheet - SmartAgent

Version 2.1 – Sept 2024

<table>
<tr><th>Description</th><th>Details</th></tr>
<tr><td>The purpose of the processing</td><td>Gamma will process the below data types in relation to the legitimate interest of providing a service which involves the processing of personal data for the benefit of the customer and to comply with legal obligations.</td></tr>
<tr><td>Duration of the processing</td><td>Duration of the service</td></tr>
<tr><td>Categories of Data Subject and Data Types</td><td>
<table>
<tr><th>Data Types
(May be classed as Personal Data in bold)</th><th>Channel Partner/ Reseller</th><th>Customer</th><th>Contact</th></tr>
<tr><td>Call Recordings</td><td>N/A</td><td>✓</td><td>✓</td></tr>
<tr><td>Configuration Data</td><td>N/A</td><td>✓</td><td>✓</td></tr>
<tr><td>Email Attachments</td><td>N/A</td><td>✓</td><td>✓</td></tr>
<tr><td>Device Identifiers (asset tags, serial numbers, configuration data etc)</td><td>N/A</td><td>✓</td><td></td></tr>
<tr><td>Data Variables</td><td>N/A</td><td>✓</td><td>✓</td></tr>
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<tr><td>Data Retention Period:</td><td>Customer defined</td></tr>
<tr><td>Sub-processors</td><td>AWS</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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Product Privacy Data Sheet – Horizon with Webex

Version 2.1 – Sept 2024

<table>
<tr><th>Description</th><th>Details</th></tr>
<tr><td>The purpose of the processing</td><td>Gamma will process the below data types in relation to the legitimate interest of providing a service which involves the processing of personal data for the benefit of the customer and to comply with legal obligations.</td></tr>
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<tr><td>Categories of Data Subject and Data Types</td><td>
<table>
<tr><th>Data Types
(May be classed as Personal Data in bold)</th><th>Channel Partner/ Reseller</th><th>Customer</th><th>Contact</th></tr>
<tr><td>Email address (company)</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Username</td><td></td><td>✓</td><td></td></tr>
<tr><td>Name (Title, first name, and/or Surname)</td><td></td><td>✓</td><td>✓</td></tr>
<tr><td>Contact details (contact/DDI/mobile)</td><td></td><td>✓</td><td>✓</td></tr>
<tr><td>Company Identifiers (Product specific account numbers etc</td><td>✓</td><td>✓</td><td></td></tr>
<tr><td>Webex Bolt-on (licence)</td><td></td><td>✓</td><td></td></tr>
<tr><td>Company Address</td><td></td><td>✓</td><td></td></tr>
<tr><td>CDR Data</td><td>✓</td><td></td><td></td></tr>
</table>
</td></tr>
<tr><td>Data Retention Period:</td><td>Cisco Webex Platform data retention policies are industry practice at 7 years post cessation.
CDR Data – is kept for 42 days.
Transit data – up to 24 hours.
All other data – for the duration of the product.</td></tr>
<tr><td>Sub-processors</td><td>AWS, Cisco</td></tr>
<tr><td>Transfers outside the UK:</td><td>None</td></tr>
</table>

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