



IDN Privacy and GDPR Compliance Statement

Edition May 2018

Important changes to Clients' data and how we communicate with our clients.

Here at IDN we are committed to protecting and safeguarding our client's personal data. Keeping clients' data safe and increasing transparency are important to IDN. The new European General Data Protection Regulation (GDPR) takes effect on 25th May 2018. As per the new GDPR Regulations, IDN have updated our Privacy statement and our Terms and conditions to provide more information to our Clients about their privacy rights. If clients need clarification, please contact your account manager.

INTRODUCTION

At IDN we are committed to ensuring that any personal data we hold about the Client is protected in accordance with data protection laws and is used in line with Clients' expectations.

At IDN Customer information is only held in relation to:

- Client accounts held at the company and for purpose of providing a service to the client.
- Client information is not used for any other data processing purposes.
- Customer information is not shared with any third party or any other company.
- No third party have access to client information or client call data.
- Where customer information is held in digital format, it is under SSL security encryption and only accessible via secure web interface.
- Access to this data is only available to the client and to company customer care representatives for purpose of delivering services.

This privacy notice explains what personal data we collect, why we collect it, how we use it and how we protect it.

What personal data do we collect?

We collect personal data about our client to provide a Telecommunication service to the client.

Services provided to Direct End-user /Customer: Personal details that we collect about the client are as per the customer contract form and include only:

- Client's name, address, contact telephone number, Fax, email, Mobile number, Land line telephone number, Method of payment for the service: credit card number, expiry date, validation date, issue number, CVS number, Name & address on the card
- Call detail records: number dialed, number dialed from, date of call, duration of call, carrier used to connect Client's call, rate charged, detailed logging on each call

Services provided to Businesses/ Telecom operators/carriers: Personal details that we collect about our clients are as per the Bilateral agreement, interconnect agreement or Reseller agreement and include only:

- Business name, company registration number, business address, director name, address, for invoicing/billing, emails addresses for communication and notices, telephone numbers, Bank details to make payments
- Call detail records: number dialed, number dialed from, date of call, duration of call, carrier used to connect Client's call, rate charged, detailed logging on each call

Why we collect this information and the legal basis for handling Clients' data

IDN Limited, a company incorporated under the laws of England and Wales, and registered under number 3204967, whose registered office is at 27 Thames Street, Hampton TW12 2EW, UK.

IDN use personal data about our client in order to provide Telecommunication services to our client and fulfil the contractual arrangement our client has entered into.

This includes using Clients' data to:

- Ensure we are proving a customer account to the correct person
- Enable our client to make calls
- If a business, to enable the correct company to make calls
- Invoice and bill our client for the calls made
- If business customer to make payments to assigned bank accounts
- If personal end-user accounts, to enable our client to make credit or debit card payments
- Contact our client to update records
- to support our client in case of call quality, billing issues, re-routes,
- to manage contact and respond to any questions our client may have
- to process Clients' claim where applicable
- to keep our client updated with information about our services

Who we share Clients' data with

In order for us to deliver Telecommunication services we will also share Clients' data as required with the following categories of recipients:

- Ofcom (*The Office of Communications, commonly known as Ofcom, is the UK government-approved regulatory and competition authority for the broadcasting, telecommunications and postal industries of the United Kingdom*) - during an inspection or following a complaint about our service
- HM Revenue & Customs- during an inspection or following a complaint, this is mainly for business clients' Banking services to process chip and pin and/or direct debit or credit card payments (as applicable)
- the Local Authority or the Local Police (in case of an inquiry or to support an investigation as applicable)
- the government's eligibility checker (as above)
- our insurance underwriter (if applicable)
- our Telecom software management engineers (if applicable)

We will also share Clients' data if:

- We are legally required to do so, for example, by law, by a court or the Charity commission;
- to enforce or apply the terms and conditions of Clients' contract with us;
- to protect our client and others; for example, by sharing information with the police;
- it is necessary to protect our/or others rights, property or safety
- we transfer the management of the company, in which case we may disclose Clients' personal data to the prospective buyer so they may continue the service in the same way

We will never share Clients' data with any other organization to use for their own Purposes

How do we protect Clients' data?

We protect unauthorized access to Clients' personal data and prevent it from being lost, accidentally destroyed, misused, or disclosed by

- No third party have access to client information or client call data.
- Where customer information is held in digital format, it is under SSL security encryption and only accessible via secure web interface
- All electronic devices are password protected.
- All paper copies are locked away securely.
- Due to the complex data types and data sources IDN use various management techniques such as:
 - Network event records (from mediation, billing or signalling messages)

- Customers' services profile information
- Profile the use of services for each individual subscriber
- Monitor different origination and termination identity types.
- IDNs servers are stored in a secure room which is always locked and operated by a security alarm
- IDN's property is well secured with a security camera and entry granted after identity is Verified
- We are covered by building and contents insurance in the risk of theft.
- We follow the ISO9001 Industry standard for risk management

How long do we retain Clients' data?

We retain Clients' personal data for up to 5 years after our clients no longer use our services, or until our next inspection after our client has left us. Call detail records are kept for longer according to the legal requirements.

Clients' rights with respect to their data

Clients have the right to:

- request access, amend or correct Clients' personal data
- request that we delete or stop processing Clients' personal data, for example where the data is no longer necessary for the purposes of processing; and
- request that we transfer Clients' personal data to another organization

If client wishes to exercise any of these rights at any time or if client has any questions, comments or concerns about this privacy notice, or how IDN handle Clients' data please contact IDN directly at address below. If the client continues to have concerns about the way Clients' data is handled and remain dissatisfied after raising Clients' concern with IDN, client has the right to complain to the Information Commissioner Office (ICO). The ICO can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or ico.org.uk

Changes to this notice

We keep this notice under regular review. Client will be notified of any changes where appropriate.

Client's comments

If the client would like to contact IDN, please send your message to:

IDN Limited, 27 Thames Street, Hampton, TW12 2EW, UK or email: info@idnlimited.com. Telephone: +44 208 408 8899