



## **DATA and DATA PROTECTION**

Camtel Associates Limited (CA Ltd) are compliant with the General Data Protection Regulations (GDPR) and Data Protection Act. We continually monitor and update our processes where required, particularly in the face of future changes to data protection legislation that will be in force from 25th May 2018. As part of the various services and products we offer our customers what we may hold or have access to data that can identify individuals to be able to provide our customers with the services, products and support that is agreed through contracts signed for EE/BT /EE's Mainline Distribution & O2. In all instances, access to such data is controlled and limited to specific individuals. This information held is solely specific and a standard requirement requested by the mentioned airtime providers of such contracts and is not shared with any other outside party.

### **Processing Information**

#### **Scope and Purpose of Processing**

Personal data is held for the purposes of the provision of telecommunication services and related products. The personal data held is obtained in support of contractual arrangements and is necessary under the 'legitimate interests' pursued by the controller of CA Ltd as defined in article 6.1 of the GDPR. The facility to opt out of marketing communications remains but excludes operational or pricing communications.

#### **Nature of Processing**

CA Ltd does not undertake any automated decision making as defined by article 22 of the GDPR. Data will be processed internally by the sales department for the purposes of objective and permission-based marketing only.

#### **Duration of Processing**

CA Ltd will maintain personal data for the duration of contracts during the provision of telecommunication services and products. Thereafter, the data will be held for a 'reasonable' period, depending on the nature of the relationship with the customer. The data will be deleted when the retention of that data can no longer be justified under the provisions of the Data Protection Act and is not overruled by competing legislation or regulations. Alternatively, CA Ltd will omit such Data held from our records should we receive written requests from our customers past and present.

## **Types of Personal Data**

The personal data held will include:

- Name
- Position
- Business Address
- Telephone Number(s)
- Email Address(es)

No 'sensitive data' (as defined by the Data Protection Act) or 'special categories of personal data' (as defined by the GDPR) are held against any current, former or prospective customers.

## **Categories of Data Subject**

The data subjects whose data may be held by CA Ltd is restricted to that of existing, former or prospective customers and associated contacts. This data falls under the category of 'personal data' and does not include any 'sensitive data' (as defined by the Data Protection Act) or 'special categories of personal data' (as defined by the GDPR).

## **Data Sharing**

There is no routine data sharing of person identifiable data. Where exceptions exist, these concern the management of systems where providers require sample data for the purposes of de-bugging systems or processes. In these circumstances we would implement a formal data sharing agreement to ensure that the transaction is handled for the purposes of the 'system fix' and to obtain a legal platform to ensure that access, security and disposal of the data adheres to our requirements in terms of current and future ISO accreditation and Data Protection legislation.

In terms of transactional data (non-person identifiable data), for example direct debit data, there is a robust data sharing agreement and corresponding process for exchanging data with all our suppliers. No person identifiable data is exchanged or transferred routinely.

We may need to share your information with a third party in order for us to provide continuity of our services to you in line with our contractual agreement (mainly for delivery of spare parts/equipment direct to site/installation of equipment and contractual set-up with your chosen airtime supplier).

## **Data Hosting**

The majority of our data is hosted in secure cloud/data centre environments accessible only through fully password protected pc/web portals and, or in the case of our CRM, a multi-layer password authentication process. Our data is held within the EU and where practicable the data will be held in a UK based environment. Some data is held on secure local servers with the relevant backup and security protocols. Access to all systems is managed through robust permission structures based upon the requirements of the individual's role that are regularly reviewed.

## **Out of Hours Access**

There are a number of specific roles within our organisation that require 'specified individuals' to have access to data outside of operational hours. For example, to manage and react to incidents of exceptional call reporting (fraudulent calls); access systems remotely, or on site, for the purposes of support, device failures or errors. In these circumstances, access is either on our premises, or is governed by the same security measures outlined in data hosting.

## **Access to Customer's Data for the Provision and Support of Services**

Where CA Ltd has provided a cellular device, we will retain information such as make, models, IMEI and cellular phone/sim numbers for our records and this will include date(s) of provision. A Requirement Document such as a completed and signed Purchase Order form will contain the user's information for the cellular device supplied. The data we hold as part of these records will not alter after point of sale.

As part of our ongoing support to these contracts, CA Ltd will provide designated CA Ltd staff with remote access to the customer's contact details by agreement with the customer. In these instances, and for the provision of such on-going support services, CA Ltd will access the system that may provide access to information that may identify an individual, including:

- User Name
- User email
- User Direct Dial Number

As a 'Data Processor' in the context of the Data Protection Act, this data will only be accessed where necessary and for the purposes of support and service provision. CBST Ltd is, at the request of the customer, able to access, alter and/or remove this data along with where required, reset user's passwords. CBST Ltd is not able to view or access user's passwords. It remains the responsibility of users to change and update their passwords in line with the customer's security policies.

### **Risk**

- There have been no significant security incidents in the last twelve months.
- The GDPR Risk Register of CA Ltd contains all risks identified to date and these are managed as determined by our internal processes, reporting to the organisations Risk Management Group

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