



Privacy Notice – general

- *V1*
- *22/05/2018*
- *Penny Hogan*

Contents

EBT PRIVACY NOTICE	3
<i>Overview</i>	<i>3</i>
<i>Purpose</i>	<i>3</i>
DATA PROTECTION LAWS	3
HOW WE USE YOUR DATA	4
HOW WE WILL CONTACT YOU	4
SHARING YOUR DATA WITH THIRD-PARTIES.....	4
HOW LONG WE WILL KEEP YOUR DATA	4
HOW WE PROTECT YOUR DATA.....	5
MARKETING	5
YOUR RIGHTS.....	5
MAKING A REQUEST	6
MAKING A COMPLAINT	6
OUR PRIVACY POLICY.....	6
HOW TO CONTACT US	6
REFERENCES.....	7
AMENDMENTS.....	8

EBT Privacy Notice

EBT maintenance Ltd is a company registered in England and Wales (collectively referred to as "EBT", "we" or "us" in this notice).

Overview

EBT Maintenance Ltd, t/a EBT Communications, provides business to business communication solutions and communication services in partnership with our trusted partners.

Maintaining the security of your data is a priority at EBT, and we are committed to respecting your privacy rights. We are dedicated to handling your data fairly and legally at all times and to be open and transparent about the data we collect about you and how we use it.

As a telecommunications provider we need your personal information to communicate with you and your staff to enable the smooth running and maintenance of your communication system and fulfil our contractual responsibilities to you.

Purpose

The following privacy notice clarifies,

- How we use your data
- What personal data we collect
- How we ensure your privacy is maintained
- Your legal rights relating to your personal data

Data Protection Laws

Data protection laws require us to meet certain conditions before we can use your personal information in the manner described in this Privacy Notice. To use your personal information, we will rely upon one or more of the criteria contained in the regulation under [Art. 6 GDPR, Lawfulness of processing](#).

After reviewing the data, we collect from our customers, we found the following points to be most relevant for our data collection.

- Contractual Obligations. We use your personal information and the information of your employees in order to provide you with our services and allow us to install and maintain your communication services.
- Legal Obligations. From time to time we may be required by law to use your personal information.
- Legitimate Interests. For example, call recording to ensure our staff provide the best possible service to our customers.
- Consent. In the case of marketing you will always be given the choice if you wish us to use your personal information, and we will not share this data with any third-party companies without your explicit consent for marketing purposes.

How we use your data

EBT and our trusted partners use personal data:

- To help us to manage and maintain your communication needs
- To carry out the tasks to meet our contractual responsibilities to you
- To provide products and services to you
- To enable EBT to manage customer service requirements
- Where we have a legal right or duty to use or disclose your information, (for example in relation to a public authority or in a legal dispute)

How we will contact you

To facilitate and meet your contractual needs with EBT Maintenance Ltd we will contact you via email, telephone or post. When using these services we may need to record additional information such as passwords, online identifiers and call recordings.

Sharing your data with third-parties

In order to provide you with our services, we may need to share your personal data with some of our trusted partners. This includes:

- Outside billing companies, suppliers of voice, data and mobile products and services, including a license management system. This information will be discussed and documented with you prior to delivery to ensure you are provided with clear information on how your data will be shared and used.
- In the event that we are bought, or we sell any businesses or assets, in which case we may disclose your personal information to the prospective buyer. This information will be covered by a confidentiality agreement.
- For administration and technical purposes.
- In order to carry out our contractual agreement with you.

Our partners are also required to comply with the new data protection regulations and to be transparent about any disclosures. We only allow our partners to handle your personal data when we have confirmed that they apply appropriate data protection and security controls.

Further details on our third-party companies can be provided upon request.

How long we will keep your data

We will not retain your information for longer than necessary and will be used for the purpose set out in this notice. Please note, different retention periods apply for different types of data, however, the longest we will normally hold any personal data is 6 years, unless required by law to retain the information for longer, such as insurance and health and safety records.

Your personal information will be retained under one or more of the following reasons:

- For the duration of your contract with us or our third-party partners
- Where for a limited time we are using your information to improve or resolve a communications issue as part of our contractual obligation with you, such as call recording or technical support
- Once your contact ends with us, other than lawful requirements or if you have made a specific request to retain your personal information, we will retain your personal data for a period of 5 years. After which time your data will be deleted from our systems. You have the right to access or request the right to be forgotten within this time.

How we protect your data

EBT are committed to keeping your personal data safe and secure:

Our security measures are:

- Encryption of data
- Regular cyber security assessments of our services and service providers
- Security contracts to protect IT infrastructure
- Review and maintain internal policies
- Continued on-going staff training

Marketing

If you have opted in to receive marketing material, we may contact you via telephone, email, post or via our website depending on your preference to let you know about any offers we think may help improve your communications solutions.

You can request to opt-out of any marketing communication at any point.

Your Rights

You have the following rights:

- The right to access, (the right to ask for a copy of personal data that we hold about you)
- The right of erasure (or to be forgotten), (the right to request that we delete personal data held on you)
- The right of rectification, (the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you)
- The right to object, (the right to opt out of any marketing communications that we may send you and to object to us using or holding your personal data if we no longer have a legitimate reason to do so)
- The right to restrict processing, (the right to ask us to restrict processing of data, which means, we would hold information about you securely for your benefit but not use it)

Making a request

If you would like to make a request about your personal data, when making the request, to ensure we do not disclose your personal information to someone who is not entitled to it, please submit a written request including the following information:

Your name, company, address, the information you are requesting, including dates to and from if applicable.

First requests are free of charge, for further requests we reserve the right to charge a reasonable fee, reference [Art. 13 \(3\) GDPR, Right of access by the data subject](#).

Making a complaint

We continue to carry out reviews and on-going assessments of all our engineering systems, platforms and devices to ensure we continue a disciplined approach to our data handling. However, if you have any concerns or wish to make a complaint about our data handling, please send an email to service@ebtmaintenance.co.uk or call us on 0800 840 4181.

If you are not satisfied with our response regarding our handling of your personal data, you may wish to make a complaint to the Information Commissioners Office.

Our Privacy Policy

If you require further documentation or have any queries regarding our Privacy Policy, please contact us and we will be happy to discuss these with you. Our Privacy Policy will be reviewed and updated regularly to comply with the new regulations and ensure we protect your personal information and continue to serve our contractual duties to you.

How to contact us

If you have any questions or comments, please contact us at the following address:

Data Protection Officer
EBT Maintenance Ltd
Eastwood Link Office Park
4 Farrington Way
Eastwood
Nottingham
NG16 3BF

References

- Article 6 GDPR Lawfulness of processing <https://gdpr-info.eu/art-6-gdpr/>
- Article 15 (3) GDPR Right of access by the data subject <https://gdpr-info.eu/art-15-gdpr/>
- HR4UK, *Privacy Statement* (2018) Online: https://www.hr4uk.com/privacy_policy.aspx, [accessed May 2018]
- ICO, *Lawful basis for processing*, (2018) Online: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/> [Accessed May 2018]
- ICO, *Public Task* (2018) Online: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/public-task/> [accessed May 2018]
- ICO, *Special Category Personal Data* (2018) Online: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/> [accessed May 2018]
- Intersoft Consulting) *GDPR*, (2018) Online: <https://gdpr-info.eu/> [accessed May 2018]
- PrivacyPlan, article 4 EU GDPR “definitions” (2018), Online: www.privacy-regulation.eu/en/article-4-definitions-GDPR.htm [accessed April 2018]
- Retell, *how does GDPR affect Call Recording*, (2018) Online: <https://retell.co.uk/impact-gdpr-call-recording/> [accessed May 2018]

Amendments