



## Privacy and Personal Data Protection Policy

<b>Document Classification:</b>	<b>PCL Group of Companies (comprising of PCL Direct Ltd, Progressive Consulting Ltd &amp; Revolution Communication Ltd)</b>
<b>Document Ref.</b>	<b>GDPR-DOC-18</b>
<b>Version:</b>	<b>2</b>
<b>Dated:</b>	<b>14<sup>th</sup> May 2018</b>
<b>Document Author:</b>	<b>Sean McArdle</b>

### Revision History

Version	Date	Revision Author	Summary of Changes
V1	11 <sup>th</sup> May 2018	Sean McArdle	New Policy
V2	14 <sup>th</sup> May 2018	Sean McArdle	New revision

### Distribution

Name	Title
Sean McArdle	Director
Mohammad Elkateb	Director
Gary Ahimie	Director

### Approval

Name	Position	Date
Sean McArdle	Director	14 <sup>th</sup> May 2018

## Contents

1	INTRODUCTION & ACCEPTANCE .....	3
2	PRIVACY AND PERSONAL DATA PROTECTION POLICY & KEY POINTS.....	5
3	WHAT PERSONAL DATA WILL WE COLLECT .....	6
4	HOW DO WE USE YOUR PERSONAL DATA.....	7
5	HOW IS YOUR PERSONAL DATA PROTECTED.....	8
6	CONFIDENTIALITY OF COMMUNICATIONS .....	9
7	HOW LONG DO WE KEEP YOUR DATA .....	9
8	PERSONAL DATA ABOUT THIRD PARTIES .....	9
9	UPDATING OR DELETING PERSONAL DATA.....	9
10	PERSONAL DATA FOR MARKETING PURPOSES.....	10
11	MONITORING & RECORDING OF CALLS .....	10
12	CHILDRENS PERSONAL DATA.....	10
13	DATA PROTECTION RIGHTS .....	10
14	UPDATING YOUR PRIVACY POLICY .....	11
15	HOW TO CONTACT US.....	11

## List of Tables

TABLE 1 - TIMESCALES FOR DATA SUBJECT REQUESTS.....	12
---	----

# Data Privacy Statement

Last updated: May 2018

## 1. Introduction and acceptance of the Privacy Policy

PCL Group of Companies (comprising of PCL Direct Ltd, Revolution Communication Ltd & Progressive Consulting Ltd) provides world-class network, communications and merchant services for enterprises and wholesale customers in Europe, Asia and North America's largest business hubs.

At PCL Group of Companies (comprising of PCL Direct Ltd, Revolution Communication Ltd & Progressive Consulting Ltd) , your privacy is as important to us as it is to you. We have developed this policy because we want you to feel confident about the privacy and security of your personal data. PCL Group of Companies (comprising of PCL Direct Ltd, Revolution Communication Ltd & Progressive Consulting Ltd) is committed to protecting the privacy of individuals that enter into contracts with PCL Group, individuals who visit the Company's Web sites and ask for information, individuals who register to use PCL Group services as defined below, and individuals who register to attend the Company's corporate events.

The PCL Group Customer Privacy Policy (the "Privacy Policy" applies to all of the contracts, services and websites offered by PCL Group), which refer to this Privacy Policy. The term 'customer' or 'Customer' refers to customers, new customers (prospects), ex customers and visitors to our website, visitors to our trade shows or conferences and recipients of our digital services including marketing. The Privacy Policy defines how PCL protects your privacy and describes PCL's privacy practices in relation to the use of the Company's Web sites and the related applications, services, and programs offered by PCL Group (collectively, the "Services"), as well as individuals' choices regarding use, access and correction of personal information.

PCL Group of Companies (comprising of PCL Direct Ltd, Revolution Communication Ltd & Progressive Consulting Ltd) offers many different contracts and services for many different business purposes. The Privacy Policy applies to all our contracts, services and websites, unless otherwise expressly provided, they are collectively referred to as

“Contracts”, “Services” and “Websites” throughout this Privacy Policy. This Privacy Policy is without prejudice to specific local data protection requirements and additional local privacy notices that may be posted on our Websites, that may be included in our Contracts or that may be notified to the customer from time to time in relation to our Services.

By entering into a Contract with PCL or using PCL’s Services, you agree and consent to the collection and use of your personal data as outlined in this Privacy Policy. Your data will not be disclosed. Before using or submitting personal data on certain sections of the Websites, in relation to a Contract or as part of our Services, you might be asked to confirm your acceptance of this Privacy Policy, including electronically by checking box(es) and/or clicking on "I ACCEPT" or similar button(s). Your action in checking such box(es) and/or clicking on such button(s) and your use of this Website or of our Services signify that you agree to the collection & processing of your personal data as described in this Privacy Policy. Our records of your acceptance of this Privacy Policy, the date thereof, and of all future amendments to this Privacy Policy, shall be regarded as conclusive and written evidence of your consent.

The Privacy Policy contains:

- The key points you need to know about how we collect and use your personal data
- What personal data we collect about you
- How we use any personal data we might collect about you
- For which purposes we use your personal data
- How we protect the security and confidentiality of your personal data
- The choices and rights available to you regarding our use of your personal data
- How you can contact us about our privacy practices and to exercise your rights

The Privacy Policy was last reviewed and updated by the date referenced at the top of the document and is effective as of that date.

## 2. Key points you need to know about how we collect and use your personal data

- We collect and use your personal data to administer our relationship with you, including to respond to your enquiries or complaints, to provide our products and Services to you, to manage our Contracts with you, to inform you about our products and services, partners, promotions and events, to administer and improve our Websites and Services, to respond to requests from authorities, to comply with our contractual and legal obligations, and for other legitimate business purposes. PCL Group of Companies (comprising of PCL Direct Ltd, Revolution Communication Ltd & Progressive Consulting Ltd) does not share, sell, rent or trade personal data with third parties.
- When you express an interest in obtaining additional information about the Services or registering to use the Web sites or other Services, or registering for an event, you provide the Company with personal contact information, such as name, company name, address, phone number, and email address (“Required Contact Information”) to contact you. In addition, when you purchase the Services or get registered for an event, PCL may also require you to provide the Company with means for financial qualification and billing information, such as billing name and address, and the number of employees within the organization that will be using the Services (“Billing Information”) which is not considered personal data.
- We may ask you for information to enable us to provide a Service to you and we collect this information by telephone, written/digital correspondence. We do not use cookies and other technologies to track the use of our websites and services.
- Subject to your consent where required by law, we may use your personal data to conduct marketing, promotional and informational activities and to perform business analytics, satisfaction surveys or market research and conduct direct marketing.
- This privacy policy only applies to how to PCL deals with your personal data. It does not apply to any to any other company or to any other company’s websites even if you have accessed them through PCL. If you disclose your personal data to other companies your information will be dealt with according to their privacy practices.

### **3. What personal data will PCL Group of Companies (comprising of PCL Direct Ltd, Revolution Communication Ltd & Progressive Consulting Ltd) collect?**

For the purposes of this Privacy Policy, "personal data" means any information that identifies you, that could be used to identify you or that relates to you, and that you submit about you when interacting with us and/or is otherwise collected by us when you visit the Websites, by phone through our customer service, by writing through order forms or in another manner. During our relationship with you we may collect and process your personal data, such as your name, address, telephone, email and other contact details, and any other information relating to you which you may provide, in the following cases:

- visit our Websites and look at our products and Services;
- enquire about our products and Services or contact our customer service;
- enter into a Contract with us and purchase our products and Services;
- participate in a promotion, event, survey or other marketing campaign we organize; or
- sign up for our newsletters and other promotional materials via social media.

#### [Personal Data that you provide us](#)

The types of personal data we may obtain in connection with the previous cases are as follows:

- your name, address, and contact details (such as telephone, mobile and fax numbers, email address)
- details of contact persons (such as name, address, function/title, telephone and fax numbers, e-mail address);
- Services provided, including online Services;
- names, email addresses and telephone numbers of third parties you provide to us;
- online account details including username, password and other credentials used to access PCL's products and Services;
- financial and payment data such as banking details, invoices and payment terms as well as any personal data for fulfilling and legitimate processing billing information;
- complaints and enquiries;
- business profile;
- tax identification number where you request products or services that require such

#### [Personal Data collected by automated means](#)

When you visit our Websites or use our social media Services, subject to your prior consent where applicable by law, we may collect personal data without you actively submitting such information, by automated means, using technologies such as search engines.

### Personal Data collected by third parties

PCL may also receive information about Customers from other sources, including third parties from whom we have purchased data, and combine this information with Data we already have about you. This helps us to update, expand and analyse our records, identify new customers, and create more tailored advertising to provide products and services that may be of interest to you. We will ensure that any marketing campaigns are aligned to GDPR requirements.

## 4. How do we use your personal data?

PCL shall only process your personal data for the purposes described in this Privacy Policy or as otherwise permitted under applicable law. The processing of your personal data by PCL for the purposes described hereunder is based on your explicit consent or on the necessity to process your personal data for the purposes of our legitimate interests, as provided by Article 9, 2., (a) and (f) of the General Data Protection Regulation (EU) 2016/679 of 27 April 2016 (“GDPR”).

Your personal information may be processed, by PCL, for purposes including:

- administer our relationship with you, including to respond to your inquiries or complaints;
- to provide any goods, Services or information you have requested and information about our products and Services;
- to administer, operate, maintain, and improve the Websites and our Services;
- for efficient customer management relationship;
- to simplify access to some interactive features on our Websites or Services;
- to manage your accounts, orders, invoices and payments;
- to manage and provide after-sale services;
- to administer accounting and taxes;

- to respond to requests from administrative or judicial authorities; and
- to comply with applicable laws and regulations.

Providing personal data for these purposes is necessary and refusal would make it impossible for PCL to manage the Contract with you or to comply with its contractual and legal obligations.

Providing personal data for marketing purposes is optional and refusal will have no consequence on the performance of any Contract with PCL.

In order to provide you with a better experience and to improve the quality of our Services, to the fullest extent permitted by applicable law, we may combine the information you submit to us with other information that we may receive from you, from third parties, or with other public demographic information.

We may also disclose personal data about you when you explicitly consent (via contract or other legal instrument) to such transfer or when we believe disclosure is necessary or appropriate for our legitimate interests (or those of the third party to whom we disclose your data), provided that they are not overridden by the data subject's interests or fundamental rights and freedoms, in accordance with applicable laws.

We may share with third parties certain pieces of aggregated, non-personal information, such as how our customers use of our Services or Websites. Such information would not identify you individually.

Please note that when you order goods and services from PCL, the Company may make enquiries about you for credit reference purposes. These enquiries include searching your records held by a credit reference agency. At all times where your information is disclosed to us we will protect it in accordance with this policy and keep it secure.

## **5. How is your personal data protected?**

PCL Group of Companies (comprising of PCL Direct Ltd, Revolution Communication Ltd & Progressive Consulting Ltd) has appropriate policies and technical and organizational measures in place to safeguard and protect your personal data against unlawful or unauthorised access, accidental loss or destruction, damage, unlawful or unauthorised use and disclosure. We will also take all reasonable precautions to ensure that our staff

and employees who have access to personal data about you have received adequate training.

## **6. What about the confidentiality of communications?**

We do have access to the content of your communications, such as your call data records. However, we do not have access to e-mails, SMS or Internet sessions. This information is encrypted during its transfer on our network. Where applicable this information is protected by adhering to telecommunication secrecy legislation. Please note that pre-recording of your calls is a separate service which you have to ask for at the beginning of your contract. We do not pre-record calls without prior instruction from our customers.

## **7. How long do we keep your personal data for?**

We have a retention policy for personal data that we adhere to, in line with legal and statutory requirements. We also may retain your information for the period of time needed for PCL to pursue legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

## **8. What happens when you provide us with personal data about third parties?**

If you provide us with personal data about third parties, you warrant, represent, and undertake that you have complied with applicable data protection laws including informing and obtaining all necessary consents and approvals for the provision of such personal data to PCL and the processing by PCL of this personal data as described in this Privacy Policy.

## **9. How can you update or delete your personal data**

In accordance with applicable data protection laws, you have the right to access personal data we hold about you and request the rectification or erasure of any inaccurate data. You may exercise such rights by contacting us as described under the "What are your data protection rights?" section below.

To ensure any details we hold about you remain accurate, please update your personal data if it changes or send a request to us as described under the "What are your data

protection rights?" section below. If you close your account we may, for limited periods and in accordance with applicable law, retain some personal data in order to comply with legal obligations or for other proper purposes, such as legal retention obligations, collecting outstanding debts or resolving legal disputes.

When you request to be removed from certain marketing offers, you will, in accordance with applicable data protection laws, be added to the relevant internal suppression list(s) to ensure your request is complied with.

#### **10. How do we use your personal data for marketing purposes?**

We may use your personal data to conduct marketing, promotional and informational activities and to perform business analytics, satisfaction surveys or market research and direct marketing purposes in general, including sending notifications about updates to the Websites, information on our services we think may be of interest to you, initiatives or events by mail, e-mail, phone, fax, SMS, MMS or other electronic means. However, we will only do so in accordance with GDPR requirements prior to being contacted in this way and/or subject to relevant legal requirements.

#### **11. How do we use your personal data for monitoring and recording of calls?**

Your telephone calls to us will not be recorded.

#### **12. How do we treat children's personal data?**

We do not knowingly collect personal data from anyone under the age of 18 or knowingly allow such persons to register on our Websites or Services.

#### **13. What are your data protection rights?**

In accordance with applicable data protection law, you have a right to:

- obtain confirmation of the existence of, and to request a written copy of the personal information PCL holds about you.
- have any inaccurate information about you corrected;
- have personal data we hold about you deleted, blocked or removed;
- withdraw your consent where relevant, without affecting the lawfulness of processing

based on your consent before its withdrawal;

- restrict the processing we make in relation with your personal data;
- receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format in order to transmit them to another data controller;
- object to the use of your details for marketing activities and other promotional activities, as described under the "How do we use your personal data for marketing purposes?" section previous; and
- lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of your personal data relating infringes applicable data protection law.

In case you wish to exercise any such rights, please send a written and signed request to PCL Group of Companies (comprising of PCL Direct Ltd, Revolution Communication Ltd & Progressive Consulting Ltd) as described under the "How can you contact us?" section below.

#### **14. How can we update this Privacy Policy?**

We reserve the right to review this Privacy Policy at any time. Where appropriate or required by law, we will notify you about the new privacy Policy by posting appropriate notice on our Services or Website or by e-mail (to the extent that we have your e-mail address). We encourage you to periodically review this Privacy Policy to stay informed about our information practices. We will indicate above the date on which this Privacy Policy was last modified. Your continued use of our Services or Website and participation in PCL Group of Companies (comprising of PCL Direct Ltd, Revolution Communication Ltd & Progressive Consulting Ltd) events constitutes your agreement to the revised Privacy Policy. If you do not agree to the new Privacy Policy, you must discontinue.

#### **15. How to contact us?**

If you have any questions about this Privacy Policy, or if you wish to exercise your rights under applicable data protection laws, please feel free to contact us through our Website or write to us at:

We can be reached via email at [support@pclgroup.co.uk](mailto:support@pclgroup.co.uk)

These timescales are shown in Table 1.

<b>Data Subject Request</b>	<b>Timescale</b>
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	One month
The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
Rights in relation to automated decision making and profiling.	Not specified

*Table 1 - Timescales for data subject requests*

We have implemented the following steps internally to ensure your data is safe:

- Encrypted all hard drives on our devices by upgrading software & operating systems.
- Upgraded our anti-virus
- Produced a policy
- Undertaken in-house training to ensure policy is carried out and systems and processes are followed and uniform.
- Notified all existing customers that we are now compliant.
- Deleted all legacy data that is over 5 years old.