

Cloud Services Privacy Notice

ComputerTalk is committed to protecting your privacy and managing your data in accordance with applicable data protection laws. The *Cloud Services Privacy Notice* applies to Computer Talk Technology Inc. and Computer Talk Global Corp. and covers our processing activities as a data processor. It aims to be clear, concise, and transparent about collecting, storing, and using your data.

Who We Are

ComputerTalk is a company incorporated in Canada, with the principal place of business at 150 Commerce Valley Drive West, Suite 800, Markham, Ontario, Canada, L3T 7Z3. We are a global provider of enterprise-class contact centers and advanced IVR solutions powered by our proprietary ice software platform and application designer tool.

What Data We Collect About You

In connection with the use of cloud services, personal data may be captured by or introduced into the services, the extent of which is determined and controlled by the customer in its sole discretion and which may include, but is not limited to, the following categories of personal data:

- a) First and last name
- b) Title
- c) Position
- d) Employer
- e) Contact information (company, email, phone, physical business address)
- f) ID data
- g) Professional life data
- h) Personal life data
- i) Connection data
- j) Localization data
- k) Contact records for voice, chat, email, or other media channels as directed by the customer
- l) Other categories of data as configured or customized by the data controller

How We Collect Your Data

The customer solution collects the information we process from data subjects who intentionally interact with it or are otherwise made available or introduced into the solution data environment through actions or directions of the customer.

How We Use Your Data and The Legal Basis for Processing

Through a commercial agreement with ComputerTalk for the use of our services, our customers consent to process data pertaining to the customer's employees and the data of their end-user data subjects as specified by and at the sole discretion of each customer. Data subject information is processed and collected strictly for the performance of the contract we enter with each customer and based upon the following legitimate business interests:



- a) **For service management and operation:** The customer authorizes specific employees or agents to access the services by entering information specific to such individuals into the ice administration interface.
- b) **For statistics and reporting:** For the customer's operational management of the services, ice provides various statistical data on contact patterns, including tracking interactions from users or endpoints.
- c) **For service tracking and contact management:** ice provides tools for users to search for previous interactions with the system based on the contact originator or destination, allowing them to follow up on previous interactions.
- d) **For customer-driven archival requirements:** Complete records of contact interactions may be retained and archived for periods specified by the customer to fulfill legal requirements as a legitimate purpose of their business.
- e) **For support and troubleshooting:** Retention of carrier data can be used to troubleshoot voice quality and messaging connectivity issues in the environment. This processing is necessary for facilitating and improving our services.

How We Store Your Data

ComputerTalk securely stores customer data in colocation data centers in Canada and the US, where data is kept securely. Technical and organizational security controls mitigate risks such as loss or unauthorized access, destruction, use, modification, or disclosure of data.

How Long Do We Retain Your Data

We will keep hold of your data for no longer than necessary. The data retention length will depend on any legal obligations we have and the nature of any contracts we have in place with our customers.

On a default basis, voice recordings are archived for 90 days. After 90 days, voice recordings are purged. Contact detail records and email records are retained for one year. For other contact modalities (e.g., webchat), retention of contact records is optional. All retention intervals are configurable. Once the retention period has expired, ComputerTalk follows industry-standard processes for the secure destruction of customer data that becomes obsolete or is no longer required under the agreement.

Within 30 calendar days of termination of services, unless otherwise requested by the customer, all information collected through the provision of services is securely deleted along with all other solution components dedicated to the customer's services, including website(s), configuration data, or other data associated with those services.

Who We Share Your Data With

ComputerTalk will not access or use customer data except as described in the agreement, for the provision of services, or as instructed by the customer. ComputerTalk will not disclose customer data to any government except as necessary to comply with the law or valid and binding order of a law enforcement agency (such as a subpoena or court order).

ComputerTalk may transfer data to its affiliates and hire other companies to provide limited services on its behalf, such as assisting customer support. Any such affiliates and sub-



processors will be permitted to obtain customer data only to deliver the services ComputerTalk has retained them to provide.

Transferring Personal Data

The customer understands that the services provided by ComputerTalk sometimes require customer data to be transferred to a country or territory outside the customer's country or region. The customer agrees to ComputerTalk performing any such transfer of customer data to any such country and storing and processing the customer data to provide the services. The *Standard Contractual Clauses* located [here](#) will apply to customer data transferred outside the EEA, either directly or via onward transfer, to any country not recognized by the European Commission as providing adequate protection for personal data (as described in the applicable privacy legislation).

Your Data Protection Rights

ComputerTalk wants to ensure you are fully aware of your data protection rights. Every user is entitled to the following:

- a) **The right to be informed:** You have the right to know what data is being collected, how it is being used, how long it will be kept, and whether it will be shared with any third parties. We do this through this privacy notice.
- b) **The right of access:** You have the right to request ComputerTalk for copies of your personal data. This is called a subject access request. We must respond to your request within one month.
- c) **The right to rectification:** You have the right to request that ComputerTalk updates any inaccurate or incomplete data.
- d) **The right to erasure:** You have the right to request that ComputerTalk erase your personal data under certain circumstances.
- e) **The right to restrict processing:** You have the right to request that ComputerTalk restricts the processing of your personal data under certain circumstances.
- f) **The right to data portability:** You have the right to request that ComputerTalk transfer the data we have collected to another organization or directly to you under certain conditions.
- g) **The right to object to processing:** You have the right to object to ComputerTalk's processing of your personal data under certain conditions.
- h) **The rights in relation to automated decision-making, including profiling:** You have the right to object to having decisions made about you by automated processes or profiling.

To request to exercise one of the above rights, please get in touch with dataprivacy@computer-talk.com. We will consider and act upon any requests following applicable data protection laws.

Changes to Our Privacy Notice

ComputerTalk keeps the privacy notice under regular review and places any updates on our website. We encourage you to review this privacy notice periodically to learn how ComputerTalk protects your data.

Data Protection Officer



Our Data Protection Officer, Jennifer Sutcliffe, oversees what we do with your information and monitors our compliance with data protection laws.

If you have any concerns or questions about our use of your data, you can contact our Data Protection Officer, Jennifer Sutcliffe, by writing to dataprivacy@computer-talk.com.

How to Contact ComputerTalk

If you have any questions about ComputerTalk's privacy notice, the collection, storage, or processing of your data, or you would like to exercise one of your data protection rights, please do not hesitate to contact us:

Computer Talk Technology Inc.

150 Commerce Valley Drive West, Suite 800

Markham, Ontario, Canada, L3T 7Z3

Telephone: 905-882-5000

Email: dataprivacy@computer-talk.com

How to Contact the Appropriate Authority

Should you wish to report a complaint or feel that ComputerTalk has not addressed your concern sufficiently, you may contact the Information Commissioner's Office.

URL: <https://ico.org.uk/make-a-complaint/>

Telephone: 0303 123 1113