**Customer Privacy Policy**

PiPcall Limited (“we”, “us” or “our”) is a provider of telecommunications services and solutions. We operate the PiPcall website available at: www.pipcall.com (the “Website”) to promote the PiPcall mobile application (the “App”), a desktop application (“Desktop System”), a web portal that allows customer administrators to manage the users, numbers, extensions and licences for their Associated Business (the “PiPcall Portal”), and associated services.

We are committed to protecting and respecting the privacy of those who visit the Website (“you” or “your”). This Privacy Policy sets out the basis on which the personal data collected from you, or that you provide to us, will be processed by us as a result of you visiting the Website, acting as an administrator on behalf of your employer or the organisation that has procured the services (“Associated Business”) or when you otherwise contact us.

Personal data means any information relating to an identified or identifiable individual. Please read the following information carefully to understand what information we collect about you, how we use your personal data and the rights you have. For the purpose of data protection legislation in the UK, we are the controller of personal data.

Please note that use of the App, PiPcall Portal and Desktop System is subject to the End User terms and conditions available here: <https://www.pipcall.com/policies> and the associated privacy policy available here: <https://www.pipcall.com/policies> The use of the App, PiPcall Portal and Desktop System, including personal data collected via the associated services, is not covered by this Privacy Policy. For the purposes of this Privacy Policy, a reference to “Services” means any services offered via the App, PiPcall Portal, Desktop System, or other application provided by us.

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**1. WHAT PERSONAL DATA DO WE COLLECT AND PROCESS, AND HOW DO WE USE IT?**

When you access the Website or otherwise contact us, you may provide us with personal data or we may collect personal data about you. Under data protection law, we can only use your personal data if we have a legal basis for doing so, e.g. where you have given your consent; to comply with our legal and regulatory obligations; for the performance of a contract with you; or for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

When we collect and process such personal data, we do so in accordance with this Privacy Policy and for the following purposes:

Registering your enquiry

You can enquire about the Services we make available to our customers by making an enquiry through the Website, emailing us or contacting us by phone (this includes enquiries relating to a free trial of the Services). If you make an enquiry you will be required to provide us with your first name, surname, email address, company name, address, and telephone number (“Your Details”).

We process Your Details to interact with you and deal with your enquiry as may be required and in order to take any steps at your request prior to entering into a contract with you to receive Services via the App.

Enrolling you in a free trial and/or entering into a contract for Services

If you decide to trial the Services or enter into a contract for the Services, we will process end-user personal data via the App in accordance with the App privacy policy available here: <https://www.pipcall.com/policies>

We will also process Your Details as part of our discussions about the contract for Services and in order to facilitate the contract if your Associated Business decides to procure Services from us.

Sending you marketing and promotional material

If you send us an enquiry through the Website or otherwise contact us, we may process Your Details for the purposes of sending you offers, promotions and information related to our Services.

If you are a prospective customer and have expressed an interest in signing up for our Services by providing us with Your Details, we have a legitimate interest in contacting you for marketing purposes and we will do so in accordance with section 6 below..

If you are an existing customer, we may process Your Details for marketing purposes in accordance with section 6 below, and in such cases, we have a legitimate interest to promote our business and Services to our existing customers who we consider may be interested in finding out about products and services that are similar to our Services. For more information, please see the ‘Marketing and Email Policy’ section below.

Providing you with support

If you send a request for support or help with the Services through the Website, we will process Your Details along with the information you provide to us about your query for the purposes of helping you with your query. We will process Your Details in order to fulfil our contractual obligations to you in providing the necessary support for the Services.

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**2. WHO DO WE SHARE YOUR PERSONAL DATA WITH?**

From time to time, we may need to share your personal data with third parties in the following circumstances:

1. Third party infrastructure providers: your personal data may be held and processed securely by us on the dedicated systems supplied, monitored and maintained by our third party infrastructure providers, such as our website hosting provider;

2. Your employer or the organisation you represent: we may share Your Details with your Associated Business when you make an enquiry about our Services or we otherwise process Your Details as an administrator of the Services; and

3. Regulators or law enforcement agencies: if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, we may share your

personal data with a regulator or law enforcement agency to comply with legal or regulatory requests.

4. Third party service providers: we engage third party service providers to help us run our business, such as external marketing agencies and back office functions like CRM tools.

5. Corporate restructure or sale: In the event that our business goes through a corporate restructure or there are third parties interesting in purchase all or part of our business, we may also need to share some of your personal data with the potential buyers and their advisors. Usually personal data will be anonymised but this is not always possible, however, the recipient will be bound by confidentiality obligations.

6. We use third party payment providers to process payments from our customers for their use of our Services, such as Stripe, GoCardless and Eazipay. We do not receive any financial personal data in order to process payments from our customers and the third party’s processing of your personal data will be dealt with in accordance with the applicable third party’s privacy policy.*‍*

7. Third Party Processors

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

“Digital MarketingService Providers

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information.  Our appointed data processors include:

(i)Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: [http://sopro.io](http://sopro.io/). Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: [dpo@sopro.io](mailto:dpo@sopro.io).”

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**3. TRANSFERS OF YOUR PERSONAL DATA**

We do not transfer your personal data outside of the EU or the UK.

If there are circumstances which would require us to transfer your personal data outside of the EU or the UK, the following will apply. Where applicable, we may look to rely on an adequacy decision of the Information Commissioners Office. Alternatively, in the case of transfers of your personal data outside of the EU or the UK, where the transfers are not to countries that provide an adequate level of protection, we will put in place appropriate safeguards to cover transfers of your personal data including, for example, signing standard contractual clauses/data protection clauses adopted by the Information Commissioners Office.

In the absence of an adequacy decision or appropriate safeguards, we may transfer personal data to a third country or international organisation where an exception applies under relevant data protection law, e.g.:

• you have explicitly consented to the proposed transfer after having been informed of the possible risks;

• the transfer is necessary for the performance of a contract between us or to take pre-contract measures at your request;

• the transfer is necessary for a contract in your interests, between us and another person; or

• the transfer is necessary to establish, exercise or defend legal claims.

We may also transfer information for the purpose of our compelling legitimate interests, so long as those interests are not overridden by your interests, rights and freedoms. Specific conditions apply to such transfers and we will provide relevant information if and when we seek to transfer your personal data on this ground.

If you would like further information, please contact us at support@pipcall.com.

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**4. THE WEBSITE AND THIRD PARTY WEBSITES**

The Website may contain links to third party websites. If you follow a link to a third party website, please note that this Privacy Policy does not apply to those websites. We are not responsible or liable for the privacy policies or practices of any third parties, so please check their policies before you submit any personal data to those websites.

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**5. MARKETING AND EMAIL POLICY**

We may use your personal data to send you updates (by email, text message or telephone) about our services, including exclusive offers, promotions or new services.

We have a legitimate interest in using your personal data for marketing purposes (see above ‘How and why we use your personal data’). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

· contacting us at unsubscribe@pipcall.com; or

· using the ‘unsubscribe’ link in emails or ‘STOP’ number in texts.

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never share or sell it to other third-party organisations for marketing purposes.

The use of non-marketing, transactional emails is integral to the correct operation of the Services. These emails are not promotional in nature and are triggered by interactions with the Services by you, or by other employees of your Associated Business, for example because of the assignment of additional Services to your User. You are not able to opt out of receiving such emails.

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**6. DATA RETENTION**

We store your personal data in line with legal, regulatory, financial and good-practice requirements, and on the following basis:

Your Details are held for up to 12 months except where:

(i) you have entered into a contract to receive our Services from us (including a free trial), in which case we retain Your Details for the duration of our engagement with you and for a reasonable period following expiry or termination of the contract; and

(ii) support request data is held for as long as it takes us to respond to and resolve your support request and then is deleted after a period of 1 year from when your request has been resolved.

When it is no longer necessary to keep your personal data, we will delete or anonymise it.

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**7. ACCESSING YOUR PERSONAL DATA AND YOUR RIGHTS**

As a result of us collecting and processing your personal data, you have the following legal rights:

· to access personal data held about you;

· to request us to make any changes to your personal data if it is inaccurate or incomplete;

· to request your personal data is erased where we do not have a compelling reason to continue to process such data in certain circumstances – for example, we may be required to retain your personal data to comply with our own legal obligations, in which case we may not be able to comply with your request;

· to receive your personal data provided to us as a data controller in a structured, commonly used and machine-readable format where our processing of the data is based on: (i) your consent; (ii) our necessity for performance of a contract to which you are a party to; or (iii) steps taken at your request prior to entering into a contract with us and the processing is carried out by automated means;

· to object to, or restrict, our processing of your personal data in certain circumstances;

· if we use your personal data for direct marketing, you can ask us to stop and we will comply with your request;

· if we use your personal data on the basis of having a legitimate interest, you can object to our use of it for those purposes, giving an explanation of your particular situation, and we will consider your objection;

· to object to, and not be subject to a decision which is based solely on, automated processing (including profiling), which produces legal effects or could significantly affect you; and

· to lodge a complaint with a data protection supervisory body.

To exercise any of your rights set out above, including to withdraw your consent where we have stated we are processing your personal data based on your consent, please contact us at support@pipcall.com or call us on 0330 094 8080.

You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted at https://ico.org.uk/make-a-complaint or telephone: 0303 123 1113.

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**8. CONTACTING US AND CHANGES TO YOUR PERSONAL DATA**

If you have any questions, comments and requests about this Privacy Policy or your personal data, please email us at: support@pipcall.com.

Please notify us by email with any changes to your personal data at any time.

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**9. CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to this Privacy Policy in the future will be posted on https:/www.pipcall.com/policies and where appropriate, notified to you by email.