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| Colt SIP Trunking – Connectivity to PSTN  Data Protection Sheet |

This Data Protection Sheet describes the details of the personal data processing activities derived from Colt Session Initiation Protocol (SIP) Trunking service (the “Service”).

Colt SIP Trunk is a **Voice Service**, a “virtual” phone line. It uses your data circuit (Fiber, Ethernet, DSL etc.) to connect your phone system to the Internet. It can be provided as a standalone service or as a component of a larger solution (e.g. multi-site and IP-VPN scenarios.

Colt SIP Trunking provides highly reliable business-grade service in all countries, offering disaster recovery, fraud management, encryption and voice security over multiple connectivity options, allowing businesses to transition from legacy telephony to Voice over Internet Protocol (VoIP).

The Service is provided directly by Colt as a telecommunications or communication service provider to its customers (“Customers”). A telecommunications or communication service provider is company that transports information electronically through telephony and data communication services in the networking industry. Colt is also an Internet service providers (ISPs).

Data Protection Colt’s Role

For this Service, Colt as a Telecommunication Services Provider considers itself as an independent Data Controller as defined by Article 4 (7) of the GDPR, as it ‘determines the purposes and means of the processing of personal data’.

As a Business to Business (B2B) Telecommunication service provider, Colt processes ‘Business Contact Personal Data of Customer’s personnel’ for the execution of the contract with the Customer from pre-contractual to post-termination stages, to comply with certain legal compliance obligations (tax, etc) including the ones requested as a Telecom Service Provider (legal interception).

Legal basis and purposes of the Personal Data processing

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| Contract Execution | Execution of the contract between Colt and Customer, including pre-contractual commercial relationship (prospect campaigns, marketing), contractual relationship (contracts, Master Service Agreements, General Terms and Conditions, negotiation, signature, order management, invoicing and billing, CRM, product/service provision (installation, delivery, activation, maintenance, troubleshooting, customers portals (e.g. Colt On Line), incident management, quality management) and post-contractual relationship (credits and collection, CRM, marketing) |
| Legal obligation | Legal obligations, such as regulatory, legal interception, accountability, commercial and tax obligations |
| Legitimate Interest | Ensure the security of the network |

Categories of Personal Data processed and type of Personal Data

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| Business contact data (Job title, name, last name, ID number, company phone number, company mobile number, company email, signature). |

Categories of data subjects

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| Colt and Customer’s employees using or managing the Product/Service or the contractual relationship who are natural persons. |

Duration of the Processing

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| Personal data is retained no longer than the minimum time needed to comply with tax and legal obligations and enforce our Service agreements, according to legal, tax and statutory requirements specified under the applicable laws and regulations. |

# Locations where personal data is processed and stored

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| Organizations with authorized access to customer data | Storage location | Access location | Legal Measures (BCRs, DPA, SCC, Privacy Statements, etc) |
| Colt Group | Several countries globally. For EEA services, the personal data is stored in continental Europe and UK. | Several countries globally | European Binding Corporate Rules (BCRs) as Controller and Processor |

Colt used Sub-processors (third party suppliers)

Colt does not use third-party suppliers, different than Other Local Telco Operator providers, when need, to provide the Services.

Legal measures and statements

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| Colt complies with the transparency principle mainly through its publicly available [Data Privacy Statement](https://www.colt.net/legal/data-privacy/). |
| Colt processes as an independent controller of Business Contact Personal Data of Customer’s personnel in compliance with data protection rules and within the terms described in [Colt Compliance Statement](https://www.colt.net/wp-content/uploads/2022/08/DP-compliance-statement-signed.pdf) |
| Colt has embedded the [Privacy by Design and by Default principle](https://www.colt.net/wp-content/uploads/2023/06/Privacy-by-design-statement-signed.pdf), incorporating it into the data processing activities of Colt |
| Colt has been awarded [Binding Corporate Rules (‘BCRs’)](https://www.colt.net/legal/data-privacy/) certification for both controller and processor. Colt's BCR Controller and Processor decisions are published at the [European Data Protection Board (‘EDPB’) website](https://edpb.europa.eu/our-work-tools/accountability-tools/bcr_en) and at the[Spanish Data Protection Authority (‘AEPD’) website.](https://www.aepd.es/es/documento/ti-00003-2021-resolucion-aprobacion-bcr-responsable-colt.pdf) BCRs are a certification granted by the EDPB, the collective body of all European Union (‘EU’) Data Protection Authorities. Through the BCRs, the EDPB certify that the privacy programme implemented by a company is compliant with the GDPR and the same level of data protection compliance valid in Europe is applied all over the entities of the same group. In addition, the BCRs are a tool for safely transfer personal data outside the EU within a group of companies. |

Certifications

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| SL No | **Certification** | **Name** | **Link**  <https://www.colt.net/why-colt/certifications> |
| 1 | ISO/IEC 27001:2013 | Information Security Management |
| 2 | ISO 9001:2015 | International Quality Management System |
| 3 | ISO/IEC 20000-1:2018 | Service Management |
| 4 | ISO/IEC 14001:2015 | Environmental Management |
| 5 | ISO/IEC 22301:2012 | Business Continuity Management |
| 6 | Cyber Essentials | Cyber Essentials |
| 7 | ISO 27701 | An extension of​ ISO/IEC 27001 and ISO/IEC 27002 for Privacy |

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| Other relevant information regarding the Service | For additional information see links to SIP Trunking Datasheet – [EN](https://coltinternal.sharepoint.com/:b:/r/sites/INTRANET/Voice%20Product%20Page/SIP%20Trunking/1%20Sales%20Collateral/Datasheet/EN%20-%20SIP%20Trunking%20-%20Datasheet.pdf?)/ [FR](https://coltinternal.sharepoint.com/:b:/r/sites/INTRANET/Voice%20Product%20Page/SIP%20Trunking/1%20Sales%20Collateral/Datasheet/FR%20-%20SIP%20Trunking%20-%20Datasheet.pdf?)/ [DE](https://coltinternal.sharepoint.com/:b:/r/sites/INTRANET/Voice%20Product%20Page/SIP%20Trunking/1%20Sales%20Collateral/Datasheet/DE%20-%20SIP%20Trunking%20-%20Datasheet.pdf?)/ [IT](https://coltinternal.sharepoint.com/:b:/r/sites/INTRANET/Voice%20Product%20Page/SIP%20Trunking/1%20Sales%20Collateral/Datasheet/IT%20-%20SIP%20Trunking%20-%20Datasheet.pdf?)/ [ES](https://coltinternal.sharepoint.com/:b:/r/sites/INTRANET/Voice%20Product%20Page/SIP%20Trunking/1%20Sales%20Collateral/Datasheet/ES%20-%20SIP%20Trunking%20-%20Datasheet.pdf?)  The detail in this Data Protection Sheet will only have the particularities for SIP Trunking. |