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| LUWARE’S NIMBUS Solution – to Colt Intelligent Communications (CIC)Data Protection Sheet |

This Data Protection Sheet describes the details of the personal data processing activities derived from the Luware’s Nimbus Solution, a licensed cloud service solution native platform built on Microsoft Azure that provides integrated customer service features in Microsoft Teams provided by Luware and available in Colt Intelligent Communications (CIC).

Nimbus is a Luware’s software-as-a-service cloud-native platform built on Microsoft Azure that provides integrated customer service features in Microsoft Teams including advanced call routing, operator consoles, contact centre functionality and compliance recording.

CIC combines productivity and enterprise communication in Microsoft Office 365 with **Colt network and voice services** including, among other elements, Luware’s Nimbus.

Colt provides CIC services 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 Provider (ISP).

Data Protection relationship

Colt provides CIC services as a telecommunications or communication service provider to its customers (“Customers”) and includes in its offer the Luware´s Nimbus solution together with CIC as an additional option.

For any Personal Data processed by Customer and Colt in connection with this Product, such as: (i) contact information of each Parties, (ii) any Personal Data of the signatories of the contracts executed by the parties or Personal Data provided by the Customer and (iii) Colt to execute the Contract and/or provide the Product/Service, i.e. ‘Business Contact Personal Data”, each party is an independent Data Controller and will comply with their respective obligations under the Data Protection Laws.

The Customer is Data Controller of the Personal Data provided to Luware to provide the Luware’s Nimbus Solution. The Customer acknowledges that Luware is acting as a Data Processor for the purposes of providing the Luware’s Nimbus Solution. A specific Data Protection Agreement between Luware and Customer rules such processing activity and relationship.

Data Protection Colt’s Role

As a Business to Business (B2B) Telecommunication service provider, Colt processes ‘Business Contact Personal Data of Customer’s personnel’ as personal Data Controller for the execution of the contract with the Customer for administration purposes, to comply with certain legal compliance obligations (tax, etc.) including the ones requested as a Telecom Service Provider.

Legal basis and purposes of the Personal Data processing

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| Contract Execution | Execution of the contract between Colt and Customer, for administration purposes.  |
| 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) for administration purposes.  |

Categories of data subjects

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| Colt and Customer’s employees contact data for administration purposes.  |

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´s Personal data  | Storage location  | Access location  | Legal Measures (BCRs, DPA, SCC, Privacy Statements, etc) |
| Colt Group  | Several countries globally. Colt servers are located in the UK & EU (Netherland/Frankfurt). | Several countries globally. | European Binding Corporate Rules (BCRs) as Controller and Processor |
| Luware | Depending on the Customer’s location. Luware’s Nimbus hosted in Germany, the UK and Switzerland Microsoft Azure instances. | Depending on the Customer’s location.  | [Privacy Policy | Luware](https://luware.com/en/privacy-policy/)https://luware.com/en/privacy-policy/https://luware.com/en/agreements/dpa/. |

Colt used Sub-processors (third party suppliers)

Colt does not use other third-party suppliers apart from Luware when offering Luware’s Nimbus Solution for CIC.

Luware’s Nimbus Solution for CIC is provided by Luware to Customer embedded as an add on to Colt CIC Product. Luware has implemented a Data Processing Agreement to be executed between the Customer and Luware (https://luware.com/en/agreements/dpa/.).

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.  |
| Colt has achieved ISO 27701:2019, an extension of ISO/IEC 27001 and ISO/IEC 27002 for Privacy and Personal Data. This **Global standard** provides the framework for organizations looking to put in place a system to support compliance with the EU’s GDPR, California’s CCPA, and other data privacy requirements. ISO 27701, also referenced as PIMS (Privacy Information Management System), outlines a framework for [Personally Identifiable Information](https://en.wikipedia.org/wiki/Personally_Identifiable_Information) (PII) Controllers and PII Processors to manage data privacy. |

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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