

1. Who we are

Established in 2011, VENNCOMM (a data processor) are a high-spec, app development company specialising in the Enterprise Mobility Management/MDM space.

Our registered address is:

VENNCOMM
Wells & Associates
10 Lonsdale Gardens
Tunbridge Wells
Kent
TN1 1NU

VENNCOMM's Data Privacy Advisor is Peter Ortiz

If you have any questions about how we process personal data, or would like to exercise your data subject rights, please email us at privacy@venncomm.com

2. Collection of personal data

We collect personal data from you for one or more of the following purposes:

- a. To provide you with information that you have requested or which we think may be relevant to a subject in which you have demonstrated an interest;
- b. To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of services;
- c. To fulfil a contract that we entered into with you or with the entity that you represent;
- d. To manage any communication between you and us.

The table below provides more information about the data we collect for each of these purposes, the lawful basis for doing so and the period for which each type of data will be retained.

In addition, and in order to ensure that each visitor to any of our websites can use and navigate the site effectively, we collect the following:

- a. Technical information, including the Internet Protocol (IP) address used to connect your device to the Internet;
- b. Your browser type and version and time zone settings;
- c. Operating system and platform;
- d. Information about your visit, including the Uniform Resource Location (URL) clickstream to, through, and from our site.

Our cookies policy, which can be viewed from each page on our web site, describes in detail how we use cookies.



3. Lawful basis for the processing of personal data

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. VENNCOMM has processes in place to ensure that only appropriate employees with the correct rights within our organisation can access your data. A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties and where this happens, this is also identified below.

How we collect your information	Data Collected	What we do with your information	Who we share this information with	Retention period	Lawful basis for processing
We may record calls with our customers	Voice recordings that may include; names, business addresses, phone number, location, email address and business sector.	For training and accuracy purposes	Internally only	Up-to 8 years	Contractual Legitimate Interest
We collect information from our customers when they enter competitions and promotions or complete surveys for us	names, business addresses, phone number, location, email address and business sector.	Promotional and marketing purposes	Internally only	1 Year	Consensual
We collect bank account information over the phone or in person when customers purchase VENNCOMM services	Direct debit account details, names, business address, location, email address, phone number.	To fulfil orders	Internally and with third-party payment processing organisations	Maximum of 8 years from the data of performance of contract. 8 Years for VAT records from the performance of the contract	Contractual



We collect information via email when provisioning VENNCOMM services	Names, email addresses, phone numbers, phone type, home country	To provision App users	Internally and with third party telecoms providers, number provisioning organisations, and data compliance service providers	1 year from the termination of contract.	Contractual Consensual (proof of concept)
We may collect some information in the interests of data security	Security information	To protect our services from cyber-attack or other threats and to report any illegal acts	Internally and with third-party information security specialists that may be contracted to investigate.	Relevant statutes of limitation	Legitimate interest
We collect information stored on your mobile device	Phone make, model, operating system	To provide full functionality of the VENNCOMM TALK app and provide analysis for cost efficiencies	Internally only	1 Year from termination of contract	Contractual

4. Storage of personal data

VENNCOMM is a UK-domiciled organisation whose primary offices are in the UK.

- VENNCOMM TALK conferencing services are hosted within the UK and are accessed only by EU-based staff.
- Our cloud document storage provider hosts our data in the UK.
- VENNCOMM is the data controller for all data stored within our cloud service providers.
- Our payment processing services are all based in the UK.
- In partnership, VENNCOMM may provide additional services that are based outside of the EEA. These services have been vetted to ensure that meet the requirements of General Data Protection Regulation and applicable UK law.

5. Security

VENNCOMM's information security management system (ISMS) is certified to ISO/IEC 27001:2013. VENNCOMM is also Cyber Essentials certified.

Although we believe we have appropriate security controls in place to protect personal data, we do not have any control between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your information. We accept no liability in respect to breaches that occur beyond our sphere of control.

6. Your rights as a data subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email privacy@venncomm.com. In order to process your request, we will ask you to provide two valid forms of identification for verification purposes.

In many cases a data subject utilising our services will be employed by an organisation that then contracts the services with VENNCOMM. In these cases the end user (you) are the Data Subject, the organisation is the Data Controller and VENNCOMM is the Data Processor.

When VENNCOMM is acting as a data processor on behalf of an organisation you should direct your request to the data controller. VENNCOMM will then work directly with the data controller to provide you this information.

Your rights are as follows:

The right to be informed

We are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.

The right of access

You may request a copy of personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information.

- a. The purposes of the processing
- b. The categories of personal data concerned
- c. The recipient to whom the personal data has been disclosed
- d. The retention period or envisioned retention period for that personal data
- e. When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean VENNCOMM can refuse to provide the information, VENNCOMM will explain them to you. If requests are frivolous or vexatious, VENNCOMM reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), VENNCOMM will inform you.

The right to rectification

When you believe VENNCOMM hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used in conjunction with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

The right to erasure

Where no overriding legal basis of legitimate reason continues to exist for processing personal data, you may request that VENNCOMM delete your personal data. This includes personal data that may have been unlawfully processed. VENNCOMM will take all reasonable steps to ensure erasure.

The right to data portability

You may request your personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

Your right to object

You have the right to object to our processing of your data where:

- Processing is based on legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing involved automated decision-making and profiling.

7. Contact us

Any comments, questions or suggestions about this privacy policy or our handling of your personal data should be emailed to privacy@venncomm.com

Alternatively, you can contact us at our UK offices:

VENNCOMM Ltd

1 Fore Street

Moor Place

Moorgate

London

EC2Y 9DT

Tel. 03450 582 313



8. Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about the processing of your data, you are entitled to escalate your complaint to a supervisory authority within the European Union. For the UK, this is the Information Commissioner's Office (ICO), who is also our lead supervisory authority. Its contact information can be found at <https://ico.org.uk/global/contact-us>

This policy was last updated on 03/08/2018