



## A Note On 'You'

'You' and 'your' mean the Customer.

## Data Processing Annex

### 1 Subject Matter Of The Processing Of Personal Data

This Data Processing Annex sets out the details regarding how Customer Personal Data is Processed when providing the Services under the Reseller's agreement with BT.

### 2 Duration Of The Processing Of Personal Data

BT or its Sub-Processor will Process the Customer Personal Data for the Service as set out in this Annex for as long as BT provides the Service and for as long as BT may be required to Process the Customer Personal Data in accordance with Applicable Law.

### 3 The Nature And Purpose Of The Processing Of Personal Data

3.1 This is a service that is sold to a Reseller to onward provide to their customers. It provides a intra site corporate telephony service and includes short-form dialling, even where calls are routed across different public networks, or where one call participant has a PSTN or legacy handset and the other has an IP telephony solution.

3.2 BT converts the relevant telephone signals into or from VoIP signals, allowing for transmission over BT and or BT data network infrastructure(s).

3.3 BT processes the PBX rules that apply to each virtual private network to ensure that calls are routed to the appropriate line within and outside of a Customer organisation.

3.4 BT provides billing information to the Reseller and utilises User usage data.

3.5 Due to the nature of the service, personal data across all categories could be processed, e.g.: included within voice mail messages or collaboration session recordings but for these, the BT customer is the Data Controller.

3.6 Telephone regulatory obligations require BT to store address / site information for IP number ranges that BT manages and provides to Resellers. IP to telephone number to site address information is required by emergency and law enforcement services.

### 4 Acknowledgement of the Reseller

4.1 BT, when acting as Data Controller, may collect, process, use or share Customers' Personal Data for the purposes of providing the Service, authenticating Customers on the BT network, billing for services and enabling the Reseller to bill its services to Customers and to comply with legal obligations whose fulfilment is required of BT in its capacity as an authorised telecom operator.

4.2 The Reseller will collect the personal and location data of its Customers necessary for the activation of the Service and guarantees that the information is accurate and will be collected, updated and maintained in accordance with the provisions of EU Regulation 679/2016.

4.3 The Reseller will ensure that it provides Customers with complete and up-to-date information on the processing of personal data, and undertakes to inform Customers about the processing carried out by BT, limited to the purposes set out in this Data Processing Annex.

4.4 The Reseller will be responsible for the conformity and integrity of the information collected for publication in the directories according to Customer's consent.

### 5 Types Of Personal Data and Categories of Data Subjects

5.1 The types of Customer Personal Data Processed by BT or its Sub-Processors, the Reseller or Customer will be:

- 5.1.1 website or IP address;
- 5.1.2 name;
- 5.1.3 address;
- 5.1.4 telephone number;
- 5.1.5 email address;
- 5.1.6 job title;
- 5.1.7 company name;
- 5.1.8 contact records;
- 5.1.9 Call / usage records
- 5.1.10 identity management – user profiles



- 5.1.11 Voice / voice mail recording
- 5.2 The Customer Personal Data will concern the following categories of Data Subjects:
  - 5.2.1 your employees;
  - 5.2.2 your customers or third parties; and
  - 5.2.3 any Data Subject (as controlled by you).