



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 Wifi Roam Service.

2 Duration Of The Processing Of Personal Data

BT or its Sub-Processor will Process the Customer Personal Data for the Wifi Roam Service as set out in this Annex for as long as BT provides the Wifi Roam 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 The nature and purpose of the Processing of Customer Personal Data by BT includes:

- 3.1.1 BT provides a service allowing Mobile Operators' and Wifi Network Operators' subscribers to roam onto Wifi Networks that are BT's partner operators.
- 3.1.2 BT uses Mobile Operators' subscribers numbers for the following purposes: to authenticate onto Wifi Networks; compilation of Service Provider invoices; agreed administrative use in accordance with accepted industry practice and Applicable Laws and regulations which, at the date of this Service Schedule includes, technical purposes, compilation of statistics relating to origin, termination and quality of service; billing, and fraud prevention and detection, to pass telephone numbers to emergency organizations or use CLI to fulfil statutory stipulations or a decision of a government and/or regulatory authority.
- 3.1.3 BT provides a managed platform that Processes basic personal information to enable the services selected by you. BT stores contact information for customers and suppliers to enable billing, report of issues, and network establishment and continuity.
- 3.1.4 The Service generates Transactions detail records recording length and amount of data session per user, origination number, terminating network.
- 3.1.5 The Service uses information from Transactions Details Records for Authentication onto the service, Fraud identification, forecasting purposes, billing and for service quality.
- 3.1.6 The Service has an on-line portal for billing and reporting purposes, and holds personal information relating to Customer CP users for access; and the portal has details of Transaction Detail Records relating to usage of the service per CP for access by that CP only.

4 Types Of Personal Data and Categories of Data Subjects

4.1 The types of Customer Personal Data Processed by BT or its Sub-Processors or you may be

- 4.1.1 name;
- 4.1.2 person record created date;
- 4.1.3 person record cease date;
- 4.1.4 e-mail address(s);
- 4.1.5 postal address;
- 4.1.6 country of residence;
- 4.1.7 phone number;
- 4.1.8 contact number;
- 4.1.9 contact notes from calls;
- 4.1.10 signatures;
- 4.1.11 credit history;
- 4.1.12 personal service identifier;
- 4.1.13 products purchased or subscribed to;
- 4.1.14 contact records;
- 4.1.15 equipment provided;
- 4.1.16 notes/records;



- 4.1.17 correspondence relating to customer care;
- 4.1.18 identifiers provided by devices, applications, tools and protocols;
- 4.1.19 call records;
- 4.1.20 Personal Data traffic and communications records;
- 4.1.21 user ID/login/account;
- 4.1.22 passwords;
- 4.1.23 validation details/shared secret questions;
- 4.1.24 identity management;
- 4.1.25 name of customer;
- 4.1.26 position;
- 4.1.27 job title;
- 4.1.28 type of business organisation;
- 4.1.29 employee identifier;
- 4.1.30 assignment details;
- 4.1.31 work location;
- 4.1.32 identity management (third party individual); and
- 4.1.33 supplier;

This list is not exhaustive as you will specify what Customer Personal Data is Processed.

4.2 The Customer Personal Data may concern the following categories of Data Subjects:

- 4.2.1 your end users; and
- 4.2.2 your employees, directors and contractors.

This list is not exhaustive as you will specify what Customer Personal Data is Processed.