

Contents

1 Introduction.....	2
2 Controller and contact details.....	2
3 How we collect your personal data	3
4 What personal data we collect.....	4
5 What do we use this information for?.....	6
6 Cookies.....	11
7 Who we might share data with	12
8 International transfers of information.....	13
9 How we keep you updated on our services	13
10 Security	13
11 Your rights over your information	14
12 Questions or complaints.....	15
13 How long we keep your information for	15
14 Giving your reviews and sharing your thoughts	15
15 Other links	15
16 Changes.....	15

1. INTRODUCTION

In this notice “Voiceworks” (“we”, “our” or “us”) refers to Voiceworks and our UK affiliate Enconvo UK Ltd. In addition, you may also see references to “Enreach Group”, which includes all other entities globally.

Voiceworks ideates, develops and supplies innovative communication resources for the commercial market. As a result of our service offerings, Voiceworks processes personal data relating to our actual and prospective customers and partners, their staff and end-users, as well as other parties that otherwise interact with us, use our website, or show an interest in our products and services (“you”, “your”).

In this privacy notice, you can read about the personal data we collect, what purposes we use this data for, how we protect your privacy and personal data, how long the data is stored and how you can view and/or correct the personal data we store on you.

Voiceworks does not share personal information with third parties, unless this is (1) legally required, (2) necessary to supply a service, (3) specifically requested by the customer that has provided the personal information or (4) otherwise has a legitimate interest in doing so, measured against the rights, freedoms and expectations of data subjects.

We may provide additional privacy notices or information to you at the time we collect your data. For example, if you apply for a job with us or use the chat bot feature of our website. Such notices will govern how we process the information you provide at that time.

Throughout this document we refer to Data Protection Legislation, which means the Data

Protection Act 2018 (DPA 2018), United Kingdom General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, it also includes the EU General Data Protection Regulation (EU GDPR). This includes any replacement legislation coming into effect from time to time.

2. CONTROLLER AND CONTACT DETAILS

Voiceworks is the controller for the personal information we process as identified in this privacy notice. In some circumstances, Voiceworks will process data on behalf of other organisations (e.g. on behalf of customers or partner organisations with their own purposes for processing the data). In such circumstances, the other organisation will be the controller and so you should refer to their privacy notices for details of how your data is processed.

Occasionally, Voiceworks may be a joint controller with one of our partner organisations. Such processing may be communicated to you in a separate privacy notice.

We are registered with the UK’s supervisory authority, the Information Commissioner’s Office (the ICO) with registration number ZB425834.

Voiceworks sits within the wider Enreach Group, and so while this privacy notice specifically covers the UK entity only, the wider group privacy notice can be found here: https://voiceworks.co.uk/hubfs/voiceworks_website_privacy_policy.pdf.

2.1 Contact information

Business name: Voiceworks UK Ltd

Address: Communications House, Hadley Park, Telford, Shropshire, TF1 6QJ **Phone:** 0333 038 8788

2.2 Data Protection Officer

We have appointed The DPO Centre as our UK Data Protection Officer (DPO) to help us monitor internal compliance, inform, and advise on data protection obligations, and act as a point of contact for you (data subjects) and the ICO.

The UK DPO forms part of the wider Voiceworks Data Protection Team. If you would like to exercise one of your rights, or you have a question or a complaint about this notice or the way your personal information is processed, you can contact the Voiceworks Data Protection Team at:

Email: partner.dataprotection@voiceworks.co.uk

3. HOW WE COLLECT YOUR PERSONAL DATA

We may collect personal information directly from you or indirectly through a third party, depending on your relationship with us. If you choose not to provide personal data to us, you might not be able to make use of the desired service/function or technical assistance.

3.1 For website users or newsletter subscribers

We always inform you about our processing before collecting your personal data: name, e-mail address, company name, postal address and telephone number.

Please note that personal data can be required in order for you to use the features of the website. Additionally, it can be necessary for us to collect and process your personal data in order to provide and optimise our services for you. For example, we need your contact information to be able to book a meeting with you, receive inquiries from you via our contact form or chatbot, or send you a newsletter if you consented to this.

3.2 For end users

The same principles apply to the processing of traffic data and your telephone number when we are delivering our telecommunication offerings.

3.3 For Voiceworks Coligo users

For business end users of the Voiceworks Coligo app our global website contains a separate privacy statement to detail how your data is processed, which equally applies to UK users. The statement can be found here: https://voiceworks.co.uk/hubfs/voiceworks_website_privacy_policy.pdf

3.4 For business customers and partners

Personal data is collected directly from you or indirectly through your employer. In some instances, a third party may provide us with data relating to you (e.g. if we need to carry out a credit check). If you, as a business customer or a partner, provide us with personal data about individuals other than yourself, for example by making our telecommunication solutions

available to your employees, you are obligated to inform your end users about this transfer of personal data to Voiceworks. As an employer or partner, you can meet this obligation by linking to this privacy policy.

3.5 For other parties

We may collect your data directly if you may provide your data to us through your use of our website, via online forms or questionnaires, through phone conversations, by email, in person (at conferences, workshops, seminars or events), and so on. Alternatively, we may collect your data indirectly through approved sales and marketing channels. Whether your data is collected directly or indirectly, we will always provide our privacy information where required under Data Protection Legislation.

4. WHAT PERSONAL DATA WE COLLECT

We only collect personal data that we know we will genuinely use and in accordance with Data Protection Legislation. The type of personal information that we will collect depends on the nature of the relationship that we have with you.

4.1 Personal and User data

Personal data is information that can be linked to an individual. The type of personal data that we will collect depends on the nature of the relationship that we have with you. We may collect the following:

- Business contact information (such as name, job title, employer name, email address, mailing address, phone number).
- Personal or sole trader contact information, in more limited circumstances (such as name, email address, mailing address, phone number).
- Photo ID for verification purposes.
- Payment data (such as bank account details).
- Call recordings.
- We may, in further dealings with you, extend this personal information to include services used, products purchased, subscriptions, records of conversations and agreements and payment transactions.

4.2 Traffic data

When using our services, traffic data will be processed. This data is required for us to facilitate communication. Traffic data is generated and processed automatically when end users make use of our telecommunication services, traffic data consists of: the calling and called numbers, the date, the time, the duration, and the fees that were charged for said call.

This data does not concern the contents of the communication. In the case of a data session, we also register the amount of data, and when roaming, we register the network that was used.

We never store the content of communication unless this forms part of a contractual obligation or instruction from a customer, such as in the case of call recordings.

4.3 Location data

When you set up a call or data session, Voiceworks processes information that can make a very rough determination of your location at that moment. We use this information to determine whether the call or data session is happening in the UK or not.

Voiceworks uses other operators' mobile networks. These operators are able to accurately determine your location by looking at which transmission tower was used for your call or data session. Voiceworks does not have access to this information.

4.4 Website data

Voiceworks.co.uk and our customer portals use cookies to optimise the functionality of certain pages on the website. See Section 6 of this notice for more information.

Voiceworks.co.uk and our customer portal Operator use Google Analytics, Hotjar and Social

Media cookies (such as LinkedIn) to analyse how users make use of the site. For Google Analytics, the information generated by cookies about your visit to the website (including your IP address) is transferred to and stored on servers in the United States by Google. Google uses this information to monitor the way you use the website, compose reports on the website activity for website operators, and offer other services with regard to website activity and internet use.

4.5 Other

When you visit our offices, you will be registered as a visitor. We use this registration for safety purposes, so that we can quickly evacuate the premises in case of a disaster, without leaving anyone behind. We also use camera recordings as a security measure in our offices. We do this to protect our guests, personnel and the building. You will be clearly informed about the presence of cameras when on our premises.

Other information that we may collect that is not specifically listed here but that we will use in accordance with this privacy notice or as otherwise disclosed at the time of collection.

In most instances, you are under no statutory or contractual requirement or obligation to provide us with your personal information; however, we will often require elements of the information above in order to provide our services to you in an efficient and effective manner.

5. WHAT DO WE USE THIS INFORMATION FOR?

5.1 Lawful basis

We only process, store or transfer your personal information when we have a lawful basis for doing so. The lawful basis we rely on to process the information is identified in the table as per 5.2, and will be one of the following:

- Legitimate Interest: processing is necessary for the purposes of our legitimate interests (i.e., our business interests), except where such interests are overridden by your interests or fundamental rights and freedoms.
- Consent: You have given consent to the processing of your personal data for one or more specific purposes.
- Legal obligation: processing is necessary for compliance with our legal obligations.
- Vital interests: processing is necessary in order to protect the vital interests of the data
- Contractual obligation: processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.

5.2 Processing activities

We may use your data to:

Processing activity	Personal Data Category (see section 4)	Lawful basis
Contact you following an enquiry or in reply to any questions, suggestions, issues, or complaints you have contacted us about.	Personal and User data.	Legitimate Interest
Follow up on any interest you have shown in our products and services (e.g. to email you regarding a partially completed webform).	Personal and User data.	Legitimate Interest
Facilitate meeting and quotation requests.	Personal and User data.	Legitimate Interest
Communicate with you and send B2B marketing communications, including where you have attended events or webinars. See also section 9 of this notice.	Personal and User data.	Legitimate Interest or Consent

Communicate with you using our chatbot, processing the information that you have voluntarily provided. We digitally monitor live chat conversations for the purposes of quality control and staff training. Please note this is an Enreach Group product and subject to its own privacy statement here: https://voiceworks.co.uk/hubfs/voiceworks_website_privacy_policy.pdf	Personal and User data; Website data.	Legitimate Interest
Generate marketing/analytics from our website using cookies. This includes the monitoring, development and improvement of the website and your experience. For full details on our use of cookies please see our Cookie Policy.	Website data.	Consent
Manage your online account and provide you access to your billing information	Personal and User data.	Contractual Obligation (when the contract is with you) or Legitimate Interest (when the contract is with the organisation)

		for which you work)
Carry out financial checks (e.g. if you are a company director) should they be required when you or your company purchase our services	Personal and User data.	Legal Obligation or Legitimate Interest
Display the Caller ID. Voiceworks always displays your telephone number to the called number. This means that your number will be visible to the call recipient on the display of their telephone. This can be turned off by calling anonymously. However, we are legally obliged to always reveal your number when you call the national emergency number.	Personal and User data.	Legitimate Interest or Legal Obligation

Conduct security analysis. Based on analyses of call and internet behaviour, Voiceworks can proceed to restrict certain destinations when excessive usage is detected. Higher usage than average call behaviour may indicate fraud. A blockade can limit fraud and misuse, and prevent you from receiving a huge bill for fees that you have not incurred yourself. Voiceworks also uses advanced techniques (such as firewalls, spam filters and virus scanners) to protect against security breaches, viruses, spam and malware.	Personal and User data; Traffic data; Location data.	Legitimate Interest
Provide training and support in the use of our products and services	Personal and User data.	Legitimate Interest
Prevent malicious or annoying contact. If someone is harassing you by telephone or via internet, then you can report this to us and submit a written request to provide information on the person responsible for this malicious or annoying behaviour. If we receive such a request, we will follow internal procedures.	Personal and User data; Traffic data.	Legitimate Interest

Process for traffic management, network planning and quality of services. For the sake of the maintenance and the improvement of our platform, we analyse information about the use of our network. We do this so that we can, among other things, redirect traffic in case of potential overloading, but especially so that we can prevent this by planning and implementing targeted improvements. In addition, we can use the information to see when malfunctions occur on the platform.	Traffic data; Location data.	Legitimate Interest
--	------------------------------	---------------------

Permit number retention and transfer services. Voiceworks offers you the option of keeping your number when you transfer to a different provider. To do this, we exchange information with your current or next provider. In case of a landline, this information is your current telephone number, your name and your address. For a mobile number, your SIM card number, telephone number and name are shared.	Personal and User data.	Contractual Obligation (when the contract is with you) or Legitimate Interest (when the contract is with the organisation for which you work)
Process and facilitate an order you have made with us (e.g. through our website)	Personal and User data.	Contractual Obligation (when the contract is with you) or Legitimate Interest (when the contract is with the organisation for which you work)
Provide and improve services purchased by you or your employer. For example, the delivery of an order to the specified address, or setting up of a telephone call	Personal and User data.	Contractual Obligation (when the contract is with you) or Legitimate Interest (when the contract is with the organisation for which you work)

Manage invoices and payments. For example, an invoice may show the fees charged for each service, specified by type of use. You can see fees incurred abroad, call costs, data usage and more.	Personal and User data.	Contractual Obligation (when the contract is with you) or Legitimate Interest (when the contract is with the organisation for which you work)
--	-------------------------	---

<p>To store certain information from customers for a specific time period for the purposes of legal investigations and to cooperate with requests for personal information from competent authorities or other authorised governmental institutions, as well as with requests for information we process and store as part of our normal business operations.</p> <p>For example information from your telephone records or about your data usage. When the storage period has elapsed, stored information is destroyed or made anonymous. Another example of a legal requirement is the calling of the national emergency number. When you do this, your telephone number and the location of your telephone can be transmitted to the relevant authorities, even when you have blocked the display of your telephone number.</p>	<p>Potentially any data items from section 4 should there be a legal need.</p>	<p>Legal Obligation</p>
<p>Other operational or legal purposes</p>		
<p>Negotiate and/or enter into and/or fulfil a contract with you, or the organisation for which you work.</p>	<p>Personal and/or User data.</p>	<p>Contractual Obligation (when the contract is with you) or Legitimate Interest (when the contract is with the organisation for which you work)</p>
<p>Fulfil pre-contractual steps, such as supplier questionnaires, as part of our onboarding process.</p>	<p>Personal and/or User data.</p>	
<p>Comply with applicable laws, lawful requests, and legal process, where appropriate/necessary.</p>	<p>Potentially any data items from section 4 should there be a legal need.</p>	<p>Legal Obligation</p>
<p>Comply with regulatory monitoring and reporting obligations, where appropriate/necessary.</p>	<p>Potentially any data items from section 4 should there be a legal need.</p>	

Digitally monitor and/or record calls between you and us for the purposes of quality control and staff training. You will be informed of this prior to the call.	Personal and/or User data.	Legitimate Interest
As part of professional services provided to us by lawyers, bankers, auditors, and insurers, where necessary.	Personal and/or User data.	Legitimate Interest or Legal Obligation
Meet our high security standards in managing your personal data, our systems and our website.	Potentially any data items from section 4 should there be a legal need.	Legitimate Interest
Share your data with healthcare professionals if you are taken ill or involved in an accident while visiting our office or sites, and are unable to provide your consent.	Personal and/or User data; Other data.	Vital Interest

5.3 Sensitive information

In our capacity as a controller, we do not actively collect ‘special category data’ for any of the purposes described in this notice. If for whatever reason we need to collect such data, you will be informed at the time of collection and it will only be done so with your explicit consent or in line with other lawful purposes under Data Protection Legislation.

5.4 Anonymous information

We may create anonymous, aggregated, or de-identified data from your personal information and other individuals whose personal information we collect. We do this by excluding information that makes the data personally identifiable to you.

6. COOKIES

6.1 Information about our use of cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. You can set your cookie preference when you first visit our site based on your own preferences by selecting the ‘Manage Cookies’ option on our cookie banner.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer’s hard drive.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission.

This site may use different types of cookies. Some cookies may be placed by third party services that appear on our pages.

If we ask for your consent for cookies then this applies to the following domain:

www.Voiceworks.co.uk

6.2 Types of cookie

We classify cookies as either, necessary, preference-based, statistical, or marketing based. Descriptions of what each of these cookie classifications mean and the cookies that we use which come under each of these headings is available through our cookie banner, prior to you providing your consent or adjusting your cookie settings.

Our cookie banner also provides information about the purposes for each cookie we use and the duration they are used for.

6.3 Updating your cookie settings

When you visit our website for the first time, you will be presented with a cookie banner, which asks for your consent for the placement of non-necessary cookies or otherwise allows you to adjust your cookie settings.

Please note, if you use your browser settings to block all cookies (including necessary cookies) you may not be able to access all or parts of our site.

If you require further information, please contact us by using the contact details provided above.

Once you have interacted with our cookie banner, you can change your cookie preferences at any time by visiting our home page and by clicking on the icon in the bottom left-hand corner of the screen.

7. WHO WE MIGHT SHARE DATA WITH

We may share your personal data with trusted third-party organisations as follows:

- In certain circumstances, for example due to legislation, it may be necessary to pass on information to the authorities or directory inquiries databases. Disclosure may also take place if necessary to establish or defend legal claims.
- As part of our group wide activities we may share aggregated data about our customers in the form of business intelligence and statistics with members of the Enreach Group.
- In order to provide telephony to our business customers, it is necessary for us to transmit traffic data via operators. Voiceworks uses several infrastructure providers and these operators therefore process personal data on our behalf. These operators are independently data controllers for the processing of data within their respective networks.
- We might also pass on your personal information to data processors acting as suppliers for us, e.g. for sending out newsletters and website maintenance, for data storage and analytics; technology support and services (email, web hosting, marketing, and advertising providers, etc.).

We only share your data with data processors that can provide sufficient guarantees that they will process your data securely and in accordance with Data Protection Legislation. Our data processors cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us or further sub-processors which must process your personal data to the same high standards.

- With partners with whom we jointly process your data.

- With professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.
- With government or law enforcement officials or private parties as required by law and disclose and use such information as we believe necessary or appropriate.

8. INTERNATIONAL TRANSFERS OF INFORMATION

Most third parties that we engage with are based in the UK. Should we need to transfer your personal information outside of the UK to countries not deemed by the ICO to provide an adequate level of personal information protection, the transfer will be based on safeguards that allow us to conduct the transfer in accordance with the Data Protection Legislation, such as the specific contracts approved by the ICO providing adequate protection of personal information.

We may share personal data between Voiceworks and other entities within the Enreach Group internationally. We do this based on group wide agreements, where we have mapped the transfers and designated the responsibility for compliance with Data Protection Legislation, amongst members. Transfers between the UK and the majority of

Enreach Group members are deemed adequate by the European Commission and the ICO. Where this is not the case, the aforementioned group-wide agreements will contain appropriate safeguards to permit the transfer. For more information regarding these transfers please contact us using the details above.

9. HOW WE KEEP YOU UPDATED ON OUR SERVICES

As a business contact, we will send you relevant news about our services in a number of ways including by email, but only if we have a legitimate interest to do so. Marketing communications will be sent from our own domain.

Each email communication will have an option to object to the processing, if you wish to amend your marketing preferences, you can do so by following the link in the email and updating your preferences.

We make every effort to ensure that we only send such communications to those acting in a business capacity and do not send such materials to consumers via personal email addresses if it is clear they are not acting in such a capacity.

An exception to this will be where you have provided your consent to be contacted specifically. In such cases, you can withdraw this consent by contacting us using the details provided in this notice.

10. SECURITY

Data security is of great importance to Voiceworks and to protect your data we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including:

- Limiting access to our buildings to those that we have determined are entitled to be there (by use of passes, key card access and other related technologies).

- Implementing access controls to our information technology.
- We use appropriate procedures and technical security measures (including strict encryption and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps, offices, and stores.

11. YOUR RIGHTS OVER YOUR INFORMATION

Under the UK GDPR, you have a number of rights regarding our processing of your data. To exercise these rights, please contact our Data Privacy Team using the contact details above. We may ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information.

11.1 The right to be informed about our collection and use of personal data

You have the right to be informed about the collection and use of your personal data. We ensure we uphold this right with our internal data protection policies and through this and other privacy notices. These are regularly reviewed and updated to ensure these are accurate and reflect our data processing activities.

11.2 Right to access your personal information

You have the right to access the personal information that we hold about you by making a request. This is referred to as a 'Data Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), for noncomplex requests, we will provide it to you or them within one month from when your identity has been confirmed.

11.3 Right to rectify your personal information

If any of the personal information we hold about you is inaccurate, incomplete, or out of date, you may ask us to correct it.

11.4 Right to object or restrict our processing of your data

You have the right to object to us processing your personal information for particular purposes or have its processing restricted in certain circumstances.

11.5 Right to erasure

You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

11.6 Right to portability

The right to portability gives you the right to receive personal data you have provided to a controller in a structured, commonly used, and machine-readable format. It also gives you the right to request that a controller transmits this data directly to another controller.

An automated decision is one that is made by our systems rather than a person. Under Data Protection Legislation, you have the right to express your concerns and object to a decision taken by purely automated means. You also have a right to request that a person review that decision.

11.7 Rights in relation to automated processing

This right is unlikely to apply to Voiceworks's use of your data, as any automated processing we carry out is unlikely to make decisions and would include human intervention. If you would like to discuss this in further detail, please contact us as set out above.

12. QUESTIONS OR COMPLAINTS

The ICO regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/for-the-public>.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first (using the contact details above). Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

13. HOW LONG WE KEEP YOUR INFORMATION FOR

We will retain your personal information in order to provide you with a high-quality service, in accordance with Data Protection Legislation and for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you).

14. GIVING YOUR REVIEWS AND SHARING YOUR THOUGHTS

When using our websites, you may be able to share information through social networks like Facebook and Twitter, or review platforms such as Trustpilot. For example, when you 'like', 'share' or review our services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts, so you are comfortable with how your information is used and shared on them.

15. OTHER LINKS

Please be aware that the website may link to other websites that may be accessed by you. We are not responsible for the data policies, content or security of such sites. We do not have any control over any use of your data by third parties when you visit such sites or otherwise provide your data through these channels.

16. CHANGES

Voiceworks reserves the right to modify or amend this notice at any time. The effective date will be displayed below the statement. It is the user's responsibility to check this document regularly for changes.

Thank you for taking the time to read our privacy notice.
May 2025.