



# GDPR Data Processing Statement



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## Document Control

### Document Overview

Classification:	Public
Document Details:	GDPR Data Processing Statement
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Last Reviewed by:	Chief Operating Officer
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### Document Approval

The Chief Operating Officer shall review this policy annually and shall determine whether any further changes need to be made prior to approval. Initial release and significant changes require approval from the board.

This Policy was approved by Andy Mackey, Chief Operating Officer on 24<sup>th</sup> February 2025 and is issued on a version-controlled basis under his signature.

### Document History

Date of Change	Summary of Change	New Version Number	Changes to be notified to:
24/02/25	Formal review and update with COO	V2.0	COO
08/05/25	Revision of classification	V3.0	COO
16/05/25	Update to reflect recording and transcription of calls	V4.0	COO



## GDPR Data Processing Statement

Description	Details
Subject matter of the processing	The provision of services by the Supplier to the Customer as outlined in any Order and/or associated documentation.
Duration of the processing	For the period of time from the commencement date to the expiry date of any contracted subscription period entered into by the customer.
Nature and purposes of the processing	Processing activities, such as storage, data transfer, and the monitoring, recording, and automatic transcription of telephone calls, will be undertaken by the Supplier. Personal Data will be processed to provide the services to the Customer as outlined in an Order and/or associated documentation, in accordance with applicable data protection legislation.
Type of Personal Data	Types of Personal Data as may be supplied by the Customer, including name, address, email address, phone numbers, National Insurance Number, Bank Details, and any personal data that may be disclosed during monitored, recorded, and automatically transcribed telephone calls.
Categories of Data Subject	Data subjects include the Customer's representatives and personnel, such as employees, contractors and collaborators and other categories of data subjects as may be supplied by the Customer.
Is any of the data processed shared with third parties?	Personal Data will only be shared with third parties where necessary for the provision of the contracted services – for example, Pension Funds, HMRC, or service providers involved in the processing of data such as call monitoring, recording, and transcription services – and always in accordance with applicable data protection legislation.
Is any processing carried out outside of the EU?	No
Plan for return and destruction of the data once the processing is complete UNLESS requirement under union or member state law to preserve that type of data	<p>On the expiration or termination of any agreement with the Customer, unless required to retain data for legal or statutory reasons, we shall promptly:</p> <ul style="list-style-type: none"><li>• return the data and any other property, information, and documents, including confidential information, relating to the agreement, which was supplied by the Customer, and/or</li><li>• destroy all electronic or hard copies we made of the data and any other property, information, and documents (including any confidential information), including any call recordings and/or transcriptions generated in the course of providing the services under the agreement.</li></ul>

**End**