



Better Communication for Work

Euphoria Telecom (Pty) Ltd

Privacy Notice, v1.1

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General

This Privacy Policy Notice applies both to information collected through our website and to information collected offline.

What is personal information?

We define as Personal Information (PI) any information that identifies or relates specifically to you, such as your identification number, your email address, your name or contact details.

When do we collect information from you?

We collect information, including personal information, from you when you:

- submit information by completing a form in our web-site (e.g. to register, apply for a job or to request a quote from us)
- email us information in order to place an order with Euphoria
- communicate with our employees in order to obtain services from our company (e.g. resolve issues)
- use our PBX system (i.e. place or receive a call)

What information do we collect from you?

When you use our euphoria.co.za website we may collect your information, such as:

- your records information on our server logs from your browser or mobile platform, including your location, IP address, cookie information, and the page you requested. This data is treated as non-personal information, except if we are compelled to do otherwise by law or a legal authority
- your name and contact information, including email address and company details which you may submit to us when you request a quote
- your name, contact details, ID number and whatever other information you submit to us via your CV as part of a job application

When you apply for our services (via the web-site or via email) we may collect information related to performing background checks and creating your account, such as:

- your name, identification information and contact details
- copies of director ID and company registration documents
- telephone number you want to port

When you use our PBX system (including the Telephone Management System web application):

- your records information on our server logs from your browser or mobile platform, including your location, IP address and all actions
- we process a Call Detail Record (CDR) which contains information about the call. Depending on the type of the call (inbound, outbound, between two extensions, etc) the CDR contains different types of information such as the call source and destination, date, time, call duration, etc. The CDRs are used to produce various reports, including your billing reports
- (optional) we create and process a .wav file with the actual recording

When you call us or we call you:

- we may intercept (record calls) and monitor your communications to the extent permissible by law. Our sole intention of doing so is to ensure the quality of the service we give you and for disclosure purposes.
- we update the information we have on your account profile based on the information you provide

In all cases, the requested information is necessary for us to provide you with service. We review our collection processes to ensure the information we collect is not excessive.

Cookies

We use first party cookies. Those are cookies that are set by our website and can only be read by our website. They are used for the functionality of the website (e.g. allowing our Website to recognise that you have visited it before).

Our website uses Google cookies (third party cookies); i.e. cookies set by Google services or software, such as analytics, maps, online videos, advertising and remarketing or social networking features. Google uses cookies on your browser to store your options such as user preferences, information of google maps, preferred zoom level, website statistics, etc. These cookies may get re-read during a visit on other sites if they do business with Google as well (e.g. YouTube). Any data collected will be used in accordance with our own privacy policy and Google's privacy policy.

What do we use your information for?

Any of the information we collect from you may be used in one of the following ways:

Sales and Administration

- To enter into a contract with you
- To support our legitimate interests in managing our business (or those of a third party) provided such interests are not overridden by your interests and rights
- To create your account
- To recommend a solution that optimally addresses your needs
- To recover debts or trace those who owe us money

Product and Support

- To provide you with the PBX services you have requested
- To allow you administer your account and your PBX installation
- To bill you in accordance to your use of our system
- To prevent and detect fraud, information security and privacy incidents and other crimes
- To notify you about problems, important changes or developments in the services you receive
- To respond to your inquiries / complaints
- To process your requests in relation to your information

Operations and Marketing

- For internal record keeping
- To evaluate our services with the purpose of improving our services
- To inform you of other products we potentially offer
- To advertise our business by exhibiting our clients (only if you have provided us with permission to do so)
- To do research and statistical analysis to understand how you use our network, products and services and enable Euphoria to improve those

Human Resources

- For evaluating candidates for positions within the company

We use your information in-line with the reason you submitted it to us. For instance, CV related information will only be used to process job applications and for no other reason.

How do we protect your information?

We have implemented an Information Security Framework and are putting in place a variety of security measures to maintain the safety of the personal information that is processed by Euphoria.

Shared Responsibility Model

Privacy, just as security, of the Euphoria system is a shared responsibility between Euphoria and the customer. Euphoria is responsible for providing a secure communications tool and the customer is responsible for using it securely.

In short, Euphoria has put controls in place to secure the customers information while it is stored and transferred in the Euphoria PBX environment. The customer's responsibility lies with ensuring that access to the Euphoria PBX system is controlled and that the customer conforms with the legal requirements in South Africa in obtaining and storing information in the Euphoria system.

Third party access to your information

We use third parties to enable our service to you (telecommunications lines, hosting services, data storage, companies that provide us with technical support, etc.). We implement security controls to ensure your information cannot be accessed by our third party providers (encryption of information, access controls, etc.).

We review the Terms and Conditions and the Service Level Agreements of our third parties to ensure your information cannot be processed in a manner that is not according to the requirements of the South African Protection of Personal Information Act (PoPIA).

We may disclose your information to professional advisers, judicial, regulatory and law enforcement bodies as and when required.

With the exception of the cases mentioned above, none of your information is not shared with any other company for any reason whatsoever, unless we first obtain your explicit consent.

What if you refuse to submit the requested information?

Providing your personal information to Euphoria is voluntary.

Should you not provide the information we request, we may not be able to provide you with our services.

Where relevant, consent clauses are included in our forms, including opt-in/opt-out for using your customer logo and name for advertising purposes.

Should you provide us with the personal information of third party, it is your responsibility to inform the third party that you disclose their details to Euphoria and notify them of this Privacy Notice.

What is the lifecycle of your information

Customer information

The information you provide in order to enter into a contract with us is stored into our systems for the period of our relationship. Should our contract be cancelled, we retain the information we require as per section "How long do we retain your information".

Call recordings

An overview of the call recording lifecycle is provided in the "Euphoria Telecom (Pty) Ltd - Call Recording Lifecycle" document. Contact us for a latest copy of the document.

How long do we retain your information

For historical reasons, we keep the following client information:

- information provided to create your account and set up your PBX installation
- tax or accounting related information: invoices and Call Detail Records (CDRs)

for an unlimited time. However, we only store and we do not process that information after your services have been terminated; unless we need to use it in dealing with complaints, legal challenges or prospective litigation.

You are responsible to define the retention periods for your call recordings based on your business needs and your legal and regulatory compliance requirements. The Euphoria system gives our clients this functionality.

Transborder Data Transfers

Euphoria uses cloud services to provide an economical, secure and scalable product. Many of our services are hosted outside South Africa. However, we review the Terms and Conditions of our service providers to ensure that the level of protection of your information is in line with the information security requirements imposed by the South African law.

Data subject's rights to access and correct their personal information

You may request details of personal information which we hold about you under the Promotion of Access to Information Act (PAIA), 2 of 2000 and the amendments imposed by the Protection of Personal Information Act (PoPIA), 4 of 2013.

Confirmation of whether or not we hold personal information about you may be requested free of charge by calling our Support line or emailing us. The fees to obtain a copy or a description of personal information held about you are prescribed in terms of the PAIA Act. If you would like to obtain a copy of your personal information held by Euphoria, please review our Promotion of Access to Information Act Manual located at our website.

Please note that you have a right to object to the processing of your personal information where that processing is carried out for our legitimate interests.

You may withdraw your consent to our contacting you for direct marketing at any time.

Terms and Conditions

The privacy policy is complementary to and should be read and understood together with our Terms and Conditions.

The Terms and Conditions establish the use, disclaimers, and limitations of liability governing the use of all our services.

Changes to our Privacy Policy

If we decide to change our privacy policy, we will post those changes on this page. We will only notify you by means of a prominent notice on the Website prior to the change becoming effective only if we make material changes to this policy notice.

Your Consent

By using our website or otherwise contacting us, you consent to the contents of this notice.

You may withdraw your consent at any stage and give us adequate time to remove you from our systems.

Contact details

You should direct any queries on our privacy policy notice to our Information Security Officer:

Eirini Kalimeri

eirini@euphoria.co.za

010 593 4500

or write to us:

PO Box 12429, Mill Street, Cape Town, 8010