

## Privacy Policy

**Effective Date: [26/09/24]**

### 1. Introduction

Akixi Limited ("we," "us," or "our") are committed to protecting your privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our call recording and transcription services. By using our services, you agree to the terms of this Privacy Policy. To provide the call recording and transcription services we use a third party called Jiminny ("Service Provider", "they"). For the purpose and use of the Jiminny platform we will be deemed as the "data controller", whereas Jiminny will be deemed as the "data processor".

### 2. Information We Collect

We collect the following types of information:

- **Call Recordings:** We collect and store audio recordings of your calls. These recordings may include personal information, such as names, phone numbers, and any other information shared during the call.
- **Images:** We may collect and store video images of your calls.
- **Transcriptions:** We collect and store text transcriptions of your calls, which may also include personal and sensitive information shared during the call.
- **Metadata:** We may collect metadata related to your calls, such as the time, date, duration of the call, and the phone numbers involved.
- **Usage Data:** We may collect information about how you interact with our services, including IP addresses, browser types, and pages visited.
- **Profile information:** your name, position, company, team, telephone number, email address.
- **content you provide through communicating with us:** for example information personal or otherwise that you voluntarily share with us. We would request you be mindful of information that you disclose, we would encourage you not to share or disclose information that you may consider sensitive.

### 3. How We Use Your Information

We use the information we collect for the following purposes:

- **Call recordings:** To accurately transcribe and/or record the content of calls.
- **Service Improvement:** To improve our service offerings, customer experience, quality assurance, training, analyse usage patterns and to provide historical information to refer to in the event of dispute or information recall.
- **Legal Compliance:** To comply with legal obligations and respond to legal requests.

#### 4. Disclosure of Your Information

We may share your information in the following circumstances:

- **Service Providers:** We use our Service Provider to provide the call recording and/or call transcript service recording and will share your information with our Service Provider and their subsequent third-party partners, who as a collective will assist us in providing our services, such as recording, transcription tools, storage providers, or data analytics. We will also store your call transcriptions on our HubSpot platform.
- **Legal Obligations:** We may disclose your information if required to do so by law or in response to valid legal processes.

#### 5. Data Security

We implement appropriate technical and organisational measures to protect your personal information from unauthorised access, disclosure, alteration, or destruction. We have also obtained assurances from our Service Provider that they also implement sufficient security measures to protect your personal information. However, no method of transmission over the internet or electronic storage is completely secure, so we cannot guarantee absolute security.

#### 6. Data Retention

We retain your information for as long as necessary to fulfil the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. Transcriptions are typically retained for the duration of the agreement we have with you and then deleted. Call recordings are retained for 2 years unless otherwise requested through executing your rights detailed in section 7 below.

#### 7. Your Rights

You have the following rights concerning your personal information:

- **Access:** You may request access to the personal information we hold about you including copies of transcriptions and recordings.
- **Correction:** You may request that we correct or update any inaccuracies in your personal information.
- **Deletion:** You may request that we delete your personal information, subject to certain legal or contractual restrictions.
- **Objection:** You may object to our processing of your personal information in certain circumstances.

To exercise these rights, please contact us using the information provided below or contact the organiser of the meeting before, during or after the meeting.

#### 8. Lawfulness of processing

Our lawful basis for processing is defined below under the UK GDPR legislation:

**Akixi use Article 6(a) Consent:** by partaking and contributing to the call you are providing consent for a transcription and or recording of the call to be processed.

However, you will be made fully aware that the call is being recorded and/or

transcribed by a verbal notification by the organiser of the meeting. Furthermore, there will be a visual notification on the call itself and a written notification on invites.

Akixi use Article 6(f) legitimate interest: To improve our services to you we will use the recording and transcriptions taken for the purpose identified in section 3 of this privacy notice.

At any time before, during or after the recording and/or transcription is taken, you may exercise your rights set out in section 7 of this privacy policy. You are free, with no duress, to request that no recording is made prior to the meeting, we will ensure your rights and freedoms are respected.

### **9. International Data Transfers**

Information held on the Service Providers platform is on servers located in the EU and are subject to GDPR legislation. Should our Service Provider require onward transfer of personal data, they are compliant with the EU-US Data Privacy Framework and the UK extension to the EU-US Data Privacy Framework. Additionally, information will be stored on our HubSpot platform with the servers located in the USA, HubSpot have adhered to the EU-US and UK extension of the Data Privacy Framework which provides a lawful mechanism to allow the transfer of personal data from the EU/UK to the USA under article 45 of the GDPR.

### **10. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our website. You are encouraged to review this Privacy Policy periodically for any updates or changes.

### **11. Contact Us**

If you have any questions or concerns about this Privacy Statement or our data practices, please contact us at:

Akixi Limited

Akixi, Churchill Court, 3 Manor Royal, Crawley RH10 9LU

Email: [operations@akixi.com](mailto:operations@akixi.com)

Telephone number: +44(0)1293 853060

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). You can contact the ICO as follows:

By phone: 0303 123 1113

By post: Information Commissioner's Office, Wycliffe House Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom.

We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.