

## Privacy Policy: Oak Call Recordings

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**Classification: Public**

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### 1. Introduction

Akixi Limited ("we," "us," or "our") are committed to protecting privacy. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our Teams call recording services. By using our Teams call recording services, you agree to the terms of this Privacy Policy. To provide the call recording services we use a supplier, Oak Innovation Limited ("Service Provider", "they"). For the purpose and use of the Oak Innovation platform Akixi will be deemed as the "Processor", whereas Oak Innovation will be deemed as the "Sub Processor". You as the "customer" or your "client" will be deemed as the "Controller" or "Processor" depending on your agreements in place.

### 2. Information We Collect

We collect the following types of information:

- **Call Recordings:** We collect and store audio and video 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.
- **Metadata:** We may collect metadata related to the calls, such as the time, date, duration of the call, and the phone numbers involved.
- **Usage Data:** We may collect information about interactions with our services, including IP addresses, browser types, and pages visited.
- **Profile information:** names, position, company, team, telephone number, email address may be collected.
- **Content provided through communicating on the recordings:** for example, information personal or otherwise that may be voluntarily shared. We would request you or your clients be mindful of information that is disclosed.

### 3. How We Use Your Information

We use the information we collect for the following purposes:

- **Call recordings:** To accurately record the content of calls.
- **Service Improvement:** To improve 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 service 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, storage providers, data analytics and support.
- **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.

#### 7. Your Rights

You have the following rights concerning your personal information:

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

To exercise these rights, please contact us using the information provided in section 11.

#### 8. Lawfulness of processing

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

**Akixi use Article 6(b) Contractual necessity:** Processing is necessary for the performance of a contract to which we are providing you, as a service, under contract.

#### 9. International Data Transfers

Information held on the Service Providers platform are on servers located in the EU and are subject to GDPR legislation. Should our Service Provider require onward transfer of personal data, they will ensure that they are compliant with the EU-US Data Privacy Framework and the UK extension to the EU-US Data Privacy Framework or sufficient measures are in place to make the transfer lawful 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: [dpo@akixi.com](mailto:dpo@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.