

## AKIXI PRIVACY NOTICE

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AK-ISMS-014  
Classification: Public

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## Privacy Notice

### Introduction

Welcome to Akixi's Privacy Notice.

Akixi respects your privacy and is committed to protecting your Personal Data. This privacy notice tells you how we look after your Personal Data and tells you about your privacy rights and how the law protects you.

This privacy notice is organised into multiple sections so you can click-through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

Our Privacy Notice should be read in conjunction with our Terms Of Service, which is available at <https://www.akixi.com/terms-of-service/>. We do occasionally update this policy so please do return and review this policy from time to time.

This Privacy Policy is organised into multiple sections so you can click-through to the specific areas set out below:

- 1. IMPORTANT INFORMATION AND WHO WE ARE**
- 2. THE DATA WE COLLECT ABOUT YOU**
- 3. HOW IS YOUR PERSONAL DATA COLLECTED?**
- 4. HOW WE USE YOUR PERSONAL DATA**
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- 6. INTERNATIONAL TRANSFERS**
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## 1. IMPORTANT INFORMATION AND WHO WE ARE

### Purpose Of This Privacy Notice

This privacy notice aims to give you information on how Akixi collects and processes your Personal Data.

We do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your Personal Data.

### Data Protection Legislation

Data Protection Legislation as used and applied in this Privacy Policy means and is governed by the Data Protection Act 1998 and UK General Data Protection Regulation (UK-GDPR) and any national implementing laws, regulations and secondary legislation until there is any successor legislation to the UK-GDPR or the Data Protection Act 1998.

### Brexit

The new and amended Data Protection Act 2018 (DPA2018) took effect on January 31, 2020. The DPA2018 will no longer rely on the EU GDPR, but on the UK-GDPR instead. It will instead refer to the new domestic GDPR after Brexit, this privacy policy aligns to UK-GDPR requirements but also respect the requirements of the EU-GDPR.

### Processor

Akixi Limited is the Processor and responsible for your Personal Data (collectively referred to as Akixi, Akixi Group, Akixi group of companies, "we", "us" or "our" in this privacy notice).

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

#### Contact Details

Our full details are:

- Full name of legal entity: Akixi Limited
- E-mail address: DPO@akixi.com
- Online form: <https://wkf.ms/3W85WH8>
- Postal address: Akixi, 2 Commerce Road, Lynch Wood, Peterborough, PE2 6LR, United Kingdom
- 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 e-mail: Please complete the form at [Make a complaint | ICO](#)
- 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.

#### Changes To The Privacy Notice And Your Duty To Inform Us Of Changes

This version was last updated on 10th January 2023.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

#### Third-Party Links

Our resources, services, and documentation collateral may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third-parties to collect or share data about you. We do not control these third-party resources and are not responsible for their privacy statements. We encourage you to read the privacy notice of every third-party website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

*Personal Data*, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- *Identity Data* includes first & last name, maiden name, username or similar identifier, password credentials, marital status, title, and gender.
- *Contact Data* includes billing address, delivery address, e-mail address and telephone numbers.
- *Financial Data* includes bank account and payment card details.
- *Transaction Data* includes details about payments to you or from you, and other details of products and services these payments relate to.
- *Technical Data* includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites.
- *Usage Data* includes information about how you use our websites, products and services.
- *Marketing & Communications Data* includes your preferences in receiving marketing from us and our third-parties and your communication preferences.
- *Active Akixi Service Data* is defined as your organisation's telephony reporting environment configuration such as Devices, ACD Agents, and User credentials. Additionally, it includes [Historic Call Activity Data](#), as well as [Historic ACD & DND Activity Data](#) and [Historic Admin Actions data](#) collected over your organisation's subscription period for Akixi's reporting services. For environments using the omni-channel e-mail ACD distribution feature, active Akixi Service data also contains e-mail messaging platform integration details as well as [Historic E-mail Activity Data](#) for all previously distributed e-mail messages that have been completed (i.e. responded to).

For environments using the omni-channel chat ACD distribution feature, active Akixi Service data also contains chat platform integration details as well as [Historic Chat Activity Data](#) for all monitored chat sessions that have been completed.

- *Historic Call Activity Data* is defined as completed or ended voice call activity data collected over your organisation's subscription period for Akixi's reporting services. This data includes calling telephone number, unique call identifier, called telephone number, originating ACD Agents & extension, called ACD Agent & device, answering agent & device, call start time, answer time, end time, and termination reason.
- *Historic [ACD](#) & [DND](#) Activity Data* is defined as a history of [ACD](#) & [DND](#) state changes that occurred over your organisation's subscription period for Akixi's reporting services. This includes agent sign-in time, [ACD](#) state change type, ACD state change time, extension number, and ACD Agent. Please refer to sub-heading "Telephony Terminology" within the Glossary for a definition of [ACD](#) & [DND](#).
- *Historic E-mail Activity Data* is defined as the e-mail message activity for all previously distributed e-mail messages that have been completed (i.e. responded to), and which occurred over your organisation's subscription period for Akixi's reporting services. This data includes originating e-mail address, number/extension of omni-channel ACD hunt group, e-mail handling/responding agent & device, forwarded-to e-mail address (if applicable), e-mail received time, e-mail handling/responding time, end/response time, and the word count of the originally received message body content. Note that the message history does not include the original multi-part message body text, nor any attachments.
- *Live E-mail Activity Data*: For environments using the omni-channel e-mail ACD distribution feature, Live Akixi E-mail Activity Data is defined as the message details for all queuing e-mails as well as e-mails currently being responded to by ACD agents. This includes the originating e-mail address, number/extension of omni-channel ACD hunt group, the handling/responding agent & device, forwarded-to e-mail address (if applicable), e-mail received time, e-mail handling/responding time, end/response time, the word count of the originally received message body content, and also the original multi-part message body text itself including all attachments. Once e-mail messages are fully completed & replied to by ACD agents, and the response is sent back to the originating e-mail address, then the live e-mail details are completely deleted including all original message body content in addition to the response written by the corresponding agent. Historic E-mail Activity Data excluding any message body content is then immediately created from the live e-mail data just prior to removal.
- *Historic Chat Activity Data* is defined as completed or ended chat activity data collected over your organisation's subscription period for Akixi's reporting services. This data includes originating e-mail address (if provided by the originating external party), number/extension of omni-channel ACD hunt group, chat platform ID of omni-channel ACD hunt group, chat handling agent and device, chat start time, answer time, end time, and termination reason.
- *Telephony Platform Integration Data* is defined as the internet protocol (IP) address(es) and/or DNS (domain name system) address(es) of your organisation's telephony platform, the telephony platform's access credentials, and the enterprise and/or site identifiers used by the telephony platform in order to identify & label your organisation's entire telephony environment. For Customers subscribing to Dubber call recording services, Telephony Platform Integration Data also includes: the Customer's account name on the Dubber recording platform itself; the Dubber access account user e-mail address(es), and; the API access credentials of the corresponding Dubber account (i.e. API user name & password).
- *E-mail Messaging Platform Integration Data*: For environments using the omni-channel e-mail ACD distribution feature, e-mail messaging platform integration details are required which are the associated e-mail account access credentials as well as the associated e-mail address identifiers.
- *Chat Platform Integration Data*: For environments using the omni-channel chat ACD distribution feature, chat platform integration details are required, which are an OAuth 2.0 refresh token (as generated through the OAuth authorization code grant flow, stored using 128-bit encryption), the group IDs of chat platform groups, and the user IDs of chat platform agent accounts.
- *Historic Admin Actions Data*: This is an "audit log" that records configuration changes and other actions that Application Users with administrator permissions make to the settings and Akixi data entities via the Akixi Service administration portal pages. It also records login times for all

Application Users. The only Personal identity data stored is the corresponding user's Username value.

We also collect, use and share *Aggregated Data* such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Data but is not considered Personal Data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### If You Fail To Provide Personal Data

Where we need to collect Personal Data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct Interactions

You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, e-mail or otherwise. This includes Personal Data provided when you:

- Make an enquiry to us regarding our products or services;
- Respond to us as part of our Supplier selection or on-boarding process.
- Subscribe to our services, publications, and/or communications;
- Request marketing and promotional material(s) to be sent to you; or
- Give us some feedback.

- Automated Technologies Or Interactions

As you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server-side logging and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookie Policy under sub-section "Cookies" for further details.

For Customers subscribing to Akixi's reporting services, that organisation's call, [ACD](#), and other telephony activity will automatically be recorded.

- Third-Parties Or Publicly Available Sources

We may receive Personal Data about you from various third-parties and public sources as set out below:

- Technical Data from the following parties:
  - i. Analytics providers such as Google LLC based inside and outside the EEA (*European Economic Area*);
  - ii. Search information providers such as Google LLC based inside and outside the EEA.
- Identity and Contact Data from publicly available sources such as United Kingdom's Companies House based inside the EEA and The Credit Safe Group based inside & outside the EEA.

### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third-party) and your interests and fundamental rights do not override those interests.

- Where we need to comply with a legal or regulatory obligation.

Refer to sub-section “Purposes For Which We Will Use Your Personal Data” to find out more about the types of lawful basis that we will rely on to process your Personal Data.

Generally we do not rely on consent as a legal basis for processing your Personal Data other than in relation to sending direct marketing communications to you via e-mail, text message, or a postal delivery service. You have the right to withdraw consent to marketing at any time by contacting us at the following e-mail address: [marketing@akixi.com](mailto:marketing@akixi.com)

#### Purposes For Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose / Activity	Type Of Data	Lawful Basis For Processing Including Basis Of Legitimate Interest
To register you as a new Akixi telephony reporting End User.	a) Identity. b) Contact. c) Telephony environment configuration. d) <a href="#">Telephony platform integration details.</a> e) <a href="#">E-mail Messaging Platform Integration Data.</a> f) <a href="#">Chat Platform Integration Data.</a> g) <a href="#">Active Akixi Service Data</a> (also including h, i, j, l below). h) <a href="#">Historic Call Activity Data.</a> i) <a href="#">Historic ACD &amp; DND Activity Data.</a> j) <a href="#">Historic E-mail Activity Data.</a> k) <a href="#">Live E-mail Activity Data.</a> l) <a href="#">Historic Chat Activity Data.</a> m) Usage including <a href="#">Historic Admin Actions Data.</a>	Performance of a contract with you or your Telephony Services Provider.
To register you as a new Akixi Channel Partner (i.e. Aggregator and/or Reseller of our Akixi telephony reporting service).	a) Identity. b) Contact. c) Telephony environment configuration. d) <a href="#">Telephony platform integration details.</a> e) <a href="#">E-mail Messaging Platform Integration Data.</a> f) <a href="#">Chat Platform Integration Data.</a> g) <a href="#">Active Akixi Service Data</a> (also including h, i, j, l below). h) <a href="#">Historic Call Activity Data.</a> i) <a href="#">Historic ACD &amp; DND Activity Data.</a> j) <a href="#">Historic E-mail Activity Data.</a> k) <a href="#">Live E-mail Activity Data.</a> l) <a href="#">Historic Chat Activity Data.</a> m) Usage including <a href="#">Historic Admin Actions Data.</a>	Performance of a contract with you.
To respond to and engage in correspondence with you.	a) Identity. b) Contact.	Performance of a contract with you.
To process and deliver your order including:	a) Identity. b) Contact. c) Financial. d) Transactional.	<ul style="list-style-type: none"> <li>• Performance of a contract with you.</li> <li>• Necessary for our legitimate interests (to recover debts due to us).</li> </ul>

<ul style="list-style-type: none"> <li>• Manage payments, fees and charges;</li> <li>• Collect and recover money owed to us.</li> </ul>		
<p>To manage our relationship with you which may include:</p> <ul style="list-style-type: none"> <li>• Notifying you about changes to our terms or Privacy Notice.</li> <li>• Asking you to leave a review or take a survey.</li> <li>• To make suggestions and recommendations to you about goods or services that may be of interest to you.</li> </ul>	<ul style="list-style-type: none"> <li>a) Identity.</li> <li>b) Contact.</li> <li>c) Profile.</li> <li>d) Marketing and communications.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you (a, b, c).</li> <li>• Necessary to comply with a legal obligation (a, b, c).</li> <li>• Necessary for our legitimate interests to keep our records updated and to study how Customers use our products/services (a, b, c, d).</li> <li>• Consent (d).</li> </ul>
<p>To administer and protect our business and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<ul style="list-style-type: none"> <li>a) Identity.</li> <li>b) Contact.</li> <li>c) Technical.</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise).</li> <li>• Necessary to comply with a legal obligation.</li> </ul>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.</p>	<ul style="list-style-type: none"> <li>a) Identity.</li> <li>b) Contact.</li> <li>c) Profile.</li> <li>d) Usage.</li> <li>e) Marketing and communications.</li> <li>f) Technical.</li> </ul>	<p>Necessary for our legitimate interests (to study how Customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).</p>
<p>To use data analytics to improve our website, products/services, marketing, Customer relationships and experiences.</p>	<ul style="list-style-type: none"> <li>a) Technical.</li> <li>b) Usage.</li> </ul>	<p>Necessary for our legitimate interests (to define types of Customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).</p>

### Marketing

We aim to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising.

### Third-Party Marketing

We will get your express opt-in consent before we share your Personal Data with any company outside the Akixi group of companies for their own marketing purposes.

### Opting-Out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or by contacting us at any time at the following e-mail address: [marketing@akixi.com](mailto:marketing@akixi.com)

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### Cookies

We have a separate cookie policy which you can find at <https://www.akixi.com/cookie-policy/>.

### Change Of Purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your Personal Data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- a) Internal Third-Parties as set out under sub-section "Internal Third-Parties".
- b) External Third-Parties as set out under sub-section "External Third-Parties".
- c) Third-parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy notice.

We require all third-parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL TRANSFERS

We operate internationally including in some locations and/or with third-parties based outside of the UK or EEA. Whenever we transfer your Personal Data out of the UK or EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the ICO in the UK. For further details, see [International transfers | ICO](#)
- There is an adequacy agreement in place for un-restricted data transfers to and from the UK and the EEA.

7. Where we use certain service providers, we may use specific contracts approved by the UK Information Commissioners Office or European Commission which give Personal Data the same protection it has in the UK and Europe.
8. Where we use providers based in the US, we may transfer data to them if they agree and sign an International Data Transfer addendum to the EU commission Standard Contractual Clauses (SCC). This signed contract allows for un-restricted data transfers between Akixi and US third parties and provides assurances by the third party in the US that there are compatible provisions in place to safeguard personal data aligned with the requirements of UK GDPR.
9. Where Personal Data is transferred to the US, by default such transfers will be conducted in compliance with applicable data protection laws and the EU-US Data Privacy Framework (and, where applicable, the UK Extension and Swiss-US Data Privacy Framework). This will ensure a level of protection for personal data that is at least equivalent to that required under applicable data protection legislation.

Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data out of the UK or EEA.

## 10. DATA SECURITY

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third-parties who have a genuine business-related reason for doing so. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 11. DATA RETENTION

### How Long Will You Use My Personal Data For?

We will only retain your Personal Data 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 Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our Customers (including Contact, Identity, Financial and Transaction Data) for 7 years after they cease being Customers for tax purposes.

In some circumstances you can ask us to delete your data: see sub-heading “Request Erasure” for further information.

In some circumstances we may anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 12. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. Please click on the links below to find out more about these rights:

- [Request access to your Personal Data.](#)
- [Request correction of your Personal Data.](#)
- [Request erasure of your Personal Data.](#)
- [Object to processing of your Personal Data.](#)
- [Request restriction of processing your Personal Data.](#)
- [Request transfer of your Personal Data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please contact us using the details under sub-heading “Contact Details”.

### No Fee Usually Required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### Time Limit To Respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 13. ADDENDUM REGARDING MERGER AND ACQUISITION OF MONDAGO BY AKIXI IN 2024

Akixi and Mondago will only share marketing and sales activities, information and data, with each other. We will use your business or professional or commercial personal information, which may include name, email, phone number or contact details for the purpose to market and sell products and services to both businesses commercial contacts, the purpose of processing is defined below:

- a) To inform you of product and services that may be of interest to you.
- b) To inform you of changes and developments that may be of interest to you.

Akixi and Mondago will only share your professional personal information with each other, which may include name, email, phone number or contact details for the purpose of fulfilling our contractual obligation to you this may include:

- a) Processing of financial transactions
- b) Delivering support services

c) Provisioning and delivery of services

Our Lawful basis of processing is defined below under the UK GDPR legislation:

a) Article 6(f) Legitimate interest: as notified in this addendum

b) Article 6(b) Contract: as notified in this addendum

You have the right to request to withdraw from us processing your information if you so wish to exercise this right, please contact us using the contact details section in this privacy policy.

## 14. SMS MESSAGING

- By providing your mobile number, you consent to receive SMS messages from Akixi Limited for service-related and support communications.
- Message frequency varies depending on your interaction with Akixi Limited and the services you request.
- Message and data rates may apply.
- You may opt out of receiving SMS messages at any time by replying STOP. After you send STOP, you will no longer receive SMS messages from Akixi Limited unless you re-subscribe.
- Akixi Limited will not share, sell, rent, or disclose mobile opt-in data or SMS consent information to third parties for marketing or promotional purposes.
- **Mobile opt-in information is used solely to provide customer support and service-related communications.**

## 15. GLOSSARY

### 15.1. Lawful Basis

- *Legitimate Interest* means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us
- *Performance of Contract* means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- *Comply with a legal or regulatory obligation* means processing your Personal Data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- *Consent* means where you voluntarily opt-in and give your agreement & permission to receive marketing communications from us.

### 15.2. Third-Parties

#### Internal Third-Parties

Other companies in the Akixi Group acting as joint processors and who are based inside and/or outside the EEA, providing IT, system administration, software development, and visual design services.

#### External Third-Parties

- Service providers acting as processors based inside or outside the UK or EEA, who provide billing, invoicing, IT, system administration, software development, and visual design services.

- Application providers such as HubSpot, Monday.com, etc. acting as processors based inside or outside the UK or EEA, who provide data storage, data management, and/or marketing communicating services.
- Data centre & cloud computing platform providers such as Amazon Web Services Inc, based inside or outside the UK or EEA.
- Billing and invoicing providers based inside or outside the UK or EEA.
- Professional advisers acting as joint processors including lawyers, bankers, auditors and insurers based inside or outside the UK or EEA who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors based in the United Kingdom or outside the EEA, who require reporting of processing activities in certain circumstances.
- A full list of processors can be found on our Data processing agreement (DPA) found under : [Trust Hub | Akixi](#)

### 15.3. Telephony Terminology

- *ACD* means an Automatic Call Distributor, which is a telephony platform function that distributes incoming calls to a specific group of people commonly called *ACD Agents*.
- *DND* means Do-Not-Disturb, which is a telephony platform function that allows phone extension users to designate their device or phone account as being either available or unavailable to take inbound calls.

## 16. YOUR LEGAL RIGHTS

You have the rights to:

### Request Access

Request access to your Personal Data (commonly known as a “data subject access request”). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

### Request Correction

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

### Request Erasure

Request erasure of your Personal Data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

### Object To Processing

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third-party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

### Request Restriction Of Processing

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

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#### Request The Transfer

Request the transfer of your Personal Data to you or to a third-party. We will provide to you, or a third-party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

#### Withdraw Consent At Any Time

Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.