



SECURE MT LTD

Privacy statement

1 Introduction

- 1.1 This Privacy Policy (together with our terms of use and any other documents referred to in it) explains what we do with your personal data, whether we are in the process of providing you with a service, assisting you with your enquiry or dealing with a formal enquiry from a regulator.
- 1.2 It describes how we collect, use and process personal data, and how, in doing so, we comply with our legal obligations.
- 1.3 We respect your privacy and are committed to protecting it through our compliance with applicable privacy and data protection laws and regulations. Please read this privacy policy carefully to understand our policies and practices regarding your personal data and how we treat it. By using SMT's services, you are accepting the practices described in this privacy policy.
- 1.4 If you do not want your information to be processed as set out in this privacy policy, please do not provide any personal data to us and do not use our services.
- 1.5 It is important to note that we may amend this Privacy Policy from time to time. We review our Privacy Policy on an annual basis, sooner if changes to regulation require or if we change the way we process personal information. If you have any questions about our privacy practices, please refer to the contact details at the end of this privacy policy.
- 1.6 SMT Limited is a company registered in England and Wales with Company No 10428033 ("SMT", "we", "us" or "our"). Our registered office is at Cotswold House, 219 Marsh Wall, London E14 9FJ.
- 1.8 For the purposes of the UK Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679) ("GDPR"), in respect of the SMT Services, we are the data controller. We are responsible for the processing of any personal data you provide to us whilst using our services. SMT Limited is registered with the UK Information Commissioner's Office under Registration No. **ZA650226**.

2 When This Privacy Policy Applies

- 2.1 This Privacy Policy applies to personal information that we collect whilst you are using SMT Services and in any email and other communication between you and us.
- 2.2 It does not apply to information collected by any other website or web-based service operated by us (or our group companies), any website operated by a third party including any third party application or content (including advertising) that may link to or be accessible from SMT Services.
- 2.3 Please check the privacy policies of any external site before submitting any personal data to them, as we cannot accept any responsibility or liability in relation to them.

3 Why does SMT Limited need to collect and store personal data?

- 3.1 We collect information in order to provide services to our customers and to comply with legal and regulatory requirements, including those of the Phone Paid Services Authority, OFCOM, the FSA, and others.

4 Personal Data we collect and how we collect it

- 4.1 In order for us to provide our services to you we need to collect limited personal data from you to perform the services. We cannot perform the services without the personal data associated with the individual services. In any event, we are committed to ensuring that the information we collect and use is kept to a minimum, is appropriate for this purpose and does not constitute an invasion of your privacy
- 4.2 Data collected to perform due diligence on our customers. This data is stored until our contract with the customers has expired or longer if required by regulation.
 - Passport Information
 - Driving licence information
 - Address
 - Phone number
 - Email address
 - Bank details

4.3 Data we collect directly as appropriate to your use of our customer's services

DATA	Source
Calling Line identities	You
Call recording	Service (not all calls are recorded, only those where there is a legal requirement for us to do so).

4.4 Data collected automatically

4.5 When you access our web based services, we may also receive information automatically which relates to your computer, mobile device and internet connection, whether you decide to use our services or not. This includes your internet protocol address ("IP address"), your country of location, operating system, browser and platform type and access times. These are not actively utilised by the service and are only present in log files for regulation, technical operations and maintenance purposes. In order to comply with regulation this data is currently held for two years. In certain circumstances Regulatory bodies may instruct us to store data beyond our normal retention timescales.

4.5.2 Our website uses cookies which are small files of letters and numbers that we put on your computer. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also helps us to improve our website. We use analytical cookies which enable us to recognise and count the number of visitors and to see how visitors move around our website. This helps us to improve the way our website works.

We currently use the following types of cookies.

Cookie	Purpose	Type
PHP Session Cookie	Allows a user to be recognised within a website visit so that changes or data selection is remembered from page to page.	Session Cookie
Google Analytics	We use Google Analytics cookies which allows Google Inc. to collect information about how visitors use our site. We then use this information to help us improve our site. The Google privacy policy is located at: https://www.google.co.uk/policies/privacy You can find out how to opt out of Google Analytics by visiting https://tools.google.com/dlpage/gaoptout	Persistent Cookie Various Durations (max 2 Years)

- 4.5.3 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.
- 4.5.4 Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org.

5 Consent

- 5.1 By consenting to this privacy policy, you are giving us permission to process your personal data specifically for the purposes identified. If you do not want your information to be processed as set out in this privacy policy, please **do not** use our services.
- 5.2 The bases for SMT's collection, processing and storing of personal data are:
- To perform a contract
 - Legal obligation
 - Legitimate interests

6 Will SMT share my personal data with anyone else?

We may pass your personal data on to our customers contracted to SMT in the course of providing our services to them. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide to you. When they no longer need your data to fulfil this service, they will dispose of the details in line with SMT's procedures.

- 6.1 We may disclose your personal data if we are required to do so by law, any applicable regulation or to protect the rights, property, or safety of ourselves or others.
- 6.2 SMT will not pass on your personal data to any other third parties.

7 How will SMT use the personal data it collects about me?

- 7.1 SMT will process (collect, store and use) the information you provide in a manner compatible with the UK Data Protection Act 2018 and the GDPR. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. SMT is required to retain information in accordance with the law, such as information needed for audit purposes and regulatory requirements. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices.

8 How long will SMT keep the personal data it collects about me?

- 8.1 SMT Limited will process personal data only for the time required to provide the services and except as noted above once this is complete we will store the personal data for a period of two years in order to provide customer service, maintain an audit trail and comply with our legal and regulatory requirements. In certain circumstances Regulatory bodies may instruct us to store data beyond our normal retention timescales

9 Under what circumstances will SMT Limited contact me?

- 9.1 SMT will not normally contact you once your service has been provided. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

10 Your Rights as a Data Subject

- 10.1 At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our systems.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that SMT refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

- 10.2 If you would like to exercise any of these rights, details of how to contact our Data Protection Unit can be found at the end of this policy. In order to assist you with exercising these rights we will first need to confirm your identity.

11 How to Complain

- 11.1 SMT takes complaints very seriously and will respond to complaints within 30 days, this allows us time to investigate your complaint thoroughly. In the event that you wish to make a complaint about how your personal information is used by us please contact our Data Protection Unit.

How to Contact our Data Protection Unit

The Data Protection
Unit SMT Limited
Cotswold House
219 Marsh Wall
London
E14 9FJ

Email: gdpr@telecom2.net

- 11.2 If you are not satisfied with our response or believe we are not processing your personal data in accordance with UK Data Protection Act 2018 and the requirements of the GDPR you may complain directly to the UK Supervisory Authority.

How to Contact the UK Supervisory Authority

Customer Contact
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
United Kingdom

Email: casework@ico.org.uk

Web: www.ico.org.uk

Helpline: 0303 123 1113