



INTERROUTE ONE BRIDGE PRIVACY POLICY



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1 PRIVACY POLICY

1.1. This Privacy Policy covers the following:

- Who we are
- What information do we collect?
- How do we use your information?
- Who may use your information?
- Third party links and services
- How do we protect your information?
- Where is your information processed?
- Marketing Communications
- How long do we keep your information?
- Your rights
- How do you contact us?

1.2. We take your privacy seriously and this Privacy Policy sets out how we go about this. This policy applies to all of the personal data we collect about you in the provision of the Interoute One Bridge service – a voice and video communication service providing voice and video conferencing calls, instant messaging, content sharing and call recording.

1.3. By providing information to us, you expressly agree to this Privacy Policy.

1.4. You also agree to bring this Privacy Policy to the attention of all recipients of the Interoute One Bridge service including your employees and their contacts.

1.5. We ask you to display this Privacy Policy in all meeting invitations

1.6. We may occasionally amend this Privacy Policy. Any new policy will automatically be in force when it is published on the website. You should therefore return here regularly to view our most up to date Privacy Policy. You should also print a copy for your records.

1.7. We do not knowingly collect or process data from anyone under the age of thirteen (13) years old

2 WHO ARE WE?

2.1. The Interoute One Bridge service is provided by Interoute Communications Limited (Interoute). Interoute is incorporated in the UK (Company Number 04472687; address 31st Floor, 25 Canada Square, Canary Wharf, London, England, E14 5LQ). We refer to Interoute, together with its group companies, as “we”, “us” or “our” in this Privacy Policy.

2.2. You can find details of all of our group companies by visiting www.interoute.com.

3 WHAT INFORMATION DO WE COLLECT?

3.1. Most of the information we collect is information provided directly by you. This may include:

- contact information - information such as name, job title, company name, department, e-mail address, device URI and telephone number;
- professional information - such as your job description;
- transaction information - your contact information, financial or other payment information

3.2. We may also collect and process other information that is not directly provided by you including:

- end user data and traffic data, for example your user ID and password;
- your IP address, domain, location and device details such as hardware make and model, operating system version, unique device identifier;
- user generated content, for example audio data, video data, instant messaging data, content generated during call recording and data processed for troubleshooting purposes.

3.3. Finally, we may use publicly accessible information to verify information we are provided with and to manage and expand our business.

4 HOW DO WE USE YOUR INFORMATION?

4.1. We use information collected about you as outlined in this Privacy Policy.

4.2. Our primary purpose in collecting your personal data is to provide you with the services you requested. We may use your personal data for the following purposes:

- to provide the information, services or support you may request and related after-sales services;
- to identify you, and to contact you from time to time with product or service updates;
- to send other messages that are useful to the service we provide;
- to manage our relationship with you and to carry out any related administration;
- to provide personalised, targeted, or location-based content, services, and advertising from us and third parties;
- to promote our services, or the services of our partners, including by email and via social media platforms;
- to compare information for accuracy, and verify it with third parties;

- to detect, investigate and prevent activity we think may be potentially illegal, unlawful or harmful and to enforce our Privacy Policy and/or our terms of business or any other purpose referenced herein or therein;
- to carry out research, including market research, statistical research on traffic data, sales and other commercial information to assist us in improving the services we provide to you to tailor the services and for usage reporting;
- to enable the call recording feature to work and in order to troubleshoot the service

5 WHO MAY USE YOUR INFORMATION?

- 5.1. We may disclose your personal data to enforce our policies, to comply with our legal obligations or in the interests of security, public interest or law enforcement in any country where we have entities or affiliates. For example, we may respond to a request by a law enforcement agency or regulatory or governmental authority. We may also disclose data in connection with actual or proposed litigation, or to protect our property, security, people and other rights or interests.
- 5.2. We share your information with third parties who help deliver our products and services to you. Examples include hosting our web servers, analysing data, providing marketing assistance, and providing customer service. These companies will have access to your personal information as necessary to perform their functions, but they may not use that data for any other purpose.
- 5.3. We may also share your personal data:
- with companies in our group and/or our affiliates; or
 - with any third party you have asked us to share your personal data with such as LinkedIn or any other social media site if you have asked us to connect with your account.
- 5.4. If we or any part of our group is sold, or some of its assets transferred to a third party, your personal information, as a valuable asset, may also be transferred to the acquirer, even if they are not in the same line of business as us. Our customer database could be sold separately from the rest of the business, in whole or in a number of parts. Potential purchasers and their advisors may have limited access to data as part of the sale process. However, use of your personal information will remain subject to this Privacy Policy.
- 5.5. Similarly, your personal information may be passed on to a successor in interest in the unlikely event of a liquidation, bankruptcy or administration.

6 THIRD PARTY LINKS AND SERVICES

- 6.1. We are not responsible for the privacy practices or the content of third party websites. Therefore, please read carefully any privacy policies on third party links or websites before either agreeing to their terms or using those websites.
- 6.2. Note that, despite the measures taken by us and the third parties we engage, the internet is not secure. As a result others may nevertheless unlawfully intercept or access private transmissions or data.

7 HOW DO WE PROTECT YOUR INFORMATION?

- 7.1. We take what we consider to be appropriate technical and organisational measures to guard against unauthorised or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data. While no system is completely secure, we believe the measures implemented reduce our vulnerability to security problems to a level appropriate to the type of data involved. We have security measures in place to protect your data, however, it remains your responsibility:
- where you have a user account :
 - o to log off or exit when you no longer need access or if you take a break;
 - o to ensure no-one else gains access while your device is logged on (including by logging on to your device through a mobile, Wi-Fi or shared access connection you are using);
 - o to keep your password or other access information secret. Your password and log in details are personal to you and should not be given to anyone else or used to provide shared access for example over a network. You should use a password which is unique to your use of our applications - do not use the same password as you use for another site or email account; and
 - to maintain good internet security. For example if your email account or Facebook account is compromised this could allow access to your account with us if you have given us those details and/or permitted access through those accounts. If your email account is compromised it could be used to ask us to reset a password and gain access to your account with us. You should keep all of your account details secure. If you think that any of your accounts has been compromised you should change your account credentials with us, and in particular make sure any compromised account does not allow access to your account with us. You should also tell us as soon as you can so that we can try to help you keep your account secure and if necessary warn anyone else who could be affected. You may not transfer your account to anyone without our prior written consent.

8 WHERE IS YOUR INFORMATION PROCESSED?

- 8.1. We might transfer your personal information to places outside of your home country, for example to companies in our group that are based outside the EEA. If you are in the European Economic Area (EEA) this means that your data may be transferred from the EEA to another country and stored there, where we (or our suppliers) might process it. If that happens, we require our suppliers and our staff to apply equivalent security standards as when we process your information in the EEA.

9 MARKETING COMMUNICATIONS

- 9.1 If you have given permission, we may contact you by mail, telephone, SMS, text/picture/video message, and email about products, services, promotions, special offers that may be of interest to you. If you prefer not to receive any direct marketing communications from us, you can opt out at any time. See further 'Your rights', below.

10 HOW LONG DO WE KEEP YOUR INFORMATION?

- 10.1. We will retain your personal data only as long as is necessary for the purposes set out in this Privacy Policy, or as is required by applicable law, and then we will delete it.

11 YOUR RIGHTS

- 11.1. In some countries you may have the right to see the information we hold on you. If you wish to inquire about this service then please direct your queries to Global.Data.Protection@interoute.com. We may charge a small fee for this service where that is permitted by local law.
- 11.2. In some countries you may have a right to change or request the deletion of information we hold about you. This could include changing your contact details or your payment details or cancelling your account. If you wish to do this, please send the details of your request to Global.Data.Protection@interoute.com.
- 11.3. If you wish to exercise your right to unsubscribe from email marketing communications, you can use the link at the bottom of any communications received from us. This will automatically suppress your email address from receiving future email marketing communications from our systems unless you choose to opt back in.

If you wish to exercise your right to be removed from our telemarketing list, please let the caller know at the time of calling and they will make sure your number is suppressed unless you opt back in.

11.4. For communications via the internet, we are unable to control how the data is transmitted.

12 HOW DO YOU CONTACT US?

12.1. If you have any questions about this Privacy Policy we encourage you to contact us at Global.Data.Protection@interoute.com