

ProVu Communications Ltd
Privacy Policy

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1. Introduction

ProVu Communications is committed to protecting and respecting the privacy of visitors to our website, our customers, suppliers and our customers' end users. We also understand that our reputation will be built on your trust as we work on your behalf. This policy sets out the basis on which any personal data we collect from you, or that you provide to us will be processed.

This Privacy Policy applies to all the products, services and web tools offered by ProVu Communications Ltd except where otherwise noted.

2. Information we hold

In this section we give details on the following:

- Information we collect
- How we use the information we collect
- Who we share this information with
- How long we hold the data for

We hold data for as long as there is a contractual need or legitimate interest. For sensitive data we have specific policies which are listed below.

2.1. Information about our Customers' and Suppliers' Employees

2.1.1. Contact Information

We collect information about employees of our customers and suppliers (potential or existing). Information can include names, contact numbers, email addresses, job titles and company information. Information is stored and used for one or more of the following reasons:

- For fulfilment and record of sales contracts.
- To give notifications of orders, despatches, invoices and account statements.
- To give users access to our online portal for pricing and ordering.
- For communication about products or services we offer based on a customer's enquiry or Vendor lead.
- To share marketing information with subscribers.
- We hold contact information about our suppliers and potential suppliers so that we are able to make contact should we want to enquire or purchase products or services.

Where we have been notified that an individual no longer works for an organisation, we will update our records. When this happens, the contact's telephone number and email address will automatically be deleted from our database after 90 days. We continue to hold the contact's name as a historical record and for any existing sales contracts.

2.1.2. Credit Card Information

We allow our customers to pay for their orders via credit card. For customers who choose this method of payment there are two options; over the phone or online. For both options the credit card information is only used for the purposes of processing the requested payment, we do not store credit card information.

2.1.3. Call Recordings

Please be aware, we record our inbound and outbound calls. This information is used as a record for sales contracts, fact verification and for fraud prevention purposes. We will retain the call recordings for as long as reasonably necessary to perform such activities and then delete them. Any personal information obtained from you during the call will be treated in accordance with the provisions of this Privacy Policy. We do not record credit card information.

2.1.4. Email Marketing Preference Information

We send our subscribers email marketing with information about new products, price changes, EOL notices, event invitations, news, information and offers. Subscribers may be:

- Users who have specifically consented via an opt-in
- Existing customer who have bought similar products or services from us in the past
- Potential customers who have recently expressed an interest in similar products of services

We provide a simple way to opt out of receiving our electronic marketing in every mailing we send. We do not hide or conceal our identity, all marketing emails will be sent from the provu.co.uk domain and include our contact information.

In light of GDPR we have updated our systems to ask for users' consent to be added to our mailing list. This means that unless an individual was on our mailing list prior to May 2018, they cannot be automatically added without confirming that they would like to receive our marketing emails.

From the email marketing we send, we store and have access to basic tracking information. We monitor open rates, opening times and frequency of opens. We also have access to unsubscribe stats. This information allows us to measure the success of the emails we send and helps us to make improvements to the content we share with our resellers.

2.1.5. Outbound Telephone Marketing and Calls

We may on occasion make calls to our customers and potential customers, to conduct account reviews or to inform individuals of products, services and upcoming events we feel may be of interest to them. Similarly we may make calls to our suppliers and or potential suppliers to discuss purchasing of goods or to discuss their offerings. We use legitimate interest as a basis for this form of communication. Should individuals wish not to be contacted in this way and for this purpose they have the right to opt-out of further such communications.

2.2. Information about our Customers' End Users

2.2.1. For Delivery Services

If you ask us to drop-ship an order on behalf of your customers we ask for the following personal data; name, company name, address, contact number and email address. Names and addresses are essential pieces of information for the courier to be able to deliver the goods to the correct address. Contact numbers and email addresses are optional information which can significantly help to increase the success rate of a delivery.

This information is passed on to your chosen courier. For example if you select a DPD service this information will be shared with DPD in order for them to be able to fulfil the requested delivery service.

We hold contact numbers and email address details for 90 days post shipment, this will allow us to handle any disputes should they arise with the courier. After this time we will delete this information. We will continue to hold the address of the shipment to allow an order to be identified, this information will be available for you to see and search for in ProSys. This data is also held for proof of shipping, in case of a legal claim.

2.2.2. For Provisioning Services

If you ask us to provision and/or label your customers' devices you are able to provide us with usernames, display names, passwords and other SIP provisioning settings. Even after the device has provisioned we continue to keep this information so that a device can be searched for within ProSys. This also means if you would like to update the details you are able to see what is being changed. Once a device has been provisioned we delete the passwords from the provisioning server after 15 days.

Most of the details you provide us for provisioning will not be shared with a third party and the data will remain on our provisioning server. However, there may be some exceptions where we pass usernames, passwords and other SIP details to the vendor of the product or service, this will be the case where the provisioning happens on the vendor's own provisioning server and not our own. We will however pass MAC addresses to the vendor's redirection server.

We collect logs of IP addresses that request provisioning, this data is important as it can be used to identify if a device is trying to attack our provisioning server.

2.3. Information we collect from our Website

2.3.1 Forms

There are a number of forms on our website where we ask for personal information. The data collected is only used for the purpose outlined in the form. This information will never be shared with a third party except where explicitly stated in the form.

2.3.2. Cookies

Cookies are small files which are stored by your internet browser on to the device or computer you are using. Our website and blog uses cookies the cookies give us important information about various pages on the websites and how our users interact with them. We use this information to improve the performance of our website and the information presented to users.

Most browsers allow users to delete and disable cookies stored by our sites at any time. Please note that cookies are specific to individual browsers so if you use more than one browser, you will need to delete cookies on each.

2.3.3. Other Websites

Please note: our website provides links to other websites run by other organisations. This privacy policy applies only to our website. We encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

2.4. Information we don't Collect

We do not collect any special category data. This includes details about 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.

3. Sharing your Information

We will not share your information with any third parties for the purposes of direct marketing.

We work with a number of subprocessors who play an essential part in order for us to offer our products and services. We limit who we share the data with and only share the necessary personal information to fulfil the service as required by our customers. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it.

3.1. Transfers of your Information out of the EEA

We may from time to time need to transfer your personal information outside the European Economic Area. Any transfer of your data will be subject to adequate levels of protection that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach.

3.2. Who are our Subprocessors?

3.2.1. Couriers

Vendor	Website
DPD	http://www.dpd.co.uk/
APC	https://apc-overnight.com/
Royal Mail	https://www.royalmail.com/
FedEx	http://www.fedex.com/

3.2.2. Product Manufacturers

Vendor	Website
2N	https://www.2n.cz/
3CX	https://www.3cx.com/
Algo	http://www.algosolutions.com/
Asus	https://www.asus.com/
Cisco	https://www.cisco.com/
CounterPath	http://counterpath.com/
DrayTek	https://www.draytek.co.uk/
Gigaset	http://gigasetpro.co.uk/
Polycom	http://www.polycom.co.uk/
SARK	http://aelintra.com/
Sennheiser	https://en-uk.sennheiser.com/
Snom	http://snom.com/
VTech	https://businessphones.vtech.com/
Yealink	http://www.yealink.com/

3.2.3. Other

Vendor	Website
CreditSafe	https://www.creditsafe.com

There may be some circumstances where we are legally obliged to share information. For example we are required to do so by Union or Member State law this may be in regards to crime detection and anti-fraud.

4. Where we Store your Data

- Bytemark data centre in the UK
- In our office
- Encrypted cloud backups (encrypted before transfer)

5. 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.

- We have an Information Security Policy, and conduct staff training in regard to our data protection procedures.
- We consider data protection issues as part of the design and implementation of systems, services, products and business practice.
- We update our servers daily and regularly scan for common faults using Qualys.
- Our systems are under continuous development for maintenance and improvements.
- We have self certified PCI-DSS Compliance for safe handling of credit and/or debit card data.

While we take commercially reasonable measures to ensure the safety and security of your data, due to the inherent risks with the Internet, we are unable to guarantee the absolute security of your data when using our services.

6. Safety of Children

Our products and services are not intended for and may not be used by children. "Children" are individuals under the age of 16. ProVu does not knowingly collect personal data from children. If it comes to our attention that we have collected personal data from a child, we may delete this information without notice.

7. Liability

Our liability shall be subject to the exclusions and limitations of liability in our Terms and Conditions, which can be found at www.provu.co.uk/terms-and-conditions

8. Changes to our Policy

We may make changes to this Privacy Policy from time to time. In circumstances where a change will materially change the way in which we collect or use your personal information or data, we will send a notice of this change to all of our partners. We encourage you to check this Privacy Policy from time to time to review the most current version.

9. Your Rights

The GDPR includes the following rights for individuals:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- the right not to be subject to automated decision-making including profiling

9.1. Exercising your Rights

If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated. If you have any questions, or would like to exercise your privacy rights, please contact us using the details below:

ProVu Communications Ltd
Savile Mill, Savile Street
Milnsbridge
Huddersfield
HD3 4PG
United Kingdom

contact@provu.co.uk

01484 840048