

1.0 Who Are We?

Fourteen IP Group Ltd are a Systems Integrator that specialises in voice and data solutions for the Hospitality Industry, Fourteen IP Group Limited is a company registered in England and Wales under the company number and 06675473 whose registered office is Unit 4, Lockflight Buildings, Wheatlea Industrial Estate, Wheatlea Road, Wigan, WN3 6XP. VAT number: 108 5724 16.

This privacy notice applies to the clients of Fourteen IP Communications Ltd, Fourteen IP Hospitality Communications Europe Ltd, Fourteen IP Inc., Fourteen IP Communications (Canada) Ltd, Fourteen IP Mexico S. de R.L de C.V and Evolution Voice Inc. ("Fourteen IP").

2.0 Overview

Fourteen IP ("we" or "us") is committed to data protection and data privacy. The General Data Protection Regulation (GDPR) became enforceable on 25th May 2018.

We hold personal data on all our clients to meet legal obligations and to perform vital business functions. This notice details the personal data we may retain, process and share with third parties relating to our contractual and vital business operations. We are committed to ensuring that your information is secure, accurate and relevant. To prevent unauthorised access or disclosure, we have implemented suitable physical, electronic, and managerial procedures to safeguard and secure personal data we hold.

3.0 Introduction

We have issued this notice to describe how we handle personal information that we hold about our customers and suppliers (collectively referred to as "you").

We respect the privacy rights of individual representatives of our customers and suppliers and are committed to handling personal information responsibly and in accordance with applicable law. This notice sets out the personal data that we collect and process about you, the purposes of the processing and the rights that you have in connection with it. If you are in any doubt regarding this notice, please contact;

Dean Savage – General Counsel

Address: Unit 4 Lockflight Buildings,
Wheatlea Industrial Estate,
Wheatlea Road,
Wigan, WN3 6XP
Tel: +44-1942-369195
Email: Dean.Savage@14ip.com

Kevin Burgess – CTO

Address: Unit 4 Lockflight Buildings,
Wheatlea Industrial Estate,
Wheatlea Road,
Wigan, WN3 6XP
Tel: +44-1942-369196
Email: Kevin.Burgess@14ip.com

4.0 Types of Personal Data We collect

During your contractual interaction with us, we may process personal data about you purely to perform business only functions, to provide the service detailed in our agreement only, to be able to run our business as a supplier or as a customer to our suppliers.

The types of personal information we may process include, but are not limited to:

- Identification Data – such as your name, name of your business, your position within your business
- Contact Details – such as business address, telephone numbers, email addresses.

We may also record meetings via Microsoft Teams and/ or other virtual meeting applications ("Apps") via the Apps recording function e.g. Microsoft Co-Pilot. You will always be asked to

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consent to the meeting being recorded. The purpose for recording meetings is to ensure important details are not missed during a call and recordings will not be sent on to third parties without your consent.

5.0 Sensitive Data

Sensitive personal data ('special categories of personal data' under the General Data Protection Regulation) includes any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, genetic data, biometric data for the purposes of unique identification, trade union membership, or information about your health/sex life. We do not collect or process any sensitive personal information about you as our direct customer/supplier.

6.0 Purposes for Processing Personal Data

6.1 Legitimate Business Purposes

We may collect and use personal information when it is necessary for legitimate purposes, such as to help us conduct our business more effectively and efficiently with our customers and suppliers. Our IT service provider will record and monitor usage of all our IT equipment, user activity, voice traffic, email and Internet usage as deemed necessary. The IT service providers will observe the strictest confidentiality when undertaking these activities. They will make their report directly to internal management who will determine the actions that may need to be taken in any particular case.

6.2 Legal Purposes

We may also use your personal data where we consider it necessary for complying with laws and regulations.

7.0 Legal Basis for Processing Personal Data

Our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the way we collect it. We will normally collect personal data from you only where we need it to perform a contract with you (i.e. to provide the service as a supplier or customer to you), where we have your freely given consent to do so, or where the processing is in our legitimate interests and only where this interest is not overridden by your own interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

Any processing based on consent will be made clear to you at the time of collection or use – consent can be withdrawn at any time by contacting Dean Savage, General Counsel or Kevin Burgess, CTO.

8.0 Who We Share Your Personal Data With

We take care to allow access to personal data only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the data is used in a manner consistent with this notice and that the security and confidentiality of the data is maintained.

9.0 Transfers to Third-Party Service Providers

In addition, we make certain personal data available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data protection and data privacy laws. For example, some personal data will be uploaded to our customer CRM, the information in this system can be accessed by the CRM system provider for our own training and system maintenance purposes.

10.0 Transfers To Other Third Parties

We may also disclose personal data to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process
- In response to lawful requests by public authorities (including for national security or law enforcement purposes)
- As necessary to establish, exercise or defend against potential, threatened or actual litigation
- Where necessary to protect the vital interests of our employees or another person
- In connection with the sale, assignment or other transfer of all or part of our business; or
- With your freely given and explicit consent

11.0 Transfer Of Personal Data Abroad

We may need to transfer personal data to countries outside of the United Kingdom. When we export your personal data to a different country, we will take steps to ensure that such data exports comply with applicable laws. For example, if we transfer personal data outside the European Economic Area (EEA), such as to the United States, we will implement an appropriate data export solution such as entering into contracts with the data importer that contain EU model clauses or taking other measures to provide an adequate level of data protection.

12.0 Data Retention

Personal data will be stored in accordance with applicable laws and kept for as long as needed to carry out the purposes described in this notice or as otherwise required by law. Generally, this means your personal information will be retained for the duration of our working agreement as a supplier or customer to you/your business plus a reasonable period of time thereafter to respond to business functions/inquiries or to deal with any legal matters or engage legal authorities.

13.0 Your Rights

You may exercise the rights available to you under data protection law as follows:

- 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.
- Rights in relation to automated decision making and profiling.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. You can read more about these rights at: <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

To exercise any of these rights, please see the appropriate Contact Details below.

14.0 Issues and complaints

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This notice was drafted with clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed.

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office in their capacity as the statutory body which oversees data protection law – www.ico.org.uk/concerns.

15.0 Updates to This Notice

This notice may be updated periodically to reflect any necessary changes in our privacy practices. Any updates will be reflected at www.fourteenip.com.

16.0 Contact Details

Please address any questions or requests relating to this notice to;

Dean Savage – General Counsel

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Change Control

Version	Date of review/ amendment	Amendments Made
2	22nd January 2025	Address updated Entities updated 4.0 – Teams and Co-Pilot recording added
1	22nd May 2018	Document Created