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1. INTRODUCTION

In this notice “Voiceworks” (“we, “our” or “us”) refers to Voiceworks and our UK affiliate Enconvo UK Ltd.

Voiceworks ideates, develops and supplies innovative communication resources for the commercial market. As a result of our service offerings, Voiceworks processes personal data relating to actual and prospective wholesalers, resellers and distributors (collectively referred to as “partners”), end-customers and end-users of the products and services that are provided via our partners (in a limited capacity), our suppliers, as well as other parties that otherwise interact with us, use our website, or show an interest in our products and services (“you”, “your”).

In this privacy notice, you can read about the personal data we collect, what purposes we use this data for, how we protect your privacy and personal data, how long the data is stored and how you can view and/or correct the personal data we store on you.

Voiceworks does not share personal data with third parties, unless this is (1) legally required, (2) necessary to supply a service, (3) specifically requested by the party that has provided the personal data or (4) otherwise has a legitimate interest in doing so, measured against the rights, freedoms and expectations of data subjects.

We may provide additional privacy notices or information to you at the time we collect your data. For example, if you apply for a job with us. Such notices will govern how we process the information you provide at that time.

Throughout this document we refer to Data Protection Legislation, which means the Data Protection Act 2018 (DPA 2018), United Kingdom General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, it also includes the EU General Data Protection Regulation (EU GDPR). This includes any replacement legislation coming into effect from time to time.

2. CONTROLLER AND CONTACT DETAILS

Voiceworks is the controller for the personal data we process as identified in this privacy notice. In some circumstances, Voiceworks will process data on behalf of other organisations (e.g. on behalf of one of our partners, each of which will have their own purposes for processing the data). In such circumstances, the other organisation will be the controller and so you should refer to their privacy notices for details of how your data is processed.

Occasionally, Voiceworks may be a joint controller with one of our partner organisations. Such processing may be communicated to you in a separate privacy notice.

Voiceworks and its UK affiliate Enconvo UK Ltd. both sit within the wider Enreach Group, and so while this privacy notice specifically covers Voiceworks activity:

- An Enconvo privacy notice can be found here: https://enconvo.co.uk/wp-content/uploads/enconvo_website_privacy_policy.pdf.
- An Enreach Group privacy notice can be found here: https://voiceworks.co.uk/hubfs/voiceworks_website_privacy_policy.pdf.

2.1 Contact information

Business name: Voiceworks / Enconvo UK Ltd.

Address: Communications House, Hadley Park, Telford, Shropshire, TF1 6QJ Phone: 0333 038 8788

2.2 Data Protection Officer

We have appointed The DPO Centre as our UK Data Protection Officer (DPO) to help us monitor internal compliance, inform, and advise on data protection obligations, and act as a point of contact for you (data subjects) and the ICO.

The UK DPO forms part of our wider Data Protection Team. If you would like to exercise one of your rights, or you have a question or a complaint about this notice or the way your personal data is processed, you can contact the Data Protection Team at:

Email: partner.dataprotection@voiceworks.co.uk

3. HOW WE COLLECT YOUR PERSONAL DATA

We may collect personal data directly from you or indirectly through a third party, depending on your relationship with us.

We may collect your data directly if you provide your data to us through your use of our website, via online forms or questionnaires, through phone conversations, by email, in person (at conferences, workshops, seminars or events), and so on. Alternatively, we may collect your data indirectly through your employer, one of our partners (or their end customer), approved sales and marketing channels, or another third party (e.g. if we need to carry out a credit check). Whether your data is collected directly or indirectly, we will always provide our privacy information where required under Data Protection Legislation.

If you, as a partner or end-customer, provide us with personal data about individuals other than yourself, for example by making our telecommunication solutions available to your employees, customers, or end-users, you are obligated to inform your end users about this transfer of personal data to Voiceworks.

Please note that personal data can be required in order for you to use the features of the website. Additionally, it can be necessary for us to collect and process your personal data in order to provide and optimise our services for you. For example, we need your contact information to be able to book a meeting with you, receive inquiries from you via our contact form, or send you a newsletter. If you choose not to provide personal data to us, you might not be able to make use of the desired service/function or technical assistance.

4. WHAT PERSONAL DATA WE COLLECT

We only collect personal data that we know we will genuinely use and in accordance with Data Protection Legislation. The type of personal data that we will collect depends on the nature of the relationship that we have with you.

Personal data is information that can be linked to an individual. The type of personal data that we will collect depends on the nature of the relationship that we have with you. We may collect the following:

- **Contact Information:** Business contact information (such as name, job title, employer name, email address, mailing address, phone number).
- **Financial Data:** Information needed to process payments and for financial recordkeeping (such as

bank account numbers, VAT numbers, payment transactions, etc.). Note: this data will typically relate to your employer rather than yourself as an individual.

- **End User Communication Data:** Data that we legally need to maintain relating to end users of Voiceworks services, such as name, address, phone number, email address, call detail records (CDRs), photos and media (optional), extension, SIM number, IP address, communications content, any other voluntary submitted data.
- **Service & Support Data:** Records of conversations through our service and support channels, such as emails and call recordings, as well as your account and services information.
- **Verification Data:** Information, such as Photo ID, where this is needed for verification purposes.
- **Visitor Data:** Minimal data collected to register you as a visitor, should you visit our offices, as well as any CCTV recordings, should you be captured by CCTV onsite.
- **Website and Analytics Data:** Information collected through your use of our website, such as cookies and IP addresses.

Other information that we may collect that is not specifically listed here but that we will use in accordance with this privacy notice or as otherwise disclosed at the time of collection.

In most instances, you are under no statutory or contractual requirement or obligation to provide us with your personal data; however, we will often require elements of the information above in order to provide our services to you in an efficient and effective manner.

5. WHAT DO WE USE THIS INFORMATION FOR?

5.1 Lawful basis

We only process, store or transfer your personal data when we have a lawful basis for doing so. The lawful basis we rely on to process the information is identified in the table as per 5.2, and will be one of the following:

- **Legitimate Interest:** processing is necessary for the purposes of our legitimate interests (i.e., our business interests), except where such interests are overridden by your interests or fundamental rights and freedoms.
- **Consent:** You have given consent to the processing of your personal data for one or more specific purposes.
- **Legal obligation:** processing is necessary for compliance with our legal obligations.
- **Vital interests:** processing is necessary in order to protect the vital interests of the data
- **Contractual obligation:** processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.

5.2 Processing activities

We may use your data to:

Processing activity	Personal Data Category (see section 4)	Lawful basis
Contact you following an enquiry or in reply to any questions, suggestions, issues, or complaints you have contacted us about.	Contact Information; Service & Support Data	Legitimate Interest

Follow up on any interest you have shown in our products and services (e.g. to email you regarding a partially completed webform).	Contact Information; Service & Support Data	Legitimate Interest
Facilitate meeting and quotation requests.	Contact Information; Service & Support Data	Legitimate Interest
Communicate with you and send B2B marketing communications, including where you have attended events or webinars. See also section 9 of this notice.	Contact Information	Legitimate Interest or Consent
Generate marketing/analytics from our website using cookies. This includes the monitoring, development and improvement of the website and your experience. For full details on our use of cookies please see our section 7 of this notice and/or our cookie banner.	Website Data	Consent
To manage your account and =billing information.	Contact Information; Financial Data; Service & Support Data	Contractual Obligation (when the contract is with you) or Legitimate Interest (when the contract is with the organisation for which you work)
Carry out financial checks (e.g. if you are a company director) should they be required when you or your company purchase our services.	Contact Information; Verification Data; Service & Support Data; Financial Data	Legal Obligation or Legitimate Interest
Provide training and support in the use of our products and services.	Contact Information; Service & Support Data	Legitimate Interest
Provide, operate and improve services purchased or sold to you or your employer by you, your employer or one of our partners.	Contact Information;	Contractual Obligation (when the contract is with you) or Legitimate Interest (when the contract is with the organisation for which you work)
When one of our partner organisations has resold certain Voiceworks services, we must store certain information from end users for a specific time period for the purposes of legal investigations and to cooperate	End User Communication Data	Legal Obligation

<p>with requests for personal information from competent authorities or other authorised governmental institutions, as well as with requests for information we process and store as part of our normal business operations.</p> <p>When the storage period has elapsed, stored information is destroyed or made anonymous. be transmitted to the relevant authorities, even when you have blocked the display of your telephone number.</p>		
Negotiate and/or enter into and/or fulfil a contract with you, or the organisation for which you work, including to fulfil pre-contractual steps, such as supplier questionnaires, as part of our onboarding process.	Contact Information; Service & Support Data; Verification Data; Financial Data.	Contractual Obligation (when the contract is with you) or Legitimate Interest (when the contract is with the organisation for which you work)
Comply with applicable laws, lawful requests, and legal process, where appropriate/necessary.	Potentially any data items from section 4 should there be a legal or regulatory need, but please note the data minimisation principle will be followed at all times.	Legal Obligation
Comply with regulatory monitoring and reporting obligations, where appropriate/necessary.		
Digitally monitor and/or record calls between you and us for the purposes of quality control and staff training. You will be informed of this prior to the call.	Contact Information; Service & Support Data	Legitimate Interest
Meet our high security standards in managing your personal data, our systems and our website.	Potentially any data items from section 4 should there be a legal need (to the extent that security provisions are deemed “processing”)	Legitimate Interest
Share your data with healthcare professionals if you are taken ill or involved in an accident while visiting our office or sites, and are unable to provide your consent.	Visitor Data	Vital Interest
To ensure of your safety and security whilst onsite at our offices. For example, collecting visitor information allows us to evacuate the premises efficiently in case of a disaster, while camera recordings protect visitors, personnel and the building. You will be clearly informed about the presence of cameras when on our premises.	Visitor Data	Legitimate Interest

5.3 Sensitive information

In our capacity as a controller, we do not actively collect 'special category data' for any of the purposes described in this notice. If for whatever reason we need to collect such data, you will be informed at the time of collection and it will only be done so with your explicit consent or in line with other lawful purposes under Data Protection Legislation.

5.4 Anonymous information

We may create anonymous, aggregated, or de-identified data from your personal data and other individuals whose personal data we collect. We do this by excluding information that makes the data personally identifiable to you.

6. COOKIES

6.1 Information about our use of cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. You can set your cookie preference when you first visit our site using the cookie banner.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your permission. We currently only use necessary cookies, but this site may use different types of cookies in the future, this could include cookies placed by third-party services that appear on our pages.

If we ask for your consent for cookies then this applies to the following domain:

www.voiceworks.co.uk

6.2 Types of cookie

We classify cookies as either, necessary, preference-based, statistical, or marketing based. Should we start using cookies that are not strictly necessary, descriptions of what each of these cookie classifications mean and the cookies that we use which come under each of these headings will be made available through our cookie banner, prior to you providing your consent or adjusting your cookie settings.

Our cookie banner will also provides information about the purposes for each cookie we use and the duration they are used for.

6.3 Updating your cookie settings

When you visit our website for the first time, you will be presented with a cookie banner. Should we use non-necessary cookies, the banner will ask for your consent for the placement of non-necessary cookies or otherwise allows you to adjust your cookie settings.

Please note, if you use your browser settings to block all cookies (including necessary cookies) you may not be able to access all or parts of our site.

If you require further information, please contact us by using the contact details provided above.

Once you have interacted with our cookie banner, you can change your cookie preferences at any

time by visiting our home page and by clicking on the icon in the bottom left-hand corner of the screen.

7. WHO WE MIGHT SHARE DATA WITH

We may share your personal data with trusted third-party organisations as follows:

- In certain circumstances, for example due to legislation, it may be necessary to pass on information to the authorities or directory inquiries databases. Disclosure may also take place if necessary to establish or defend legal claims.
- As part of our group wide activities we may share aggregated data about our customers in the form of business intelligence and statistics with members of the Enreach Group, in which Voiceworks sits. The Enreach Group is headquartered in the Netherlands, and will also provide support for some Voiceworks services
- We might also pass on your personal data to data processors acting as suppliers for us, e.g. for sending out newsletters and website maintenance, for data storage and analytics; technology support and services (email, web hosting, marketing, and advertising providers, etc.).

We only share your data with data processors that can provide sufficient guarantees that they will process your data securely and in accordance with Data Protection Legislation. Our data processors cannot do anything with your personal data unless we have instructed them to do it. They will not share your personal data with any organisation apart from us or further sub-processors which must process your personal data to the same high standards.

- With partners that resell our products and services, or with whom we jointly process your data.
- With professional advisors, such as lawyers, bankers, auditors, and insurers, where necessary in the course of the professional services that they render to us.
- With government or law enforcement officials or private parties as required by law and disclose and use such information as we believe necessary or appropriate.

8. INTERNATIONAL TRANSFERS OF INFORMATION

Most third parties that we engage with are based in the UK or in the case of some of our products and services that we resell, the European Economic Area (EEA). Should we need to transfer your personal data outside of the UK to countries not deemed by the ICO to provide an adequate level of personal data protection, the transfer will be based on safeguards that allow us to conduct the transfer in accordance with the Data Protection Legislation, such as the specific contracts approved by the ICO providing adequate protection of personal data.

We may share personal data between Voiceworks and other entities within the Enreach Group internationally. We do this based on group wide agreements, where we have mapped the transfers and designated the responsibility for compliance with Data Protection Legislation, amongst members. Transfers between the UK and the majority of Enreach Group members are deemed adequate by the European Commission and the ICO. Where this is not the case, the aforementioned group-wide agreements will contain appropriate safeguards to permit the transfer. For more information regarding these transfers please contact us using the details above.

9. HOW WE KEEP YOU UPDATED ON OUR SERVICES

As a business contact, we will send you relevant news about our services in a number of ways including by email, but only if we have a legitimate interest to do so. Marketing communications will be sent from our own domain.

Each email communication will have an option to object to the processing, if you wish to amend your marketing preferences, you can do so by following the link in the email and updating your preferences.

We make every effort to ensure that we only send such communications to those acting in a business capacity and do not send such materials to consumers via personal email addresses if it is clear they are not acting in such a capacity.

An exception to this will be where you have provided your consent to be contacted specifically. In such cases you can withdraw this consent by contacting us using the details provided in this notice.

10. SECURITY

Data security is of great importance to Voiceworks and to protect your data we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including:

- Limiting access to our buildings to those that we have determined are entitled to be there (by use of passes, key card access and other related technologies).
- Implementing access controls to our information technology.
- We use appropriate procedures and technical security measures (including strict encryption and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps, offices, and stores.

11. YOUR RIGHTS OVER YOUR INFORMATION

Under the UK GDPR, you have a number of rights regarding our processing of your data. To exercise these rights, please contact our Data Privacy Team using the contact details above. We may ask for proof of identity and sufficient information about your interactions with us so that we can locate your personal information.

11.1 The right to be informed about our collection and use of personal data

You have the right to be informed about the collection and use of your personal data. We ensure we uphold this right with our internal data protection policies and through this and other privacy notices. These are regularly reviewed and updated to ensure these are accurate and reflect our data processing activities.

11.2 Right to access your personal information

You have the right to access the personal information that we hold about you by making a request. This is referred to as a 'Data Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), for non-complex requests, we will provide it to you or them within one month from when your identity has been confirmed.

11.3 Right to rectify your personal information

If any of the personal information we hold about you is inaccurate, incomplete, or out of date, you may ask us to correct it.

11.4 Right to object or restrict our processing of your data

You have the right to object to us processing your personal information for particular purposes or have its processing restricted in certain circumstances.

11.5 Right to erasure

You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

11.6 Right to portability

The right to portability gives you the right to receive personal data you have provided to a controller in a structured, commonly used, and machine-readable format. It also gives you the right to request that a controller transmits this data directly to another controller.

11.7 Rights in relation to automated processing

An automated decision is one that is made by our systems rather than a person. Under Data Protection Legislation, you have the right to express your concerns and object to a decision taken by purely automated means. You also have a right to request that a person review that decision.

This right is unlikely to apply to Voicework's use of your data, as any automated processing we carry out is unlikely to make decisions and would include human intervention. If you would like to discuss this in further detail, please contact us as set out above.

12. QUESTIONS OR COMPLAINTS

The ICO regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/for-the-public>.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first (using the contact details above). Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

13. HOW LONG WE KEEP YOUR INFORMATION FOR

We will retain your personal information in order to provide you with a high-quality service, in accordance with Data Protection Legislation and 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 information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means.

In some circumstances we may anonymise your personal information (so that it can no longer be

associated with you).

14. REVIEWS AND SHARING YOUR THOUGHTS

When using our websites, you may be able to share information through social networks like Facebook and X, or review platforms such as Trustpilot. For example, when you 'like', 'share' or review our services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts, so you are comfortable with how your information is used and shared on them.

15. OTHER LINKS

Please be aware that the website may link to other websites that may be accessed by you. We are not responsible for the data policies, content or security of such sites. We do not have any control over any use of your data by third parties when you visit such sites or otherwise provide your data through these channels.

16. CHANGES

Voiceworks reserves the right to modify or amend this notice at any time. The effective date will be displayed below the statement. It is the user's responsibility to check this document regularly for changes.

Thank you for taking the time to read our privacy notice.

Last updated: June 2025.