



Data Processing

- Vivio process your Personally Identifiable Information which includes: Name, Address, Telephone Number, Bank Details, Credit history
- The categories of data we process for Data Subjects (our Customers and Employees) is Customer Data and Employee Data
- Our Data processing is carried out at our Vivio offices at The Vault, Chester
- We only process UK Data Subjects – no data is transferred outside the EU
- Data is processed by our secure Customer Services Data-Base
- Data is usually processed for the duration of the Contract with us – usually 12 months
- When a contract has expired, we will hold your data on our servers for up to 7 years for Legislative purposes. Your data will no longer be processed
- Vivio maintains its customer records on a secure file share/data-base
- Vivio have a documented procedure for obtaining, processing and storing personal data which is available on request
- Vivio is registered with the ICO – Registration number: Z8135166
- The source of the Personal Data that Vivio provides to its Customers and Business partners is either directly from Customers or Telco providers
- The lawful basis for Vivio collecting this information is Legitimate Business Interest and the performance of a Contract

Data Security & Records Management

- Vivio have a data protection policy that is available on request
- Vivio has an Information Security Policy that is available on request
- Vivio has a records management and retention Policy in alignment with its statutory and contractual obligations
- Vivio carry out regular Security Risk assessments with its IT infrastructure partner
- Vivio have physical access control in place to its premises. Data which is held on PC's has log-on and password security.
- Vivio use multiple physical servers with virtual servers on them, these are replicated and backed up off site. We also have firewalls in place with managed ports together with AV/AM endpoint security. Data is restricted via GPO and all systems have ID and password authentication. This solution provides confidentiality, integrity, availability and resilience.
- In the event of a physical or technical incident, our IT infrastructure (see above) can restore an entire server image within 90 mins
- Our IT infrastructure is reviewed bi-annually to ensure security of processing
- Vivio encrypts 'in transit' data

- To ensure data security all systems level access is protected by ID/password combinations and access is restricted through permissions controlled by GPO. Server room is in a dedicated access-controlled room.
- Vivio's employees receive annual training on information security and data protection
- All employees are required to sign Non-Disclosure Agreements during their induction training
- Access to data is granted to employees based on their role, controlled by GPO's
- Access levels are reviewed regularly to ensure they are appropriate
- Processes are in place for joiners/leavers/movers to ensure access levels are controlled and maintained

GDPR Readiness

- In preparation for GDPR Vivio has:
 - Up-dated its Privacy Notices
 - Conducted a full Data Process Impact Assessment
 - Up-dated it's Information Governance Policy
 - Up-dated it's Subject Access Request
 - Documented the Legal Basis for Processing Personally Identifiable Information
 - Documented processes for responding to Individuals Rights under GDPR
 - Up-dated our Terms & Conditions
 - Reviewed our Direct Marketing approach
- Vivio are fully compliant with GDPR as of 25/5/2018
- Vivio has up-dated their Terms & Conditions under GDPR, with explicit consent identified separately for data subjects to affirm agreement to processing of their data
- Vivio has conducted a Data Flow audit within the DPIA to identify any gaps in compliance when processing PII
- Vivio has conducted a mapping exercise to identify where we process personal data.
- Vivio has changed its T's & C's, Marketing activities, and Privacy Notices for its Customers and Employees to align with GDPR

GDPR Requirements & Data Subject Rights

- Vivio has up-dated their Privacy Notices – these are available on the Vivio website at www.vivio.co.uk/terms, or on request
- Vivio has processes in place to ensure we can purge personal data records to ensure compliance with GDPR Individual Rights to Erasure
- Personal data records can be accessed to ensure they remain current, accurate and up to date.
- Where accuracy of personal data is contested by a Data Subject, Vivio has processes in place to enable verification of the accuracy of the data, and where necessary will restrict processing.

- Vivio has revised its Subject Access Request form, which has been up-dated on its web-site at www.vivio.co.uk/sar, and has processes in place to support access requests.
- Vivio has the ability to track and record and store 'Consent'. We can evidence consent as part of an audit.
- Vivio has conducted a Privacy Impact Assessment as part of its GDPR readiness
- When a Data Subject exercises their right of Erasure or Restrict Processing, Vivio's processes include identity verification.
- To comply with the Right of Data Portability under GDPR, Vivio stores its personal data in a machine-readable format.

Data Protection Officer

- Vivio has appointed a 3rd Party DPO in line with GDPR timing and requirements
- The DPO will be the point of contact for GDPR related queries

Data Breaches

- Vivio has documented Data Breach Policies and Procedures in place
- Vivio has provision for meeting the 72-hour deadline for breach notification and informing the ICO where necessary
- Vivio is actively considering insurance for Data Protection and Information Security Breaches

Third Parties

- Vivio have contacted all relevant 3rd parties to assess and ensure their GDPR readiness
- Contracts and T's & C's have been revised to obtain written approval from Business Partners prior to sharing information.

How Vivio Use Your Data

- Vivio uses and manages the information we may hold about our Clients and their employees. This includes:
 - (a) Why we collect and keep information about you and your employees.
 - (b) What information we collect.
 - (c) How long we may keep this information.
 - (d) Who may see this information.
 - (e) Who we may share this information with.
 - (f) Your rights in relation to your information.

- **Confidentiality.** Vivio collects, stores and uses only small amounts of personal information. The information we do collect is used by different people as part of their normal work. We take our duty to protect personal information very seriously. We will take all reasonable means to keep this information confidential whether this is held on computer, on paper or on other media. Every member of staff working for Vivio has a legal duty to keep information about you and your employees secure and confidential. This is also included in staff contracts of employment.

- **Information we hold about you.** At Vivio, we aim to provide you with the highest quality of Client Service. To do this we must keep records about you, your company, your employees and the services we have provided to you or plan to provide to you. The information we hold about you is protected by strict physical, electronic and other means. Our Client Services staff may ask you or your employees to provide certain personal information. This information is necessary in order for us to provide you with the best possible service. Information about you may be written on paper or recorded electronically. The types of information we collect or process may include:
 - (a) Director / employee name(s)
 - (b) Mobile phone number(s)
 - (c) Mobile /fixed line phone call records
 - (d) Director / employee home address(es)
 - (e) Office address(es)
 - (f) Director date of birth
 - (g) Director personal identification documents
 - (h) Director / employee personal contact details such as email address / Phone number
 - (i) Mobile device location information
 - (j) Mobile / fixed service call recordings

- **How your personal information is used.** We comply with the Data Protection Regulations to process your personal data. This is in order to provide you with appropriate services or to meet contractual or legal obligations or because you have consented to provide us with the information. We do not send or process your data outside the European Economic Area. Your records are mostly used to direct, manage and deliver your services so that:
 - (a) Our Client Services team have accurate and up-to-date information about the services you receive, and to provide you and your employees with the right advice and support about these services
 - (b) Any concerns you may have about your Services can be properly investigated. If we intend to use the information for any other purpose then you will normally be asked first. We respect your wishes to not share certain items of confidential information about you and your employees unless we are required to share it by law. We will always explain what information we want to share, why we want to share it and who we want to share it with. This will then help you to decide if that's ok.

From time to time we will also contact you to make you aware of other products that we feel will be of benefit to you and your Company.

- **Who we may share your information with.** Information will be seen by staff looking after you and your employees and by others involved in delivering your services. There is sometimes a need to share information about you with other telecomms providers so that we can work together to provide you with the best service for your needs. But we will only ever share your information when there is legitimate need to do so. We will not share information with friends or relatives unless they are legally acting on your behalf or unless you say it's ok. We will only share your information with anyone else if we really need to, such as to keep you or other people safe or if a court asks for the information.
- **Keeping your information accurate and up-to-date.** We will make sure that the information we hold about you and your employees is accurate and up-to-date. We may check with you from time to time to make sure we have the right information. If the information is not correct, you can ask us to change it.
- **Your Rights**
 - (a) You have the right to be informed about how your personal data is used at Vivio. This document aims to explain how we use this information, but if you are unsure or require more information ask a member of staff.
 - (b) You and your employees have the right to have any inaccurate information corrected.
 - (c) You and your employees have the right to have information deleted or to stop us from using it when we don't need to keep it any more.
 - (d) You and your employees have the right to access the personal information we hold about you.
 - (e) You have the right of portability – to ask for your information in such a way that it can be easily transferred to different service providers
 - (f) You have the right to object if your personal data is being used – particularly for Marketing Purposes
 - (f) You have the right to protect yourself against automated decision making and profiling
- **Can I see my own records?** In most cases you or your employees can see or receive a copy of your records and to have any information you do not understand explained to you. If you have any questions about the personal data we hold please download and complete the Subject Access Request form available at www.vivio.co.uk/sar and then email it to us at mydata@vivio.co.uk. We will provide the information to you within a month of you asking for it.
- **How long do we keep your records?** We keep information about you in paper records and also in electronic records. We need to keep this information in order to provide you with the best possible Service. Certain types of information about you need to be kept for longer than other information. We will not keep information about you longer than is necessary or longer than required by law.
- **Further Information.** If you need further information about the information that we keep about you, speak to a member of staff. We will try to answer your questions. You have the right to complain to the Information Commissioner's Office if you don't think we are dealing with your records correctly. You can write to them at:

Information Commissioners Office, Wycliffe House, Water Lan, Wilmslow, Cheshire, SK9