



Privacy Policy

The data controller of your personal data is Tincan Comms Limited (**we**", **us**", or **our**"). We can be contacted on the below information. This Policy applies to you if you use our services ("**our Services**"), and if you contact us or we contact you about our Services. It also applies to visitors to our websites ("**our Websites**"):

<https://www.tincancomms.com/> We are committed to protecting your privacy. We will only use the information that we collect about you lawfully and in accordance with the current Data Protection Act 2018.

Our Contact Details

Name: Tin Can Comms Limited

By Phone: 0800 083 0900

By Email: support@tincancomms.com

By Letter: Customer Service Team, The Admiral Building, Maple Leaf Estate, Bloxwich Lane, Walsall WS2 8TF

By Web: www.tincancomms.com/contact

The type of information we will collect about you includes:

- your name
- address
- phone number
- email address
- your business type
- payment information such as bank details, direct debit, debit or credit card details that you provide us
- information about financial associates in the case of partnerships
- information about how you use our Services (including but not limited to call traffic and location data and billing information)
- your activity on our Websites when you log in as a user
- phone records including the numbers you call and send messages to and receive calls and messages from, the date, time length and cost of these communications including the broad location at the time of these communications; call recordings
- roaming information (such as the country you were in and the network used including dates and times)
- your communications with us
- information you give to us when entering customer surveys
- information about your online browsing behaviour on our Websites and information about when you click on one of our adverts

- your activity on our Websites when you log in as a user

Please see below: “**Visitors to our Websites**” For our customers, this personal data is required to provide our Services to you. If you do not provide the personal data information we ask for, it may delay or prevent us from providing our Services to you

How we get the personal information and why we have it:

Most of the personal information we process is provided to us directly by you for one of the following reasons:

1. When you enquire about a product or service, when you make a purchase or during the subsequent processing stages of an order
2. Indirectly through the usage of our Services e.g. when you make calls

Visitors to our Websites We may use technology to track the patterns of behaviour of visitors to our Websites. This can include using a “cookie” which would be stored on your browser. You can usually modify your browser to prevent this happening. The information collected in this way can be used to identify you unless you modify your browser settings. We also track click-through links in emails sent as part of our e-bulletin subscription service. For further information about our use of cookies, please refer to our [cookies policy](#)

Social Share Buttons:

If you click on one of the social share buttons on our Website, personal information will be transmitted to the relevant social media provider. By clicking on a social share button, the provider will receive information that your browser has accessed a specific page on our Website. This occurs even if you do not have an account with the provider or are currently not logged into your account with the provider. This information will be directly transmitted by your browser to the provider’s server (which may be located in countries such as the US) and stored there. If you are logged into an account with the provider, they can directly assign your visit to our Website to your account. If you interact with the share dialogue window (e.g. by leaving a comment), this information will also be directly transmitted to the provider’s server and stored there. This information will also be published on the provider’s page and shown to your contacts. If you do not want the provider to assign the data collected during your visit to our Website to your user account, you must first log out of your account before using the plug-in. To find out more about how the social media providers collect, process and use personal data, as well as how to protect your privacy, please refer to the providers’ privacy policies. Below is a list of the providers whose social share buttons are on our Website with a link to their privacy policies: [Twitter](#) [Facebook](#) [LinkedIn](#) [Google](#)

Information we receive from third parties:

- **Social Media:** publicly available information through social media sites, such as Facebook, LinkedIn, Twitter and Google, including where you have responded to a promotional item or offer from us through social media facilities;
- **Publicly Available Information:** we may collect personal information about you from other publicly available sources. This can include your name, address and other publicly available information. As far as possible, we ensure that where any third parties are involved in supplying such information, that they are compliant to do so. This may include credit reference agencies such as Creditsafe, public registers such as the Companies House registry or the Electoral Register
- **Customer Data:** Through our Services, our customers may collect, store and process personal data about you. We have requested that no Special Categories of Personal Data are collected through the Services, but otherwise we do not control our customers' use or processing of personal data through the Services.

We use the information that you have given us in order to:

- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party;
- to comply with our legal obligations; or
- where you have given consent.

Under data protection law, we can only use your personal data if we have a proper reason for doing so, as per above.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. The table below explains what we use your personal data for and our lawful basis for doing so.

What we use your personal data for	Our lawful basis for processing your personal data
To provide our Services to our customers including checking your eligibility for our Services, managing your account, applications and orders	Necessary for the performance of our contract with our customers or to take steps at our customers' request before entering into a contract
For billing and payment purposes, financial or management forecasts and to collect debt	Necessary for our legitimate interests or those of a third party i.e. In the event that we are forced to pass your information to a debt recovery service

To verify your identity or to perform any other authentication that we need	Necessary to comply with our legal obligations
To find and stop criminal activity, misuse of, or damage to, our Services or network and other assets. Also, to defend our rights or property and protect the rights and interests of our customers and website users	Necessary for our legitimate interests or those of a third party i.e. to minimise fraud that could be damaging for us and for you
To carry out credit checks	Necessary for the performance of our contract with our customers or to take steps at our customers' request before entering into a contract
What we use your personal data for	Our lawful basis for processing your personal data
To tell you about the products and services you use and to let you know if we make changes to them (please note that you will not be able to opt out of receiving essential service communications)	Necessary for the performance of our contract with our customers or to take steps to advise customers of new products that could have a material bearing on the performance of their telephony solutions
To market and advertise our products and services to you – if you have chosen to receive these	Necessary for our legitimate interests or those of a third party i.e. To ensure that customers are being offered the latest technology; or information about end of life of a product which could detrimentally affect their business
For internal purposes such as management, research, analytics, corporate reporting, credit scoring and to improve business efficiencies	Necessary for our legitimate interests or those of a third party i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
To analyse trends in call types, phone usage and undertake industry specific research	Necessary for our legitimate interests or those of a third party i.e. to be in a position to offer better tariffs, products and services to customers
Other processing necessary to comply with legal and regulatory obligations that apply to our business e.g. under health and safety regulations	Necessary to comply with our legal obligations
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	Necessary to comply with our legal obligations
Ensuring business policies are adhered to e.g. policies covering security and internet use	Necessary for our legitimate interests or those of a third party i.e. to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	Necessary for our legitimate interests or those of a third party i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	Necessary for our legitimate interests or those of a third party i.e. to protect trade secrets and other

	commercially valuable information Necessary to comply with our legal obligations
Preventing unauthorised access and modifications to systems	Necessary for our legitimate interests or those of a third party i.e. to prevent and detect criminal activity that could be damaging for us and for you Necessary to comply with our legal obligations
Updating and maintaining customer records	Necessary for the performance of our contract with you or to take steps at your request before entering into a contract Necessary to comply with our legal obligations Necessary for our legitimate interests or those of a third party e.g. making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	Necessary to comply with our legal obligations
Ensuring safe working practices, staff administration and assessments	Necessary to comply with our legal and regulatory obligations Necessary for our legitimate interests or those of a third party e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
The audit of our accounts	Necessary to comply with our legal obligations
To administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Necessary to comply with our legal obligations Necessary for our legitimate interests e.g. for running our business, provision of administration and IT services and networking security
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Necessary for our legitimate interests i.e. to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences	Necessary for our legitimate interests i.e. to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy

Call Recordings and Customer rights:

On-site call recording is under the control of each customer. Customers should ensure that they are compliant with all relevant regulations and legislation applicable to the customer in terms of consent, security, access, resilience, backups, archiving and deletion.

Eve hosted call recording is only accessible by the customer, who in turn has the ability to access and download individual call recordings. The customer determines the accessibility of the call recording data and is responsible for ensuring that access is restricted to and managed in accordance with the customer's own security policies. The customer is able to determine the duration for which the call recording is retained on the server in line with the terms of the customer's licence. Eve call recordings are stored in a tier 3 data centre on resilient RAID6 servers. Physical access to the data is secure and monitored single person point of entry, physically

guarded 24/7 and monitored by integrated digital video surveillance. The data centre conforms to the following certifications: ISO9001:2008; ISO27001:2005; PCI-DSS; BS25999-2:2007; ISO14001. Virtual access to recordings is restricted to company admins and sub access can only be granted by the company call recording administrator. The security of recordings has been and will continue to be tested by industry leading penetration testers who found no security hole to the call recordings. Unless otherwise agreed in writing with Tincan Comms Limited, all call recording data is deleted after 30 days on a rolling basis, or by written request by an authorised and verifiable agent of the customer. Requests for deletion of call recording data sooner than 30 days must be made in writing to Tincan Comms Limited (or other retail supplier to the customer), contain sufficient information for the request to be verified and implemented without impacting on the customer's resilience and operational ability. Where a customer defines longer periods of data retention, these data will be retained and remain accessible to the customer in accordance with the terms of the customer's licence.

Automated Decision Making:

Tincan Comms Limited shares customer personal data with third party financiers where a customer requests funding to lease a telephone system. Customer personal data may be used by Tincan Comms Limited party financiers for credit, fraud and anti-money laundering checks in accordance with the lawful bases set out in the above table. You have the right to contest any decision based solely on automated decision making that produces legal effects concerning you or similarly significantly affects you – see below: '**Your rights**' for information about how you can exercise this right

Your Rights:

You have the following rights, under the GDPR. These consist of:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

Each of these rights are supported by appropriate procedures within Tincan Comms Limited, that allow the required action to be taken within the timescales stated in the GDPR.

These timescales are shown below:

Data Subject Request	Timescale
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	One month

The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
Rights in relation to automated decision making and profiling.	Not specified

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please email, write or telephone **our compliance team** —see below: '**How to contact us**' and let us have enough information to identify you e.g. your full name, address and customer reference number as well as what right you want to exercise and the personal data to which your request relates.

Keeping Your Data Secure:

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully.

We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

Communications over the internet (such as emails) are not secure unless they have been encrypted. We are not able to accept responsibility for any unauthorised access or loss of personal data that is beyond our control.

Our Websites may contain links to other websites operated by other organisations that have their own privacy policies. Please make sure you read the terms and conditions and privacy policy before providing any personal data on a website as we do not accept any responsibility or liability for websites of other organisations.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Sharing Your Personal Information:

Depending on the circumstances, we may share your personal data with:

- third parties we use to help deliver our Services e.g. Lease companies- (providing 3rd party leasing solutions to customer)- Located in the UK
- other third parties we use to help run our business e.g. website hosts, search engine providers that assist us in the improvement and optimisation of our Websites (located in the UK)
- mobile telephone companies, providing telephone services (located in the UK)
- finance companies (if you are applying for third party funding for the leasing of a telephone system) (located in the UK)

- our insurers and professional advisers; providing risk analysis, business continuity plans and insurance (located in the UK)
- external auditors e.g. in relation to the audit of our accounts; (located in the UK)
- our bank (located in the UK)

If we have a contract with another organisation to provide us with services or a service on our behalf to process your personal data, we will make sure they have appropriate security measures and only process your personal data in the way that we have authorised them to. These organisations will not be entitled to use your personal data for their own purposes. If necessary, our security teams will check them to make sure they meet the security requirements we have set.

We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies so that they can detect and stop crime, prosecute offenders and protect national security. We may also need to disclose information to regulatory bodies to comply with our legal and regulatory obligations and as necessary to comply with the law (e.g. in response to a court order).

How Long will we keep your data:

We will keep your personal data while we are providing our Services to you or, using the personal data for the purpose for which it was collected. Thereafter, we will keep your personal data for as long as is necessary:

1. to respond to any questions, complaints or claims made by you or on your behalf;
2. to show that we treated you fairly;
3. to keep records required by law.

We will then securely destroy your personal data. We will not retain your personal data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal data.

Personal data supplied and used for the purpose of entering into a contract for goods or service will be deleted 3 years after you cease to have any relationship with Tincan Comms Limited.

We will never collect sensitive personal data about you (e.g. data about your health), or sell, rent or trade your personal data to third parties for marketing purposes without your consent.

The personal data which we hold will be held securely in accordance with our internal security policy and the law.

How to complain:

We hope that we can resolve any query or concern you may raise about our use of your personal data. If you want to complain about how we have used your personal data, please email or write to our compliance team – see below: '**How to contact us**'. However, if we are not able to resolve your complaint to your satisfaction, you can complain to the UK's supervisory authority, the Information Commissioner's Office (ICO). Further information about how to make a complaint to the ICO can be found on the ICO website www.ico.org.uk.

The EU General Data Protection Regulation also gives you the right to lodge a complaint with the supervisory authority in the European Union state where you work, normally live or where any alleged infringement of data protection laws occurred.

How to contact us

Please contact us by email, post or telephone if you have any questions about this privacy policy or the information, we hold about you.

Our contact details are shown below:

Our contact details	
Name:	Tin Can Comms Limited
By Phone:	0800 083 0900
By Email:	support@tincancomms.com
By Letter:	Customer Service Team, The Admiral Building, Maple Leaf Estate, Bloxwich Lane, Walsall WS2 8TF

This privacy policy was last updated on 23/01/2019

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Cookies:

We use cookies to collect and store basic user data to assist us to deliver the right content via the website. We use some standard cookies from Google (standard visitor traffic tracking) WordPress (content tracking) and Act On (email marketing tracking).

Cookies for follow up purposes

One of the cookies we use allows us to find out your company name if you have a static IP address. We may use this information to follow up with you after your website visit to see if there is any further assistance, we can provide you.

Cookies for Remarketing purposes

Another of the cookies we use allows us to display advertising to you on a select number of websites via Google's Remarketing Platform.

Cookies for Improvement purposes

We also use cookies to monitor how our visitors are using the website, including those provided by Google and Hotjar.