

FIRSTCOM EUROPE LTD – PRIVACY POLICY (2026 EDITION)

(Category-based, telecoms-grade, UK GDPR compliant)

1. Introduction

Firstcom Europe Ltd (“Firstcom”, “we”, “us”, “our”) is committed to protecting the privacy and security of personal data. This Privacy Policy explains how we collect, use, store, share and protect personal data when providing our telecommunications, connectivity, mobile, IT managed services, hosted voice, UCaaS, CCaaS, payment and related services.

This Privacy Policy applies to:

- Customers who purchase services from Firstcom
- Users of services provided by Firstcom
- Visitors to our websites
- Individuals whose data is processed through our platforms

Firstcom acts as:

- **Data Controller** for personal data relating to our direct customers
- **Data Processor** for personal data processed on behalf of our customers (e.g., call recordings, CDRs, contact centre interactions, payment data processed through third-party platforms)

This policy supplements any service-specific privacy notices and may be updated periodically.

2. Categories of Personal Data We Process

We process the following categories of personal data depending on the services you use:

2.1 Identity & Contact Data

- Name
- Address
- Email address
- Telephone numbers
- Job title
- Account details

2.2 Account & Billing Data

- Billing address
- Direct debit details
- Payment history
- Usage data
- Contract information

2.3 Hosted Voice & UCaaS Data

(Processed when using hosted voice, SIP, UCaaS or PBX services)

- Call Detail Records (CDRs)
- SIP logs
- IP addresses
- Device identifiers (e.g., MAC addresses)
- Call recordings (where enabled)
- Voicemail
- Presence information
- Porting information (CLI, account numbers, LOAs)
- Fraud monitoring data

2.4 Contact Centre & CX Data

(Processed when using CCaaS platforms)

- Call recordings
- Chat transcripts
- Screen recordings (where enabled)
- Agent performance data
- Queue and routing logs
- Interaction metadata

2.5 Connectivity & Broadband Data

- IP addresses
- Router logs
- Network diagnostics
- Line performance data
- Traffic metadata

2.6 Mobile Services Data

- SIM activation data
- Usage data (calls, SMS, data)
- IMEI/IMSI
- Roaming data

2.7 Payment & PCI-DSS Data

(Processed through PCI-compliant third-party platforms)

- Tokenised payment data
- Transaction metadata
- Fraud-prevention data

2.8 IT Managed Services Data

- Device monitoring data
- Patch management logs
- Antivirus/EDR telemetry
- Remote access logs

2.9 CRM, Ticketing & Support Data

- Support tickets
- Communications with Firstcom
- Service configuration data

3. How We Collect Personal Data

We collect personal data through:

- Direct interactions (forms, calls, emails, onboarding)
- Automated collection through our platforms
- Third-party service providers
- Resellers and partners
- Porting and provisioning processes
- Payment processing platforms
- Network and service monitoring tools

4. How We Use Personal Data (Lawful Bases)

We process personal data under the following lawful bases:

4.1 Performance of Contract

To deliver services you have purchased, including:

- Provisioning
- Billing
- Support
- Number porting
- Fraud prevention
- Service monitoring
- Call routing
- Emergency services obligations

4.2 Legitimate Interests

To operate and improve our services, including:

- Network security
- Service analytics
- Quality assurance
- Preventing misuse
- Protecting our business and customers

4.3 Legal Obligations

Including:

- Ofcom requirements
- HMRC requirements
- PCI-DSS compliance
- Emergency services routing
- Regulatory reporting

4.4 Consent

Used only for:

- Marketing communications
- Optional features (e.g., call recording where consent is required)

You may withdraw consent at any time.

5. Categories of Processors We Use

We work with carefully selected third-party providers who process data on our behalf. These include:

- **Hosted Voice & UCaaS Providers**
- **Contact Centre & CX Platforms**
- **Connectivity & Broadband Providers**
- **Mobile Network Operators**
- **Payment Processors & PCI-DSS Platforms**
- **Cloud Service Providers**
- **CRM & Billing Platforms**
- **IT Management & Security Tools**
- **Fraud Prevention Systems**
- **Porting & Number Management Providers**

We do not allow processors to use personal data for their own purposes.

6. International Transfers

Some processors may transfer data outside the UK. Where this occurs, we ensure appropriate safeguards are in place, including:

- UK International Data Transfer Agreement (IDTA)
- UK Addendum to EU Standard Contractual Clauses
- Adequacy decisions
- Additional technical and organisational measures

7. Data Security

We implement robust security measures including:

- ISO27001-aligned controls
- PCI-DSS Level 1 compliant processing (via third-party platforms)
- Encryption
- Access controls
- Monitoring and logging
- Secure configuration
- Staff training
- Incident response procedures

8. Data Retention

We retain personal data only as long as necessary for the purposes collected.

Typical retention periods include:

- **Call Detail Records (CDRs):** 12–24 months
- **Call recordings:** 30 days to 7 years (depending on service)
- **Billing data:** 6 years
- **Porting data:** 12 months
- **Payment data:** per PCI-DSS requirements
- **Support tickets:** duration of contract + 3 years
- **CRM data:** duration of contract + 6 years
- **ITMS logs:** 30–180 days

9. Marketing & PECR Compliance

We may send marketing communications where:

- You have purchased services from us (soft opt-in), or
- You have provided consent

You may opt out at any time.

We do not share data with third parties for their own marketing.

10. Your Rights

You have the right to:

- Access your data
- Correct inaccurate data
- Request erasure
- Restrict processing
- Object to processing
- Request portability
- Withdraw consent
- Complain to the ICO

We may request identification to verify your request.

11. Changes to This Policy

We may update this Privacy Policy from time to time. The latest version will always be available on our website.

12. Contact Us

For queries or to exercise your rights:

Data Protection Officer Email: DPO@firstcomeurope.co.uk