Privacy Policy

Amendment History:

Version 8	5 July 2019	Approved / released version

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2   Who are we?

Sesui Ltd offer cloud-based contact centre and telephony solutions to a wide range of clients, enabling them to operate in a more flexible, profitable and productive manner. Based in Oxford, Sesui Ltd operates within hosted network locations within the UK and has operating arrangements with all the main UK Carriers.

3   Why do we have a Privacy Policy?

We have developed this policy because we want our existing and potential clients to feel confident about how we store and use the personal information we collect through normal business engagements. Sesui Ltd is registered with the Information Commissioners Office and as an ISO27001 certified company, the protection of your personal data (data that can identify a living individual) and the prevention of unauthorised access to that data are of the highest importance to us.

4 What does the privacy policy cover?

Our privacy policy covers how Sesui Ltd handles your personal information. The policy covers personal information obtained through:

- An enquiry made to obtain information from our website (sesui.com) or by speaking with a Sesui Ltd employee;
- Telephone or email contact made to discuss a new service opportunity;
- Telephone or email contact made to discuss an existing service;
- Registering (via a consent form) for more information, having made initial contact at a conference / seminar or exhibition;
- The normal operation of our call management functionality, supported by a service contract;
- The normal operation of the Sesui App to make and receive telephone calls.

5 Information that we collect

We will ask for information that enables us to provide a service or service information to you or your organisation – we are likely to collect this information by telephone, letter, tender or RFP documentation, consented request for information documentation, email or through an information request via our website. The information we collect may include name, business address, contact telephone numbers and email address. We **will not** ask for or collect any Bank account details or credit card details, other than those covered below under credit card services (1) and to facilitate the payment of supplier, partner and sub-contractor invoices. Any financial information collected to enable such out payments is securely stored on the Sesui Ltd finance system.

Once you become a user of Sesui Ltd services and you make a telephone call (either via our cloud-based services or via the Sesui App), or send a fax that uses our email-to-fax service we will keep a record of that call, including the called number, irrespective of whether the call is successful or fails for any reason.

We capture information relating to how long or how frequently you use our services (call durations) and may use this information for invoicing for contracted services.

If you become a user of Sesui Ltd services and contract for call recording services, we will record the calls you specify and store the associated audio files securely on our operational platforms for the period specified in your service contract and thereafter on transportable and encrypted media stored in a secure location for the duration of the contract or as otherwise instructed. For Health clients we have an additional level of security by restricting access to audio files, stored on our operational platforms, to users accessing over NHS Digital network connections, otherwise known as the HSCN Network.

If you become a user of Sesui Ltd services and contract for (1) credit card payment services card data is processed by Sesui Ltd PCI Level 1 systems, using a 'token' exchange to identify card details with the payment processor. The 'token' and not the actual card details, is populated in the company CRM database meaning that the sensitive card details are only stored on the payment service provider's highly secure PCI-DSS compliant systems.

If you become a user of Sesui Ltd services we will create and store login information for you and your users to access the services for which you have contracted. This information will allow you and your users to access telephony management services and stored management information. All login activity is password protected and after initial service setup / initial user change, password details are no longer visible to Sesui Ltd personnel with access control passed to individual user accounts.

When connecting to the Sesui website (sesui.com) we may collect information relating to your IP address and the type of browser being used for access.

6 Do we share your information with anyone else?

We will share your information when formally requested to do so by:
- Regulatory agencies – e.g. OFCOM;
- Emergency Services – e.g. Police, Fire & Rescue, Ambulance related to the detection of crime, the apprehension or prosecution of offenders or related to emergency situations either historical or active;
- Agencies tasked with safeguarding national security.

We may also share your information with a Marketing Agency partner; to facilitate the marketing and communication work they do on our behalf with new or existing clients who have consented to receive information from us. A formal agreement exists between Sesui and our partner agency and this reflects Data Controller (Sesui Ltd) and Data Processor (Agency Partner) responsibilities and accountabilities. The agreement defines how the provided data may be used; how that data must be stored and protected; for how long the data can be retained and what needs to happen to the data once the retention period expires. For any client who notifies us that they wish to opt-out or give notice that they are removing consent to be contacted, they will have their data removed from both Sesui and Agency Partner systems. The data shared will be specific to Sesui and limited to the client name; a registered contact for the client and a business email address for the client contact.

We **do not** share your information with any other commercial organisations.

7 How long do we store your personal information?

We only retain your personal information for the duration of the service contract period, until receipt of a formal request to destroy any or all information, or for 12-months whichever is the longest.

We do not store, process or transmit for storage or processing any personal information outside of the UK.

At any time you may submit a formal access request to confirm what personal information Sesui Ltd hold about you and subsequently request that the personal information held be destroyed and / or modified as required. You may also restrict the processing of your personal data that we hold; request the move, copy or transfer of your personal data to alternative IT environment; object to the processing of your personal data for specific reasons (please refer to the Information Commissioners Office website for further details) and have the right not to be subject to any decisions based on automated processing.

8 How do we use the information we collect?

We use the information we collect from all our services to provide, support, maintain, protect and improve service delivery to new and potential clients, for the purposes of accurate invoicing, for the investigation of disputes and to expand the Sesui Ltd client base through securing new contracts.

Sesui Ltd does not sell personal information to any individual or organisation. Any information, purchased by Sesui Ltd, for marketing purposes is limited to contact details at an organisational level and does not contain details about personnel employed by that organisation.

9   Cookies Policy

9.1   What are cookies and why do we use them?

Cookies are small text files placed on your device when you visit a website or application. Your web browser then sends these cookies back to the website on each subsequent visit so that things like preferences can be remembered. Cookies enable a user to:

- Move more efficiently between web pages;
- Remember the preferences you may have set during a previous web site visit;
- Hopefully receive a better experience when connecting to our web site.

Cookies come in two flavours – session cookies and persistent cookies. As the term suggests, session cookies only remain until you close your online session and close your browser. Persistent cookies, again as the term suggests, remain on your device for the period defined within the cookie.

9.2   You do have a choice

Your first visit to our web site will set your preference level and we will comply with this level during all subsequent visits initiated from that device. From your browser you can further manage cookies and any settings stored on your device. In addition to the cookies listed further down this section, we also use a cookie to remember the preferences you choose when accessing our web site. Please bear in mind that the preferences you choose are device specific – so if you use different devices you will need to update your preferences.

9.3   The cookies we use

The cookies used on our website fall into one of three categories: strictly necessary, analytical / performance and functional.

9.3.1   Strictly necessary cookies

These are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our site.

9.3.2   Analytical / performance cookies

These allow us to recognise and count the number of visitors and see how many visitors move around our website when they are connected. This helps us to improve the way our site operates - for example, by ensuring that users are finding what they are looking for easily.

9.3.3   Functionality cookies

These are used to recognise you when you return to our site. This enables us to personalise our content for you and remember your preferences – for example, your choice of language or region.

9.4   Individual cookie information

- GOOGLE
    - _GA, _GID, _GTM All used to distinguish users
    - _GA expires after 2-years
    - _GID expires after 24-hours
- ACT-ON
    - WP398086
    - This expires after 1-year unless manually cleared
    - Sets cookie tracking if form submissions, click-throughs are accessed
- ZENDESK
    - This expires after 1-year unless manually cleared

o   Enables 'live chat' communication

9.5   Managing cookies

There are ways you can control and manage cookies on your device. Please remember that any settings you change will not just affect the cookies we use. These changes will apply to all websites you visit (unless you choose to block cookies from particular sites).

Managing cookies in your browser
Most browsers will allow you to choose the level of privacy settings you want. You can block all cookies or accept all cookies or pick a setting somewhere in between. This range lets you control your cookie settings, so you can:

- See what cookies you've got and delete them on an individual basis
- Block third party cookies
- Block cookies from specific sites
- Block all cookies from being set
- Delete all cookies when you close your browser

Deleting cookies means that any preference settings you have made on a website will be lost. If you've set your preferences to opt out of cookies, this setting will be lost too, as that information is stored in a cookie. Blocking all cookies means functionality on our websites will be lost, as described above. We don't recommend turning all cookies off when using our websites. If you wish to reduce your cookie settings at any time – for example, if you accept all cookies but later decide you don't want a certain type of cookie – you'll need to use your browser settings to remove any third party cookies dropped on your previous visit.