

# Sirus Ltd

## Call Recording Policy

### 1. Introduction

Sirus Limited has a telephone system capable of recording conversations. Like many other organisations, this is a standard practice that allows the recording of telephone calls for contractual, quality, compliance, monitoring, training and safeguarding purposes.

All calls received into the General Enquiries, Engineering and Sales Teams are recorded and will be retained as per our Data Retention Schedule found in our Data Protection Policy. These recordings will only be used for the purposes specified in this policy.

The call recording facility is automated and accommodates incoming calls received from outside the company and external calls being made by members of staff. If calls are transferred to a team that does not have call recording on their phones, the call recording will cease to act once the call is successfully transferred, but will continue if it is transferred to any of the teams identified above. If the call comes in to a non-call recorded phone and then is transferred to one that is, the staff member will seek consent from the caller that their call may be recorded.

### 2. Purpose of this call recording policy

In order to maintain high standards and protect our customers, public and staff we believe we need to record telephone calls received into the above mentioned teams and retain them for a very limited period of time and for a very limited number of reasons.

We shall ensure that the use of these recordings is fair and that we comply with the requirements of the relevant legislation. This includes:

- The European General Data Protection Regulation (GDPR);
- The Data Protection Act 1998;
- The Human Rights Act 1998;
- The Regulation of Investigatory Powers Act 2000;
- The Telecommunications (Lawful Business Practice) (Interception of Communications Regulations) 2000;
- Privacy and Electronic Communications Regulations 2003;

### 3. Scope of policy

Whilst calls made will be recorded they will always be securely encrypted and stored. Under normal circumstances a call will not be retrieved or monitored from secure storage unless:

- It is necessary to investigate a complaint;
- To accurately verify contractual arrangements including orders and instructions from customers and suppliers.
- To provide and prove industry regulatory control standards have been met and in relation to the company's quality standards and policies
- There is a threat to the health and safety of staff or visitors or for the prevention or detection of crime;
- It is necessary to check compliance with regulatory procedures.
- It is for safeguarding purposes.

#### **4. Collecting information**

Personal data collected in the course of recording activities will be processed fairly and lawfully in accordance with the current Data Protection Act and the European General Data Protection Regulation. It will be:

- Adequate, relevant and not excessive
- Used for the purpose(s) stated in this policy only and not used for any other purposes;
- Accessible only to managerial staff after securing permission from the Head of department;
- Treated confidentially;
- Stored securely and not kept for longer than absolutely necessary and will be securely destroyed once the issue in question has been resolved.
- No sensitive personal information will be recorded.
- Personal information collected will be limited to names, business addresses, email addresses and telephone numbers. Any other such information will be securely and irrevocably deleted immediately.

#### **5. Advising callers that calls are being recorded**

Where call recording facilities are being used we will inform the caller that their call is going to be recorded in accordance with the purposes of this policy so that they have the opportunity to give consent by continuing with the call or terminating the call. There is a recorded message in place to inform callers that their call is being recorded.

#### **6. Procedures for managing and releasing call recordings**

- Any recordings shall be stored securely with access to the recordings controlled and managed by the Data Protection Officer team.
- Access to call recordings will only be given to those senior managers as necessary.
- Individuals requesting access to their call recordings will be dealt with as a SAR. Please refer to our Data Protection Policy for information regarding Subject Access Requests.
- Every individual has the right to access the information that we hold about them. This includes recorded telephone calls. Therefore recordings will be stored in such a way to enable the Data Protection Officer team to retrieve information relating to one or more individuals as easily as possible