

**OCCAM**

Razor Privacy Policy

Status	Document Owner	Classification	Version	Date
Published	Liam O'Reilly	Internal	3.0	22/03/2023

Change Notes	Changed by	Version	Status	Date
Draft version		0.1	Retired	2018
Major revision	Chris Sibley	1.0	Retired	2018
Major revision	Liam O'Reilly	2.0	Retired	2020
Major revision, additional of SMS Compliance, Sub-Processor list	Liam O'Reilly	3.0	Published	22/03/2023

Contents

1.	BACKGROUND.....	3
2.	DEFINITIONS AND INTERPRETATION.....	3
3.	INFORMATION ABOUT US.....	3
4.	WHAT DOES THIS POLICY COVER?.....	4
5.	YOUR RIGHTS.....	4
6.	WHAT DATA DO WE COLLECT?.....	4
7.	HOW DO WE USE YOUR DATA?.....	5
8.	HOW AND WHERE DO WE STORE YOUR DATA?.....	6
9.	DO WE SHARE YOUR DATA?.....	6
10.	WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?.....	6
11.	HOW CAN YOU CONTROL YOUR DATA?.....	7
12.	YOUR RIGHT TO WITHHOLD INFORMATION.....	7
13.	HOW CAN YOU ACCESS YOUR DATA?.....	7
14.	OUR USE OF COOKIES.....	7
15.	SMS COMPLIANCE.....	9
16.	CONTACTING US.....	9
17.	SUB-PROCESSORS.....	10
18.	CHANGES TO OUR PRIVACY POLICY.....	11

1. BACKGROUND

Occam Networks understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this and all subdomains of [occam.global](https://www.occam.global) (“our sites”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of our Privacy Policy is deemed to occur upon your first use of our sites. If you do not accept and agree with this Privacy Policy, you must stop using our sites immediately.

2. DEFINITIONS AND INTERPRETATION

In this Policy, the following terms shall have the following meanings:

- **“Account”** means an account required to access and/or use certain areas and features of our sites;
- **“Cookie”** means a small text file placed on your computer or device by our sites when you visit certain parts of our sites and/or when you use certain features of our sites. Details of the Cookies used by our sites are set out in section 13, below;
- **“Cookie Law”** means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
- **“personal data”** means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to us via our sites. This definition shall, where applicable, incorporate the definitions provided in the UK General Data Protection Regulation (“UK GDPR”) and the EU Regulation 2016/679 – the General Data Protection Regulation (“EU GDPR”);
- **“we/us/our”** means Occam Networks Ltd, a limited company registered in England under company number 10302957, whose registered address is 5 Yeomans Court, Ware Road, Hertford, Hertfordshire, SG13 7HJ, United Kingdom.

3. INFORMATION ABOUT US

Our sites are owned and operated by Occam Networks Limited, a limited company registered in England under company number 10302957, whose registered address is 5 Yeomans Court, Ware Road, Hertford, Hertfordshire, SG13 7HJ, United Kingdom.

VAT number: 266 357 772.

Our Data Protection Officer (DPO) is Chris Beeson, and can be contacted by email at cbeeson@occam.global, by telephone on +44 (0)800 756 6955, or by post at 5 Yeomans Court, Ware Road, Hertford, Hertfordshire, SG13 7HJ, United Kingdom.

4. WHAT DOES THIS POLICY COVER?

This Privacy Policy applies to the use of our sites and services managed by Occam Networks Limited. Our sites may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites, and we advise you to check the privacy policies of any such websites before providing any data to them.

5. YOUR RIGHTS

As a data subject, you have the following rights under the EU GDPR, which this Policy and our use of personal data have been designed to uphold:

- The right to be informed about our collection and use of personal data;
- The right of access to the personal data we hold about you.
- The right to rectification if any personal data we hold about you is inaccurate or incomplete.
- The right to erasure – i.e., the right to ask us to delete any personal data we hold about you.
- The right to restrict (i.e., prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organization);
- The right to object to us using your personal data for particular purposes; and
- Rights concerning automated decision-making and profiling.

If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 16, and we will do our best to resolve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office (ICO).

For further information about your rights, please contact the [ICO](#) or your local data regulatory office.

6. WHAT DATA DO WE COLLECT?

Depending upon your use of our sites and services managed by Occam Networks Limited, we may collect some or all of the following personal and non-personal data.

- Name;
- Business/company name;
- Job title;
- Contact information such as email addresses and telephone numbers;
- Demographic information such as postcode, preferences, and interests;
- IP address;
- Web browser type and version;
- Operating system;
- A list of URLs starting with a referring site and your activity on our sites and services.

7. HOW DO WE USE YOUR DATA?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times.

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data (e.g., by subscribing to emails), or because it is in our legitimate interests.

Specifically, we may use your data for the following purposes:

- Providing and managing your account;
- Providing and managing your access to our sites and services;
- Personalising and tailoring your experience on our sites and services;
- Supplying our products and services to you (please note that we require your personal data to enter into a contract with you);
- Personalising and tailoring our products and services for you;
- Replying to emails from you;
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by following the instructions provided in the emails or contacting us directly);
- Market research;
- Analyzing your use of our sites and services and gathering feedback to enable us to continually improve our sites, services, and your user experience;
- Complying with legal obligations and requirements;
- Protecting the security and integrity of our sites and services.

With your permission and/or where permitted by law, we may also use your data for marketing purposes, which may include contacting you by email, telephone, text message, and/or post with information, news, and offers on our products and services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the EU GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will, therefore, be retained for the following periods (or its retention will be determined on the following bases):

1. Personal data used to provide you with products and services will be retained for the duration of the contract, plus an additional period of time to comply with legal requirements and limitations.
2. Personal data used for marketing purposes will be retained until you opt-out or request deletion.
3. Any other data will be retained for as long as is necessary to fulfil the purpose for which it was collected or as required by law.

8. HOW AND WHERE DO WE STORE YOUR DATA?

We retain your personal data only for the duration necessary to provide our services, and/or as long as we have your consent to store it. Your information is processed and stored across the UK, EU, US, and AU, with our sub-processors detailed below.

Prioritizing data security, we implement robust measures to safeguard and secure the data collected through our platforms and services. These measures include contractual agreements, technical controls such as training and awareness, encryption, vulnerability and penetration testing, and multi-factor authentication to ensure the utmost protection of your data.

9. DO WE SHARE YOUR DATA?

We may share your data with other companies in our group for the purposes of providing and improving the products and services offered to you.

We may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, or a governmental authority.

10. WHAT HAPPENS IF OUR BUSINESS CHANGES HANDS?

We may, from time to time, expand or reduce our business, and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data that you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part, and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us.

If any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted, you will be given the choice to have your data deleted or withheld from the new owner or controller.

11. HOW CAN YOU CONTROL YOUR DATA?

When you submit personal data via our sites or services, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details and/or by contacting us directly).

12. YOUR RIGHT TO WITHHOLD INFORMATION

You may access certain areas of our sites without providing any data at all. However, to use all features and functions available on our sites, you may be required to submit or allow for the collection of certain data.

You may restrict our use of Cookies. For more information, see Section 14.

13. HOW CAN YOU ACCESS YOUR DATA?

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable for reasonable requests, and we will provide all applicable information in response to your request free of charge. Please contact us for more details at dpo@occam.global or using the contact details below in section 16.

14. OUR USE OF COOKIES

Our sites may place and access certain first-party Cookies on your computer or device. First-party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of our sites and to provide and improve our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data are protected and always respected.

By using our sites, you may also receive certain third-party Cookies on your computer or device. Third-party Cookies are those placed by websites, services, and/or parties other than us. Third-party Cookies are used on our sites for advertising and analytical purposes.

Before Cookies are placed on your computer or device, you will be shown a pop-up form requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of our sites may not function fully or as intended.

Certain features of our sites depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section, but please be aware that our sites may not function properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

The following first-party Cookies may be placed on your computer or device:

Name of cookie	Category	Purpose	Strictly necessary
Necessary Cookies:			
cookielawinfo-checkbox-necessary	Necessary	Records user consent for cookies in the "Necessary" category	Yes
cookielawinfo-checkbox-functional	Necessary	Records user consent for cookies in the "Functional" category	Yes
cookielawinfo-checkbox-performance	Necessary	Stores user consent for cookies in the "Performance" category	Yes
cookielawinfo-checkbox-analytics	Necessary	Records user consent for cookies in the "Analytics" category	Yes
cookielawinfo-checkbox-advertisement	Necessary	Records user consent for cookies in the "Advertisement" category	Yes
cookielawinfo-checkbox-others	Necessary	Stores user consent for cookies in the "Others" category	Yes
Functional Cookies:			
visitorId	Functional	Identifies a user	No
__cf_bm	Functional	Supports Cloudflare Bot Management	No
chatlio_	Other	Support/ web chat	No
Analytics Cookies:			
ga*	Analytics	Stores and counts page views	No
_ga	Analytics	Calculates visitor, session, and campaign data and tracks site usage for the site's analytics report	No
_gcl_au	Analytics	Experiments advertisement efficiency of websites using Google Tag Manager services	No
Other Cookies:			
test_cookie	Advertisement	Determines if the user's browser supports cookies	No

Our sites use analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our sites is used. This, in turn, enables us to improve our sites and the products and services offered through it. You do not have to allow us to use these Cookies, however whilst our use of them does not pose any risk to your privacy or your safe use of our sites, it does enable us to continually improve our sites, making it a better and more useful experience for you.

The analytics service(s) utilised by our sites employ Cookies to collect the necessary information.

In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party Cookies. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access our sites more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

15. SMS COMPLIANCE

Our SMS communications adhere to all relevant laws, regulations, and industry standards, including but not limited to the Telephone Consumer Protection Act (TCPA) and the Cellular Telecommunications and Internet Association (CTIA) guidelines. Before using our service, we encourage users to review the Razor Monitoring Alert Profile (SMS) document for a comprehensive understanding of our practices.

We will not share any mobile information with third parties or affiliates for marketing or promotional purposes. Excluding text messaging originator opt-in data and consent, we ensure that such information will remain confidential and will not be shared with any third parties.

16. CONTACTING US

If you have any questions about our sites or this Privacy Policy, please contact us by email at dpo@occam.global, by telephone on +44 (0)800 756 6955 or by post at 5 Yeomans Court, Ware Road, Hertford, Hertfordshire, SG13 7HJ, United Kingdom. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

17. SUB-PROCESSORS

The following is a compilation of the sub-processors we collaborate with:

Sub-Processor	Data Subjects	Processing Purpose	Data Processed	Data Location/s
Amazon Web Services	Employee, customers, and customers of our clients; prospects	Cloud infrastructure provider (servers, databases, storage). Data stored in AWS is processed, stored, and archived to facilitate contracted services	Contact details, correspondence, potentially our clients' customer data	EU/ US
IBM	Employee, customers, and customers of our clients; prospects	Cloud infrastructure provider (servers, databases, storage). Data stored in AWS is processed, stored, and archived to facilitate contracted services	Contact details, correspondence, potentially our clients' customer data	US
Microsoft (Office 365)	Employee, customers, and customers of our clients; prospects	Email, SharePoint, prospecting, document storage for performance of a contract	Contact details, correspondence, potentially our clients' customer data	UK/EU
DropBox	Employee, customers, and customers of our clients; prospects	Document and file storage for performance of a contract	Contact details, correspondence, potentially our clients' customer data	US
DataDog	Employee, customers, and customers of our clients; prospects	Reporting/ Systems analytics.	Output logging information. Examples of data contained within the logs: <ul style="list-style-type: none"> - Company name - Source and Destination telephone numbers - Call ID's 	EU
Xero	Employees and customers of our clients; prospects	Invoicing and accounting platform. Required for performance of contract.	Contact, bank, and financial information. Sub-processed as necessary for payments.	EU

Sub-Processor	Data Subjects	Processing Purpose	Data Processed	Data Location/s
HubSpot CRM	Employees and customers of our clients; prospects	Cloud based customer relationship management system. Required for performance of contract.	Contact details, responsibilities, correspondence	EU
HelpScout	Employee, customers, and customers of our clients; prospects	Cloud based customer support/ Helpdesk. Required for performance of contract.	Contact details, correspondence, potentially our clients' customer data	US
Twilio	Employee, customers, and customers of our clients; prospects	Communications API	Contact details	US
Google Analytics	Website visitors	Website engagement tracking	IP address, activity	US

18. CHANGES TO OUR PRIVACY POLICY

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our sites, and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our sites following the alterations. We recommend that you check this page regularly to keep up to date.