

# PRIVACY & DATA PROTECTION NOTICE

## VOIPHUB TECHNOLOGIES LIMITED

Effective Date:

### 1. Introduction

VOIPHUB TECHNOLOGIES LIMITED (“VOIPHUB”, “Company”, “we”, “us”, “our”) is committed to ensuring that personal data is processed lawfully, fairly and transparently in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

This Notice explains how we collect, use and protect personal data in the course of our B2B telecommunications and wholesale traffic operations.

VOIPHUB does not engage in consumer-facing retail telecommunications services.

### 2. Nature of Our Operations

VOIPHUB operates as a B2B telecommunications and technology company providing:

- wholesale voice traffic routing
- inter-operator settlements
- telecommunications infrastructure services

The Company primarily processes business contact data in the context of corporate relationships.

VOIPHUB does **not** process end-user call content data and does not engage in behavioural profiling, data monetisation, or resale of personal data.

### 3. Data Controller

VOIPHUB TECHNOLOGIES LIMITED acts as a data controller in relation to business contact and administrative data processed in connection with its operations.

Registered Office: Dept 4552, 1st Floor 211 Dumbarton Road, Mansfield Park, Glasgow, G11 6AA, Scotland, United Kingdom  
Email: [privacy@voiphub.com](mailto:privacy@voiphub.com)

## 4. Categories of Personal Data Processed

We may process the following categories of data:

### **Business Contact Data**

- Name
- Business email address
- Business telephone number
- Job title
- Company affiliation

### **Contractual & Operational Data**

- Correspondence records
- Contract-related documentation
- Transactional settlement information (B2B context only)

### **Compliance & Regulatory Data**

- Identification data where required for AML/KYC screening
- Corporate documentation provided by counterparties
- Sanctions and regulatory screening results

VOIPHUB does not process special category data unless legally required.

## 5. Legal Basis for Processing

We process personal data under the following lawful bases:

- Article 6(1)(b) UK GDPR – performance of a contract
- Article 6(1)(c) UK GDPR – compliance with legal obligations
- Article 6(1)(f) UK GDPR – legitimate interests in conducting lawful B2B telecommunications operations

Where required, data may also be processed to comply with:

- AML regulations
- sanctions screening obligations
- telecommunications regulatory requirements

## 6. AML, Sanctions & Regulatory Screening

As part of our regulatory risk management framework, VOIPHUB may conduct compliance screening of counterparties and authorised representatives where required by applicable law.

Such screening is proportionate, risk-based and conducted solely for regulatory compliance purposes.

## 7. Data Sharing

Personal data may be shared only where necessary with:

- Banks and Electronic Money Institutions (EMIs)
- Payment service providers
- Professional advisers (legal, tax, audit)
- Regulatory authorities where legally required

We do not sell or commercially trade personal data.

## 8. International Transfers

Due to the international nature of telecommunications services, personal data may be transferred outside the United Kingdom.

Where such transfers occur, they are protected by appropriate safeguards, including:

- Standard Contractual Clauses (SCCs)
- Adequacy Regulations
- Equivalent lawful transfer mechanisms under UK GDPR

## 9. Data Retention

We retain personal data only as long as necessary:

- Contractual data – up to 6 years
- Accounting and financial records – up to 10 years
- AML and regulatory records – in accordance with applicable legal requirements

Data is securely deleted or anonymised when no longer required.

## 10. Data Security

VOIPHUB implements appropriate technical and organisational measures to protect personal data, including:

- restricted access controls
- encryption where appropriate
- secure data storage environments
- internal compliance procedures

## 11. Your Rights

Under UK GDPR, data subjects have the right to:

- Access personal data
- Rectify inaccurate data
- Request erasure (where applicable)
- Restrict processing
- Object to processing
- Lodge a complaint with the Information Commissioner's Office (ICO)

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

Requests may be submitted to: [privacy@voiphub.com](mailto:privacy@voiphub.com)

## 12. Automated Decision-Making

VOIPHUB does not engage in automated decision-making or profiling that produces legal or similarly significant effects.

## 13. Changes to This Notice

We may update this Privacy Notice periodically to reflect regulatory developments or operational changes.

The latest version will always be available on our website.