

Cloud Services Privacy Notice

ComputerTalk is committed to protecting personal data in accordance with applicable privacy laws. This [Cloud Services Privacy Notice](#) applies to ComputerTalk Technology Inc. and ComputerTalk Global Corp. and explains how customer personal data is collected, processed, stored, and protected in the delivery of our cloud services.

Who We Are

ComputerTalk is a Canadian company providing enterprise-class contact center solutions and Interactive Voice Response (IVR) technologies via its proprietary ice software platform. Each ice Contact Center is unique and configured to meet the specific needs of our clients, ensuring their organizational requirements are fully addressed.

What Data We Collect

Customer personal data may be collected or entered into the system by the Customer, acting as the Data Controller. This may include:

- Contact information (e.g., name, email address, phone number)
- Connection or technical data (e.g., IP address, device ID)
- Contact records (e.g., voice, chat, email, or other media channels, as directed by the Customer)
- Other personal data that the Customer chooses to include within the services following their configuration or use of the platform

ComputerTalk does not intentionally collect sensitive personal data unless required to provide services or instructed by the Customer.

How We Collect Your Data

Data is collected through interactions with the Customer's solution or through other means provided by the Customer. This may include end users, customer agents, or system integrations. ComputerTalk processes data strictly in accordance with the Customer's instructions and contractual obligations.

How We Use Your Data and the Legal Basis for Processing

Processing is based on fulfilling contractual obligations and legitimate business interests, including:

- a) **Service Management and Operation:** Authorizing staff or agents to access the services via the iceAdministrator interface.

- b) **Statistics and Reporting:** Providing statistical data on contact patterns to help the Customer manage operations, track interactions, and monitor endpoints.
- c) **Service Tracking and Contact Management:** Enabling users to search and follow up on previous interactions based on the contact originator or destination.
- d) **Customer-Driven Archival Requirements:** Retaining complete records of contact interactions for periods specified by the Customer to fulfill legal or operational requirements.
- e) **Support and Troubleshooting:** Using carrier data to troubleshoot voice quality and messaging connectivity issues to facilitate and improve our services.

How We Store Your Data

ComputerTalk stores customer data in data centers located in Canada and the United States. Data is retained within the region selected for the Customer's deployment to meet applicable data residency requirements. Data will only leave the hosting region to provide services, comply with legal obligations, or as directed by the Customer.

All third-party processors are vetted and contractually obligated to comply with data protection requirements. ComputerTalk implements robust technical and organizational measures to safeguard data and complies with applicable data protection laws, including the General Data Protection Regulation (GDPR), the Personal Information Protection and Electronic Documents Act (PIPEDA), and the California Consumer Privacy Act (CCPA).

How Long Do We Retain Your Data

Customer data is retained only as long as necessary to meet contractual obligations or legal requirements. Retention policies include:

- **Call Recordings** – 90 days
- **Screen Recordings** – 15 days
- **Chat and Email Interactions** – 365 days
- **Transcriptions and Summarization** – 365 days

All retention intervals can be adjusted according to customer needs. Once a retention period expires, ComputerTalk follows industry-standard procedures for securely deleting obsolete or unnecessary data.

Within 30 calendar days of service termination, all associated Customer data, including websites, configuration files, and other solution components, is securely deleted unless the Customer provides alternative instructions.

Who We Share Your Data With

ComputerTalk does not access or use Customer data except as required to provide services or as instructed by the Customer. We do not disclose Customer data to third parties unless compelled by law or in response to a valid legal order (e.g., subpoena or court order).

We may transfer data to our affiliates or carefully vetted service providers to perform limited functions, such as customer support. These entities are granted access only to the data necessary to fulfill their specific tasks and are subject to contractual obligations requiring confidentiality and compliance with data protection laws.

Your Data Protection Rights

Every user is entitled to the following rights under applicable data protection laws:

- a) **Right to Be Informed:** You have the right to be informed about what personal data is collected, how it is used, how long it will be retained, and whether it will be shared with third parties.
- b) **Right of Access:** You have the right to request access to the personal data that ComputerTalk holds about you.
- c) **Right to Rectification:** You have the right to request that ComputerTalk correct or update any personal data that is inaccurate or incomplete.
- d) **Right to Erasure (Right to Be Forgotten):** You have the right to request that ComputerTalk delete your personal data under certain circumstances.
- e) **Right to Data Portability:** You have the right to request that the personal data we hold about you be transferred to another organization or provided directly to you, where technically feasible and under certain conditions.
- f) **Right to Object:** You have the right to object to ComputerTalk's processing of your personal data under certain circumstances.
- g) **Rights Related to Automated Decision Making and Profiling:** You have the right not to be subject to decisions based solely on automated processing, including profiling, where such decisions significantly affect you.

Requests to exercise any of these rights should be sent to dataprivacy@computer-talk.com. ComputerTalk will review and respond to such requests in accordance with applicable data protection regulations.

Changes to Our Privacy Notice

We regularly review and update this privacy notice to ensure accuracy and transparency. Updated versions will be posted on our website. We encourage customers to review this notice periodically.

Data Protection Officer

ComputerTalk's Data Protection Officer is Jennifer Sutcliffe, who oversees our data protection strategy and compliance. Questions or concerns regarding personal data can be directed to dataprivacy@computer-talk.com.

How to Contact ComputerTalk

If you have any questions about this privacy notice, or about the collection, storage, or processing of your personal data, or if you wish to exercise any of your data protection rights, you may contact us at:

- **Email:** dataprivacy@computer-talk.com
- **By Phone:** 905-882-5000
- **Address:** Computer Talk Technology Inc., 150 Commerce Valley Drive West, Suite 800, Markham, Ontario, Canada, L3T 7Z3

We review and respond to all inquiries in accordance with applicable data protection laws and strive to address all requests promptly.