

Gamma™ Privacy Policy for ZOHO™ Phonebridge integration

1. For the Gamma™ personal data processing for the purpose of the ZOHO™ Phonebridge integration service, apply the Special Conditions and Specific Conditions of the Gamma™ CENTREX communications service and the Gamma™ Special Conditions for the integration with ZOHO™ Phonebridge to which the Client adheres.

At the time of applying for registration and contracting the integration service, the Client authorises Gamma™ to share with ZOHO™ the necessary data relating to the communications made for the proper completion and correct operation of the added functionalities resulting from the Gamma™ integration service with ZOHO™ Phonebridge and consisting of, where applicable, data relating to call events and data such as time, origin, destination, result (answered, not answered, duration of the call), and call recording and/or transcription. The Client shall have the right to withdraw his/her consent to the processing of traffic data at any time.

2. Once said data has been provided to ZOHO™, given that the Client is in turn a client of ZOHO™, the Privacy Policy of ZOHO™ accessible at <https://www.zoho.com/es-xl/privacy.html?lb=es-xl> shall be applicable. The Client, by virtue of the conditions contracted with ZOHO™ and where it has agreed with ZOHO™ to host its information, is responsible for informing, in accordance with the Client's privacy policy, the data owners, if there is an international transfer of data outside the European Economic Area.

The Client guarantees that it complies with the personal data protection regulations in relation to the data that may be communicated to Gamma™ by virtue of contracting the integration service and specifically, the Client must comply with its obligations of lawfulness. Therefore, it is the Client's responsibility, in accordance with its own privacy policy, if it decides to incorporate sensitive or personal data into the ZOHO™ Software, with express indemnity for Gamma™.

In the process of integrating the Gamma™ service, ZOHO™ shares with Gamma™ the Client's name and email address and necessary service information as a ZOHO™ Client which we will process in accordance with the Gamma™ Privacy Policy.

3. For Gamma™ the Clients privacy and users is important, and for this reason Gamma™ applies the following principles when processing personal data:

Principle of lawfulness: The processing of personal data always requires a legal basis.

Principle of transparency: All data subjects must be able to understand the processing of their personal data.

Purpose limitation principle: The purposes for which personal data are processed must be clearly identified in advance and defined at the time of collection. Consequently, personal data shall be collected for specified, explicit and legitimate purposes and shall not be further processed in a way incompatible with those purposes.

Principle of data minimisation: Personal data undergoing processing shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

- Accuracy principle: Personal data must be kept accurate and complete and kept up to date. Reasonable steps should be taken to erase, correct, supplement or update data that are inaccurate, incomplete or out of date.
- Principle of limitation of the retention period: Personal data should only be retained for as long as is strictly necessary for the purpose of the processing or as permitted by other legal regulations.
- Principle of integrity and confidentiality: In the processing of personal data, appropriate technical and organisational measures must be taken to protect the data appropriately, in particular against unauthorised or unlawful processing, accidental loss, accidental destruction or damage.

Information on the Gamma™ Privacy Policy can be found at www.gammacom.es.

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