

Telephone privacy notice

Which calls does this refer to?

Incoming and outgoing telephone calls at **MDDUS** may be recorded or monitored. A pre-recorded message or a prompt by the adviser, will let the caller know their call may be recorded. Where calls made to or from MDDUS are not recorded, this is because they are made through a telephone line that does not support recording, or when recording is not available or is not activated. This privacy notice primarily relates to calls intended to be recorded or monitored.

Why are calls recorded or monitored?

We record or monitor calls for **training, quality and administrative purposes**; in line with common business practice and to help us provide a professional service. It is not something that we are required to do, nor something we offer as a service.

Training and quality purposes means it will help with staff training and development, allow us to assess customer satisfaction and gain a better understanding of their requirements. It will also help promote and review call quality, and is a mechanism to ensure call quality assurance and to assess service delivery.

Administrative purposes means where a recording is available, we may additionally use it to support the investigation of a complaint, concern or issue raised, where it can corroborate something already noted on an electronic record. For staff wellbeing and safety, recordings also provide some assurance in those instances where they may feel intimidated or threatened. We also use call statistics for reporting, to help manage our services and systems. For example, anonymised counts of calls per week.

Data protection obligations

We **process** all personal data following data protection law and data protection good practice. The primary legal basis for processing personal data which includes recording and monitoring calls, is for 'entering into and carrying out a contract'. This means as a current, prospective or previous member - we need to maintain a certain amount of information about you related to our services. Additionally for 'special category' and sensitive personal data - such as health, safeguarding or offending history - our legal bases are 'reasons of substantial public interest' and 'establishment, exercise or defence of legal claims'. Please refer to our main privacy notice [here](#) for full details of how we process personal data.

We **retain recordings** no longer than is necessary. The retention period on our telephone system is 12 months and 90 days on our telephone desktop app. However depending on purpose, it may be longer.

For the purpose of training, a recording will be retained for as long as they are suitable for this purpose. Typically no more than about 25 short training recordings are retained, stored as separate secure files, and their contents removed of sensitive data and personal identifiers removed or minimised.

For the purpose of quality assurance, a selection of calls are regularly reviewed and some retained (outside the telephone system) for an additional month for auditing purposes. This means that potentially a retained call from the system could be up to 12 months old, then additionally retained for another month, making retention potentially up to 13 months for auditing purposes.

Administrative purposes relate to a case or legal claim, a complaint related to a case or claim, or safeguarding (someone at risk of harm). In limited circumstances, a call recording is retained within a case file until the case is removed or deleted, which is normally ten years after its closure date.

The **right of access** includes call recordings. You may request a recording via dpo@mddus.com. However please note, anything significant from a call will be noted and recorded in our internal database. This means a call recording will not normally hold anything additional to our existing electronic records.

The **right to erasure** for call recordings may be requested. However this is not an automatic or absolute right, and we would have to consider if a recording may need to be retained. For example, for training and quality purposes, we would endeavour to remove recordings relating to you when requested; but where retained for administrative purposes, we may need to keep a recording.

We **inform** callers that calls will be recorded or monitored. This privacy notice is published and available on our website. For details of data protection at MDDUS, please refer to our main privacy notice [here](#).

Confidentiality and call processing

At MDDUS we record confidential information relating to membership in a secure internal database, and it remains our primary source of member information. Anything significant discussed on a call is entered or typed into our secure database. Call recordings are not transcribed, they are only used and retained

for the reasons detailed above. Call recordings where retained, are processed by RingCentral, a separate secure telephone system. The telephone system in contrast to our database, is not designed or used as a repository for confidential information. Both systems are secure and have controlled access, and are subject to organisational and technical controls to ensure information is secure and remains confidential. Where a call is recorded, it is done automatically by our telephone system and remains securely stored within it. The recordings are confidential and access is controlled and limited. Designated MDDUS managers, compliance officers and limited technical staff have access to retained recordings; also where auditing features are used within the system, there is a clear record where access has been made. Live call monitoring is limited and specific, and only used by designated MDDUS managers: It is done strictly for training and quality purposes, typically to support staff inductions and internal team training.

Requesting not to record or monitor a call

Where you are advised a call may be recorded or monitored, you can tell the adviser before starting a conversation that you do not want it recorded. As detailed in this privacy notice, they will mention that recordings are done automatically, and may also explain the purpose of call recording and monitoring. In most instances where you have objected, your call will not be retained nor monitored. However as detailed under administrative purposes, there may be instances where we will need to retain a recording. Likewise after a call, you can tell the adviser and in most instances the recording will not be retained.

Sharing externally

For exceptional or specific limited reasons, we may need to share a retained call recording outside MDDUS. This could be instigated by us relating to our training, quality and administrative purposes; or from an external request where we are legally obliged to respond. For training and quality, a call recording used for these purposes would have personal and sensitive information minimised or reduced where possible, and the external agency we have contracted bound by a non disclosure agreement or similar agreement of confidentiality. For example, a customer service consultancy company reviewing the quality of our call handling may review a limited number of call recordings. Administrative or legal purposes could involve safeguarding or in response to a court order requiring disclosure. In general, all personal data processed by MDDUS, including retained call recordings, remains confidential and within MDDUS. Any external sharing will be limited, bound by a legal basis and security controls, assessed and documented, and where appropriate, have the consent of the data subject.

Voice messages

Sometimes a telephone line or direct dialled number will divert to voicemail. Where a voice message is left, these are not retained or extracted, and will automatically delete typically within 30 days.

Other methods of calling

Currently we do not record or retain voice, video or conference calls made outside our telephone system. These includes systems such as Zoom, WhatsApp, Skype and Microsoft Teams. If any party involved in such calls plan to include record, it is their responsibility to ensure that each participant is aware and consents, and are clear how the recording will be used and by whom, how long it will be retained and how it will be deleted. All call recording falls under data protection legal and confidentiality requirements, and processing of call recordings are bound by those obligations. Where we have instigated a call using one of these methods, such during a recruitment process or for a meeting, we will be clear if a call is being recorded and for what purpose.

Other types of calls

In addition to day-to-day business calls, there will be other types of calls to current, prospective or previous members, that relates to membership or for marketing and sales purposes. On any call, you can let us know your marketing preferences and we will make a record of your request and act accordingly. This includes opting in or out of MDDUS marketing calls or emails. Board and committee meeting calls may be recorded and are normally retained for a short period.

Further details

If you have any questions regarding this privacy notice, please contact our Data Protection Officer by email to dpo@mddus.com or by letter to the DPO, MDDUS, 206 St Vincent Street, Glasgow G2 5SG. Also please refer to <https://www.mddus.com/about-us/corporate-governance/mddus-policies/mddus-group-privacy-notice> for our full privacy notice and details of how we process personal data at MDDUS.