



# Verisure Arlo Europe DAC Call Recording Policy.

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## 1. The purpose of this Call Recording Policy

Verisure Arlo Europe DAC (“Arlo Europe”) considers it very important to continuously develop its Customer Service function by training the staff. An effective way of training the staff is to record incoming phone calls between (potential) customers and Arlo Europe. The recorded phone calls can then be used to exemplify different situations that may arise and how such situations should be handled.

Recording of phone calls constitutes an intrusion in both the (potential) customer’s and the staff member’s privacy. To minimise the intrusion and potential negative effects of such intrusion and to ensure that phone recordings are conducted, and the material is used and accessed in line with applicable laws, this Phone Recording Policy aims at setting out the framework and internal routines for the recording of phone calls and the use of as well as the access to such recordings.

The guiding principles for this Call Recording Policy are that the recording may only take place in accordance with the routines established in this policy and that the recordings may only be used for those specified purposes as determined in this Call Recording Policy. Further, access to the recordings shall be limited to those members of the staff who have a legitimate need for such access.

## 2. Purpose of recording incoming phone calls

Arlo Europe records and uses incoming phone calls for the purposes of training members of the customer service staff as well as quality assurance in order to improve the quality of our customer services and in order to ensure that the information we provide is consistent and accurate.

Phone calls may only be recorded for the purposes specified in this section 2. Any changes to the identified purposes or addition of new purposes must be approved by the Data Protection Officer of Arlo Europe. Such changes or additions in the purposes shall also be documented by updating this Call Recording Policy.

## 3. Which personal data is processed?

The recording of incoming phone calls entails that the following personal data is processed:

- The voice and information provided by the member of the staff and
- The voice and information provided by the (potential) customer.

The recorded phone calls which are used for the training purposes will be pseudonymised, which means that any direct identifiers such as your name will be removed from the recording.

## 4. Legal basis for the processing

Arlo Europe will process the personal data collected by means of recording incoming phone calls on the basis of the data subject's consent.

Arlo Europe shall ensure that the consent is freely given, specific, informed and unambiguous. When a (potential) customer calls Arlo Europe, the following information text will be read out to the data subject:

“Welcome to Arlo Europe’s Customer centre. To be able to provide you with the best possible customer service we would like to record your phone call with the customer service agent who will be assisting you. Arlo Europe will be the data controller and the recordings, which will contain personal data such as the information you provide during your phone call as well as your voice, will be used for the purpose of training our customer service agents. You have the right to withdraw your consent at any time by contacting us which will entail that we remove the recording from our systems.

More information about how we process your personal data is found in our Privacy Notice at [www.arlo.com](http://www.arlo.com).

Press 1, if you give your consent for this call to be recorded, the call will be now transferred to an agent and the recording will be initiated.

Press 2, if you do not give your consent for this call to be recorded, the call will be now transferred to an agent and the call will not be recorded.”

## 5. Information to be provided to the data subjects

Information as required by Article 13 of the General Data Protection Regulation (“**GDPR**”) is provided to the data subject in Arlo Europe’s privacy notices:

- (Potential) customers are informed via the privacy notice for Arlo Europe’s Users and Website visitors.
- The staff members of the customer service are informed via the privacy notice for Arlo Europe’s employees.

Further, this Call Recording Policy shall be made available on Arlo Europe’s website as well as in the Arlo Europe Intranet.

## 6. Access to the call recordings

The call recordings are stored securely with appropriate access limitations. Access to the call recordings is controlled and managed by Arlo Europe’s Data Protection Officer.

The Data Protection Officer will provide access to call recordings to Line Managers who are responsible for training and quality assurance.

Under the GDPR, the data subjects have a right to access to their personal data. Such access request will be handled in accordance with the internal routines for Data Subject Access Requests (“**D-SAR**”).

## 7. Retention and erasure of call recordings

The call recordings will be retained for 90 days after which they are automatically deleted by the software used for the recording. If the Customer withdraws their consent for the processing of the call recording, the recording will be erased immediately by Arlo Europe staff.

## **8. Security of call recordings**

Access to the call recordings is password protected. The Arlo Europe IT delivery team oversees the processes, policy and procedures associated with the system support used for the recording of the calls. The IT delivery team is also responsible for auditing the provider.

Any unauthorised access may lead to a consideration of disciplinary action. Browsing of recordings for no valid reason is not permitted.