

Call Recording Policy

Purpose

Safeguard uses call recording to support the effective operation of the business, maintain service standards, protect the interests of the Company, its employees and customers, and provide an accurate record of telephone communications where required.

This policy explains when calls are recorded, why recordings may be used and the responsibilities of employees when making or receiving recorded calls.

Calls That Are Recorded

Calls made or received through the UNIVERGE BLUE CONNECT telephone system are automatically recorded. This includes:

- Incoming external calls;
- Outgoing external calls; and
- Internal calls between employees where the call is made through UNIVERGE BLUE CONNECT.

Calls or conversations that do not take place through UNIVERGE BLUE CONNECT are not recorded under this system.

Employees should therefore be aware that when using UNIVERGE BLUE CONNECT, their telephone conversation may be recorded in full.

Purpose of Call Recording

Call recordings may be used for legitimate business purposes, including:

- Quality assurance and maintaining customer service standards;
- Training and development;
- Reviewing or verifying information provided during a call;
- Investigating complaints, disputes or incidents;
- Protecting employees, customers and the Company where there is disagreement regarding what was said or agreed;
- Security and fraud prevention;
- Supporting internal investigations where appropriate; and
- Meeting legal, regulatory or contractual requirements where applicable.

Recordings will not be routinely listened to for the purpose of continuously monitoring employees.

Informing External Callers

All incoming calls received through the Company's main telephone line are automatically recorded and callers will hear an automated notification advising them that the call is being recorded. Employees do not therefore need to provide any additional notification on these calls.

For **outgoing external calls made through UNIVERGE BLUE CONNECT**, there is no automated notification. Employees must therefore inform the recipient at the beginning of the conversation that the call is being recorded.

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A suitable notification is:

“Just to let you know, our calls are recorded for training, quality and security purposes.”

There is no requirement to ask the individual for consent to continue the call unless specifically instructed otherwise by management.

Internal Calls

Employees should be aware that internal calls made through UNIVERGE BLUE CONNECT are also recorded.

Employees should use appropriate alternative communication arrangements for conversations which are particularly sensitive or confidential where recording would not be appropriate.

Where employees are unsure whether a particular conversation should take place over a recorded line, they should seek guidance from management.

Access to Recordings

Access to call recordings is restricted to authorised personnel and recordings must only be accessed where there is a legitimate business reason to do so.

Employees must not access, download, copy, share or disclose call recordings unless authorised to do so as part of their role.

Recordings must not be used for personal purposes or shared with unauthorised individuals.

Data Protection

Call recordings may contain personal data and will therefore be handled in accordance with the Company's data protection obligations and applicable UK data protection legislation, including the UK GDPR and Data Protection Act 2018.

Call recordings made through UNIVERGE BLUE CONNECT are retained for **30 days**, after which they are automatically deleted in accordance with the system's retention settings.

Where a recording is required in connection with a complaint, dispute, investigation, legal matter or other legitimate business requirement, an authorised copy may be retained for longer than 30 days where necessary. Any such copy will be securely stored, access will be restricted and it will be retained only for as long as required for that purpose.

Requests from individuals for access to information contained within call recordings must be referred to management and handled in accordance with the Company's data protection procedures.

Employee Responsibilities

Employees are responsible for:

- Being aware that calls through UNIVERGE BLUE CONNECT are recorded;
- Informing recipients of outgoing external calls that the call is being recorded;
- Using the telephone system appropriately and professionally;

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- Maintaining confidentiality when discussing customer, employee or Company information;
- Not accessing or sharing recordings without appropriate authority; and
- Raising any concerns regarding call recording with management.

Compliance

Failure to follow this policy, including unauthorised access, use or disclosure of call recordings, may be dealt with in accordance with the Company's disciplinary procedures.

The Company may review and amend this policy where necessary to reflect changes in operational requirements, technology or data protection legislation.