



LUWARE'S NIMBUS Solution – to Colt Intelligent Communications (CIC)

Data Protection Sheet

This Data Protection Sheet describes the details of the personal data processing activities derived from the Luware's Nimbus Solution, a licensed cloud service solution native platform built on Microsoft Azure that provides integrated customer service features in Microsoft Teams provided by Luware and available in Colt Intelligent Communications (CIC).

Nimbus is a Luware's software-as-a-service cloud-native platform built on Microsoft Azure that provides integrated customer service features in Microsoft Teams including advanced call routing, operator consoles, contact centre functionality and compliance recording.

CIC combines productivity and enterprise communication in Microsoft Office 365 with **Colt network and voice services** including, among other elements, Luware's Nimbus.

Colt provides CIC services as a telecommunications or communication service provider to its customers ("Customers"). A telecommunications or communication service provider is company that transports information electronically through telephony and data communication services in the networking industry. Colt is also an Internet Service Provider (ISP).

Data Protection relationship

Colt provides CIC services as a telecommunications or communication service provider to its customers ("Customers") and includes in its offer the Luware's Nimbus solution together with CIC as an additional option.

For any Personal Data processed by Customer and Colt in connection with this Product, such as: (i) contact information of each Parties, (ii) any Personal Data of the signatories of the contracts executed by the parties or Personal Data provided by the Customer and (iii) Colt to execute the Contract and/or provide the Product/Service, i.e. 'Business Contact Personal Data', each party is an independent Data Controller and will comply with their respective obligations under the Data Protection Laws.

The Customer is Data Controller of the Personal Data provided to Luware to provide the Luware's Nimbus Solution. The Customer acknowledges that Luware is acting as a Data Processor for the purposes of providing the Luware's Nimbus Solution. A specific Data Protection Agreement between Luware and Customer rules such processing activity and relationship.

Data Protection Colt's Role

As a Business to Business (B2B) Telecommunication service provider, Colt processes 'Business Contact Personal Data of Customer's personnel' as personal Data Controller for the execution of the contract with the Customer for administration purposes, to comply with certain legal compliance obligations (tax, etc.) including the ones requested as a Telecom Service Provider.

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Legal basis and purposes of the Personal Data processing

Contract Execution	Execution of the contract between Colt and Customer, for administration purposes.
Legal obligation	Legal obligations, such as regulatory, legal interception, accountability, commercial and tax obligations
Legitimate Interest	Ensure the security of the network

Categories of Personal Data processed and type of Personal Data

Business contact data (Job title, name, last name, ID number, company phone number, company mobile number, company email, signature) for administration purposes.

Categories of data subjects

Colt and Customer's employees contact data for administration purposes.

Duration of the Processing

Personal data is retained no longer than the minimum time needed to comply with tax and legal obligations and enforce our Service agreements, according to legal, tax and statutory requirements specified under the applicable laws and regulations.

Locations where personal data is processed and stored

Organizations with authorized access to Customer's Personal data	Storage location	Access location	Legal Measures (BCRs, DPA, SCC, Privacy Statements, etc)
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Colt Group	Several countries globally. Colt servers are located in the UK & EU (Netherlands/Frankfurt).	Several countries globally.	European Binding Corporate Rules (BCRs) as Controller and Processor
Luware	Depending on the Customer's location. Luware's Nimbus hosted in Germany, the UK and Switzerland Microsoft Azure instances.	Depending on the Customer's location.	Privacy Policy Luware https://luware.com/en/privacy-policy/ https://luware.com/en/agreements/dpa/ .

Colt used Sub-processors (third party suppliers)

Colt does not use other third-party suppliers apart from Luware when offering Luware's Nimbus Solution for CIC.

Luware's Nimbus Solution for CIC is provided by Luware to Customer embedded as an add on to Colt CIC Product. Luware has implemented a Data Processing Agreement to be executed between the Customer and Luware (<https://luware.com/en/agreements/dpa/>).

Legal measures and statements

Colt complies with the transparency principle mainly through its publicly available Data Privacy Statement .
Colt processes as an independent controller of Business Contact Personal Data of Customer's personnel in compliance with data protection rules and within the terms described in Colt Compliance Statement
Colt has embedded the Privacy by Design and by Default principle , incorporating it into the data processing activities of Colt
Colt has been awarded EU Binding Corporate Rules ('BCRs') certification for both controller and processor. Colt's BCR Controller and Processor decisions are published at the European Data Protection Board ('EDPB') website and at the Spanish Data Protection Authority ('AEPD') website . In addition, Colt's UK Binding Corporate Rules (Controller and Processor BCRs) were approved by the UK Information Commissioner's Office (ICO) in February 2025. BCRs are a certification granted by the EDPB, the collective body of all European Union ('EU') Data Protection Authorities. Through the BCRs, the EDPB certify that the privacy program implemented by a company is compliant with the GDPR and the same level of data protection compliance valid in Europe is applied all over the entities of the same group. In addition, the BCRs are a tool for safely transfer personal data outside the EU within a group of companies.
Colt has achieved ISO 27701:2019 , an extension of ISO/IEC 27001 and ISO/IEC 27002 for Privacy and Personal Data. This Global standard provides the framework for organizations looking to put in place a system to support compliance with the EU's GDPR, California's CCPA, and other data privacy requirements. ISO 27701, also referenced as PIMS (Privacy Information Management System), outlines a framework for Personally Identifiable Information (PII) Controllers and PII Processors to manage data privacy.
Cot Technology Spain has been awarded by the highest level of the Spanish Nacional Security Scheme Certification (ENS) to ensure access, confidentiality, integrity, traceability, authenticity, availability and preservation of the data, information and services used by electronic means that they manage in the exercise of their competences Royal Decree 311/2022

Certifications

SL No	Certification	Name	Link
1	ISO/IEC 27001:2022	Information Security Management	https://www.colt.net/why-colt/certifications
2	ISO 9001:2015	International Quality Management System	
3	ISO/IEC 20000-1:2018	Service Management	
4	ISO/IEC 14001:2015	Environmental Management	
5	ISO/IEC 22301:2019	Business Continuity Management	
6	Cyber Essentials	Cyber Essentials	
7	ISO 27701:2019	An extension of ISO/IEC 27001 and ISO/IEC 27002 for Privacy	

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