

# Colt IP Access

## Data Protection Sheet

This Data Protection Sheet describes the details of the personal data processing activities derived from Colt IP Access (the “Service”).

Colt IP Access is a dedicated Internet Access product that offers high performance for all modern enterprise applications, including Access to cloud based services/ SaaS and SDWAN. IP Access is available in bandwidths up to 100gbps and supports several business class features such as Dual Access and wireless backup. IP Access comes with guaranteed bandwidth and a competitive set of SLAs and is suitable for time- and mission critical applications. The service is based on Colts own Internet backbone AS8220, one of the bestconnected networks in Europe which offers short network delays to all important destinations.

The Service is provided directly by Colt 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 - Colt's Role

For this Service, Colt as a Telecommunication Services Provider considers itself as an **independent Data Controller** as defined by Article 4 (7) of the GDPR, as it ‘determines the purposes and means of the processing of personal data’.

As a Business to Business (B2B) Telecommunication service provider, 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.

### 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 data | Storage location                                                 | Access location                                                                           | Legal Measures (BCRs, DPA, SCC, Privacy Statements, etc.)            |
|-------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| Colt Group                                            | Colt servers are located in the UK & EU (Netherlands/Frankfurt). | Several countries globally. Local contract country plus Service Centers in Spain & India. | European Binding Corporate Rules (BCRs) as Controller and Processor. |

## Colt used Sub-processors (third party suppliers)

Colt does not use third-party suppliers, different than Local Telco Operator providers, when needed, according to Telco regulations.

## 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     | <a href="#">ISO/IEC 27001:2022</a>   | Information Security Management                             | <a href="https://www.colt.net/why-colt/certifications">https://www.colt.net/why-colt/certifications</a> |
| 2     | <a href="#">ISO 9001:2015</a>        | International Quality Management System                     |                                                                                                         |
| 3     | <a href="#">ISO/IEC 20000-1:2018</a> | Service Management                                          |                                                                                                         |
| 4     | <a href="#">ISO/IEC 14001:2015</a>   | Environmental Management                                    |                                                                                                         |
| 5     | <a href="#">ISO/IEC 22301:2019</a>   | Business Continuity Management                              |                                                                                                         |
| 6     | <a href="#">Cyber Essentials</a>     | Cyber Essentials                                            |                                                                                                         |
| 7     | <a href="#">ISO 27701:2019</a>       | An extension of ISO/IEC 27001 and ISO/IEC 27002 for Privacy |                                                                                                         |

Updated : December 2025

