

Colt CPE Solutions – to connectivity services,

Data Protection Sheet

This Data Protection Sheet describes the details of the personal data processing activities derived from Colt Customer Premise Equipment (CPE) Solution (the “Solution”) execution.

Colt CPE Solutions are an add-on to **IP or other Connectivity Services**, such as, Colt Ethernet Line and Colt IP Virtual Private Network (IP VPN). It provides Customers with an integrated, managed, network solutions based on routers and switches in conjunction with Colt’s connectivity products.

CPE Solutions are 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 providers (ISPs).

Data Protection Colt’s Role

For this Solution, 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, Colt processes ‘Business Contact Personal Data of Customer’s personnel’ for the execution of the contract with the Customer from pre-contractual to post-termination stages, to comply with certain legal compliance obligations (tax, etc) including the ones requested as a Telecom Service Provider (legal interception).

Legal basis and purposes of the Personal Data processing

Contract Execution	Execution of the contract between Colt and Customer, including pre-contractual commercial relationship (prospect campaigns, marketing), contractual relationship (contracts, Master Service Agreements, General Terms and Conditions, negotiation, signature, order management, invoicing and billing, CRM, product/service provision (installation, delivery, activation, maintenance, troubleshooting, customers portals (e.g. Colt On Line), incident management, quality management) and post-contractual relationship (credits and collection, CRM, marketing)
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).

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Categories of data subjects

Colt and Customer's employees using or managing the Product/Service or the contractual relationship who are natural persons.

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	Several countries globally.	Colt Service delivery and support teams located in India, the EEA and/or the UK	European Binding Corporate Rules (BCRs) as Controller and Processor

Colt used Sub-processors (third party suppliers)

Colt does not use third-party suppliers for CPE Solutions delivery other than Other Local Telco Operator providers, when need, to provide the Services.

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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