



mi hub

Telephone Call Recording Policy

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Policy Statement

Mi Hub UK Limited has a telephone system in that is capable of recording conversations.

This is a standard industry practice that allows the recording of telephone calls for the fulfilment of our contractual obligations, for quality monitoring, training, compliance, and security purposes.

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Scope

In-bound and outbound calls received into Customer Services and Credit Control may be recorded and retained in accordance with defined retention periods. These recordings will only be used for the purposes specified in this policy.

If calls are transferred from Customer Services or Credit Control to a member of staff outside of these departments, the call recording will cease once the call is successfully transferred.

Definitions

- **Purpose** – We will limit the reasons why telephone call recordings can be retrieved or monitored to specific reasons. These are:
 - It is necessary to investigate a complaint
 - It is part of a management checks to ensure that customer service quality standards are being met through call evaluations
 - For the prevention or detection of crime
 - It is necessary to check compliance with policies and procedures
 - It will aid standards in the call handling though use in training and coaching of our staff
 - Any other purpose will be considered on a case by case basis by the Head of Risk and Compliance
- **Refusal** - If it becomes clear that the customer making the call does not wish to have their call recorded the advisor dealing with the call will provide the customer with alternative means of communication such as email and postal address and the call recording will be stopped and call terminated.
- **Information** – The type of information we will collected will be processed lawfully and fairly. It will be:
 - Adequate, relevant, and not excessive. Data collected may include but is not limited to: name, address, job title, telephone number, email address and gender.
 - All calls, where the caller provides details of a payment card for the purpose of making a payment, will only be partially recorded. In order to comply with Payment Card Industry Security Standards (PCI DSS), all operators will suppress call recordings whilst financial information is disclosed thus ensuring that no financial information is recorded.
 - All calls, where the caller provides other special category of personal information will only be partially recorded. All operators will suppress call recordings whilst information is disclosed thus ensuring that no special category of personal information is recorded.
 - Used for the purposes stated in this policy only and not used for any other purpose
 - Accessible only to managerial staff after securing permissions through authorised channels
 - Treated confidentially
 - Stored securely
 - Not kept for longer than necessary and will be securely destroyed once issues in question have been resolved.
- **Access** – Access to call recordings will be limited to supervisors, Senior Management and Human Resources on a case by case basis. Staff members personally involved in the call may request their call. Supervisors in the Customer Services and Credit Control Teams will listen to recordings to provide feedback and coaching or where a customer or staff member highlights a complaint.
- **Destruction** – All call recordings are automatically deleted within one year, unless:
 - The call recording forms part of a complaint. In this case the call recording will be kept until the complaint is closed and the expiry date for appeals expires.

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- The call recording is identified as a valuable training tool. In this case the call recording will be kept until the training is complete.
- There is a legal requirement to keep the call recording, for example when used as evidence of a crime. In this case the call recording will be kept until the legal obligation expires.
- There is a contractual obligation to keep the recording. In this case the recording will be kept until the contractual obligation expires.

- **Storage** - All call recordings are made using 3rd Party telephone system and stored in storage devices managed by our internal IT Department.

Procedures

Documented procedures are in place for the teams using call recordings to ensure they comply with this policy.

Policy Compliance

Any employee, contractor or third-party found to have violated this policy may be subjected to disciplinary action in line with HR Policy.

Responsibilities

- **Head of Risk and Compliance** – Responsibility for the review and updating of this policy.
- **Head of IT Operations** – Responsibility for providing a secure system to record and monitor calls.
- **Head of Customer Operations** – Responsibility for the appropriate processes, training, usage and monitoring of this policy with the Customer Service Teams.

Monitoring

Internal audits of the process will take place to ensure this policy has been adhered to.

Related Policies and Documents

- Data Protection Policy
- PCI DSS Compliance Policy