

Privacy Policy for the CANCOM Calleague App

The protection of your personal data is very important to us. We want you to feel secure when using our Calleague app. Therefore, we place great emphasis on transparency in the processing of your personal data and provide you with this Privacy Policy to inform you about how we handle your data and your rights.

This Privacy Policy describes how CANCOM Austria AG (hereinafter referred to as “we,” “us,” or “our”) processes data on behalf of the data controller in connection with the provision of the Calleague app.

The data controller within the meaning of the GDPR is the company that grants its employees access to the app and activates it, for example, via Microsoft Entra ID. We ensure that your data is protected in accordance with applicable data protection regulations, in particular the GDPR and the DSG, and is processed only for the intended purposes.

1. Name and contact details of the data processor

CANCOM Austria AG

Wienerbergstraße 53, 1120 Vienna, Austria

T +43 50 822 0

info@cancom.com

c/o Data Protection Officer

Wienerbergstraße 53, 1120 Vienna, Austria

datenschutz@cancom.com

2. Nature and Purpose of Data Processing

The following personal data is processed in connection with the use of the Calleague solution:

- Identification data: e.g., username, email address (provided via Microsoft Entra ID)
- Contact data:
 - Company contacts are retrieved via the Microsoft Graph API using the /users endpoint.
 - The user's personal contacts, which they have saved in their Outlook account, are processed via the /me/contacts endpoint.
- The processing distinguishes between company contacts from Microsoft Entra ID and the user's personal contacts.
- Storage on the End Device: The contacts processed within the app are stored exclusively locally on the end device and placed in a separate section or contact group within the Contacts app to ensure a clear separation from existing contacts.
- Connection data: Phone numbers of incoming calls for identification via the company's contact database.
- Error logging: For technical error analysis, error messages may be logged in a local log file on the end device. These logs remain exclusively on the end device and are not automatically transmitted to CANCOM. Transmission occurs only if the user actively and voluntarily sends the log file to CANCOM (e.g., as part of a support request).

- Local data storage: All contacts processed by the app are stored exclusively in encrypted form on the end device (SQLite with end-to-end encryption); CANCOM does not store any data on its servers.

The purpose of data processing is to provide a feature that allows internal company calls to be recognized and assigned to the correct employee - even if their number is not stored in the local address book. The app thus supports efficient internal communication.

Data processing is identical both during regular use of the app and during a limited-time trial period (e.g., 30-day trial version).

3. Legal Basis for Processing

The processing of personal data for these purposes is based on Art. 6(1)(b) of the GDPR (performance of a contract or implementation of pre-contractual measures). Art. 6(1)(b) of the GDPR also applies during the trial period, as the trial serves the purpose of enabling future use and thus constitutes a pre-contractual relationship.

4. CANCOM's Obligations as a Data Processor

We undertake to process personal data only in accordance with the documented instructions of the controller. Furthermore, we take all necessary measures in accordance with Article 32 of the GDPR to ensure the protection of personal data. We ensure that all persons authorized to process data are bound by confidentiality and strictly maintain this confidentiality. Upon completion of the contractually agreed services, we will either delete or return all personal data in accordance with the controller's instructions. Furthermore, we assist the controller in fulfilling its obligations under Articles 32 through 36 of the GDPR to ensure that all data protection requirements are fully met.

5. Recipients of the Data

Personal data will only be disclosed to third parties upon instruction from the controller or if required by law. The app processes all contact data locally on the end device; no data is transferred to external servers or providers.

6. Data security

We take appropriate technical and organizational measures to ensure the confidentiality, integrity, and availability of personal data. These measures are designed to ensure the security of the data we process and to minimize the risk of data loss, unauthorized access, misuse, or disclosure.

- Access control: Only after admin approval via Microsoft Entra ID
- Data encryption: Contacts are stored in encrypted form on the device
- No server processing: Contact data is not stored on servers
- Data sovereignty: Users can delete all stored data themselves.

7. Data Protection Rights of Data Subjects

Data subjects have the right to access, rectify, erase, and restrict the processing of their personal data, as well as the right to data portability and to object. Requests regarding these rights should be directed to the data controller.

8. Changes to this Privacy Policy

We may change or update parts of this Privacy Policy for technical or legal reasons without prior notice to you. Please review the current Privacy Policy to stay up to date on any changes or updates.

9. Contact Us

If you have any questions about this Privacy Policy, please contact us at datenschutz@cancom.com.