



INTEGER WEALTH GLOBAL

POLICY DOCUMENT – 20240123/01

Call Recording Policy

23 January 2024

1. Purpose

The purpose of this policy is to govern the procedures for Microsoft Teams and/or telephone call recording within Integer Wealth Global (the Company), and the management of access to, and use of, the recordings. The policy aims to minimize intrusion by restricting the recording of calls, the access to, and use of these recordings to limited and specific purposes.

2. Scope

One of the key aspects of call recording law in the UK is the requirement for businesses to obtain the consent of all parties involved before recording a call. The consent must be freely given, specific, informed, and unambiguous, and individuals must be made aware that the call is being recorded.

To ensure compliance with the consent requirement, the Company should implement a clear and concise notification at the beginning of the call, informing all parties that the call may be recorded for specific purposes. This notification should also provide individuals with the option to decline having their call recorded if they do not wish to give their consent.

3. Principles and Legislation

Under the [Data Protection Act 2018](#), call recording is classified as the processing of personal data, and as such, the Company must comply with the principles outlined in the legislation. These principles include the requirement to process personal data lawfully, fairly, and transparently, and to only collect and use personal data for specified, explicit, and legitimate purposes.

Additionally, the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 also play a significant role in governing call recording in the UK. These regulations outline the circumstances in which call recording is permitted and provide guidance on the consent and notification requirements.

When operating in the financial services industry, the Company must comply with the Financial Conduct Authority (FCA) rules on call recording. These rules require the Company to record all telephone conversations relating to client orders and the conclusion of transactions in the financial markets.

Call recording in the UK is governed by a series of regulations and legislation that aim to ensure the protection of individual privacy rights and maintain fair business practices.



The primary legislation that regulates call recording is the Data Protection Act 2018, which incorporates the General Data Protection Regulation (GDPR) into UK law. Integer Wealth Global is committed to adherence of all applicable laws and regulations in this regard.

The recording and monitoring of telephone calls is affected by several items of legislation, in particular:

- Human Rights Act 1998
- Data Protection Act 2018 (GDPR)
- Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (LBP Regulations)
- Telecommunications (Data Protection and Privacy) Regulations 1999
- Payment Card Industry Data Security Standards (PCI DSS)
- ICO Employment Practices Code

4. Recording Information

Integer Wealth Global utilize the Microsoft Teams communication system which is capable of recording calls.

Although all calls may not be automatically recorded, it should be assumed that they are.

5. Purpose of Call Recordings

Calls are recorded and retained for the following purposes:

- To monitor the quality of call handling and client service and to ensure the information we provide is consistent and accurate.
- Staff training, coaching and support
- To verify what was discussed within the call should a dispute or complaint arise
- To protect staff from abusive behaviour
- To verify the client's agreement during certain service requests
- Calls may also be used as evidence within an investigation should a misconduct, performance, or capability concern arise.
- To verify the details of the call for the purposes of, or in connection with, any legal proceedings

6. Retention and Storage of Call Recordings

All call recordings will be retained for a period of 6 years. All recordings will be deleted after 6 years, unless retained for a specific business or legal purpose.

7. Access to Call Recordings:

Access to call recordings is controlled in line with principles under Data Protection legislation and is limited to the Chief Liaison Officer and the Executive Members of Integer Wealth Global. Should any other employees or clients of the Company require access to call recordings, permission to access must be granted by the Executive Members.

Call recordings can be obtained by Line Managers for training and quality purposes.



Specific call recordings may be accessed by Line Managers, HR or any Disciplinary Hearing Panel as evidence in relation to any disciplinary process. In these cases, requests for access must be made in writing for authorization from a Company Executive Member.

In the case of a request from an external body with law enforcement powers in connection with the prevention, detection, or investigation of crime e.g., the Police, Home Office, DWP, HMRC etc. the request must be made in writing to the Executive Members who will consider the request.

The UK Data Protection legislation allows persons access to information that we hold about them. This includes recorded telephone calls. Therefore, the recordings will be stored in such a way to enable the General Data Protection Regulations Representative to retrieve information relating to one or more individuals as easily as possible.

Any unauthorized access of call recordings may lead to disciplinary action. Browsing of recordings for no valid reason is not permitted.

8. Advising of the Call Recording Facility:

Integer Wealth Global will make every reasonable effort to communicate that calls will be recorded. This will be done by:

- Employee's informing the client/ caller when call recording facilities are being used
- Using a standardized message when a call is scheduled to inform callers that their call is being recorded
- Reminding the client/ caller that the call is being recorded should they be displaying abusive behaviour and that the calls contents may be reviewed by management
- The Call Recording Policy is published on the Integer Wealth website

9. Best practices:

Compliance with call recording laws goes beyond obtaining the necessary consent.

The implementation of best practices ensures that the company meet its obligations and maintaining a high standard of data protection.

The following are best practices implemented by the Company:

1. Regularly review and update call recording policies and procedures to reflect changes in the law.
2. Train employees on the proper use of call recording systems and the importance of data protection.
3. Implement access controls and encryption measures to safeguard recorded calls from unauthorized access.
4. Conduct regular audits and assessments to identify and address any compliance gaps.
5. Retain call recordings for the appropriate period of time - seven (7) years - and securely dispose of them when no longer needed.
6. Seek legal advice when unsure about the legality of recording calls in specific circumstances.

By following these best practices, we demonstrate our commitment to compliance and ensure the protection of individuals' privacy rights.