

Privacy Protection for Information and Data Standard



Table of contents

Change History	2
1. Purpose, scope and Users	5
2. Compliance and exceptions	5
3. Objectives	6
4. Privacy framework	6
5. Protection of records	7
6. Data collection, use, and processing	8
6.1 Collection of employee data	8
6.2 Processing of employee data	9
6.3 Retention of employee data	9
6.4 Data subject rights as an employee	9
6.5 Interactions with customer data	10
6.5.1 Fiber & Transport and Network Connectivity	10
6.5.2 Cloud services (Object Based Storage Services)	10
6.5.3 Voice services	10
6.6 Use of customer data	11
6.7 Processing of customer data	12
6.7.1 Opt-In	14
6.7.2 Payment Card Information (PCI)	14
6.7.3 Customer Proprietary Network Information (CPNI)	15
6.8 Data subject rights as a customer	15
6.9 Cross-border data transfers	16
6.9.1 Restricted transfer safeguards	17
7. Third Party data sharing and transfers	18
7.1 Customer data sharing and transfers	18
7.2 Third party data subject rights	19
7.2.1 Right to access	19
7.2.2 Right to rectification and erasure	19
7.2.3 Right to restrict or object to processing	19
7.2.4 Right to data portability	19
7.2.5 Exercising data subject rights	19
7.2.6 Verification and documentation	19
7.2.7 Right to lodge a complaint	20
8. Data retention and disposal	20



	8.1 Customer personal data	20
	8.2 Images and video recordings	20
	8.2.1 Consent	20
	8.2.2 Limit access and usage	21
	8.2.3 Secure storage and transfer	21
	8.2.4 Inform and empower individuals	21
	8.3 Network traffic	21
	8.4 Website information	21
9.	Spam	22
	9.1 Internal anti-spam measures	22
	9.2 Anti-spam requirements for external communications	22
	9.2.1 Refrain from sending unsolicited commercial electronic messages	22
	9.2.2 Compliance with anti-spam policies in other countries	22
	9.2.3 Maintain truthful information in email headers	23
	9.2.4 Identify third party services for sending CEMs	23
	9.2.5 Include contact information in commercial messages	23
	9.2.6 Including a functional return email address	23
	9.2.7 Opt-out requests	23
	9.2.8 Personal identifier, opt-out provision, and physical Address	24
	9.2.9 Make opt-out functional after messages are sent	24
	9.2.10 Unsubscribe users from opt-out notifications	24
	9.2.11 Maintain accurate identifiers	24
	9.2.12 Aggravated violations	24
	9.2.13 Refrain from misleading subject lines	24
	9.2.14 Maintain a do-not-email registry	25
	9.2.15 Refrain from address harvesting	25
	9.2.16 Prevent messages to non-existent email addresses	25
	9.2.17 Document erroneous messages	25
10	. Incident reporting and response	25
11	. Assessment and training	26
12	. Roles and responsibilities pertaining to this Standard	26
13	. Definitions	29
14	. Related documents	33
15	. Validity and standard management	33