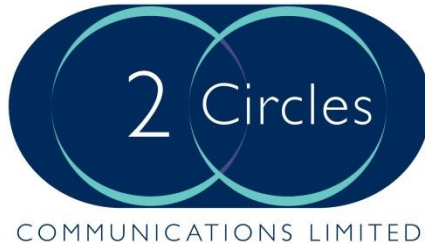


# Consumer Code of Practice



This Code of Practice is published by 2 Circles Communications Ltd (referred to as 2 Circles in this document).

The Telecommunications Services described in this Code are subject to availability and may be modified from time to time.

## About 2 Circles

2 Circles Communications Ltd are business communications specialists who provide a full range of **voice, data, and mobile services**.

Our aim is to take care of your communications whilst you get on with running your business – we provide dedicated account management to save you time and money.

We have a unique partnership with the Talk Talk Business, the business to business division of the Talk Talk Group plc. We have been working with TTB and the Talk Talk Group for the last 7 years. In this time TTB have invested in, and built, the second largest telecommunications network in the UK.

Working in partnership with the Talk Talk Group strengthens our position as one of most progressive communications providers in the country. Our dedication to service combined with our group buying power underpins our commitment to giving our customers a cost efficient service and an unparalleled positive customer experience.

## Mission Statement

To provide a complete communications solution, working in partnership with our business customers. We are passionate about delivering an exceptional customer experience by getting the simple things right.

## Contact Details

### Address:

Ver House  
23-25 High Street  
Redbourn  
Hertfordshire  
AL3 7LE

Telephone: 03456 200 200

**Email for enquiries:** [info@2circles.com](mailto:info@2circles.com)

**Website:** [www.2circles.com](http://www.2circles.com)

Should your enquiry relate to 2 Circles' Code of Practice, please contact the Operations Director at the above address or email [areid@2circles.com](mailto:areid@2circles.com).

## The Purpose of the Code

The purpose of this Code of Practice is to inform our customers of their relationship with us. It is written for Small Business customer who purchase telecommunications services from us directly. A Small Business is defined as a company having 10 employees/volunteers or fewer and is not itself a telecommunications service provider.

### This code aims to provide:

- Information on how to contact 2 Circles
- Information on sales and marketing activities
- Information on some of our main services
- Information on billing and pricing issues
- Information on how to make a complaint
- Contact details for alternative complaint bodies

## Sales, marketing, advertising and promotion

2 Circles adheres to all applicable Codes of Practice, including advertising and consumer protection regulations.

This includes the Mailing Preference Service, the Telephone Preference Service, the Fax Preference Service and the E-Mail Preference Service.

Our advertising and promotions comply with the British Codes of Advertising and Sales Promotion. We always aim to ensure that our advertising and promotional literature is clear, unambiguous, accurate and fair and that it does not contain any false or misleading information about price, value or service. We do not denigrate other providers of telecoms services.

## Range of services

The main services offered by 2 Circles to Small Business customers are described below.

### • **LLU/Next Generation Network Services**

- high speed data connection for internet or video on demand delivered through your telephone line

### • **Wholesale Line Rental**

- major savings over BT line rental

### • **Outbound Call Routing**

- up to 45% savings on calls

### • **Non Geographic Numbers (NGN)**

- 0800, 0845, 0870/1, Premium Rate, International Services

### • **Business Mobile Services**

- across all 4 major networks

### • **Business Broadband, Email, Domain & Web Hosting**

- internet made easy

### • **Hosted Exchange and BlackBerry**

- corporate communications, regardless of the size of your business

### • **SIP Trunking**

- bringing your communications together into a single unified system

- **Future Office – Hosted Telephony**

- bringing you tomorrow's telephony - today

- **Fax to Email**

- receive all faxes directly in your email inbox

- **On-line Billing**

- view and manage your company's telephony online

- **E-alerts or usage alerts**

- helps you manage use of your company's telephony

## **PRICING**

We will be pleased to provide you with our prices on request. To obtain pricing information please call us on 03456 200 200.

## **BILLING**

2 Circles Communications Ltd work on a unified, state of the art billing system, where invoices, billing reports and full itemisation are delivered each month by email.

In addition, our customers have 24/7 access to our Billing On-line feature through a secure login. This on-line management system stores a 6 month billing history, giving our customers access to their billing information via the web and the ability to run their own reports as and when they are required.

This feature gives our customers the ability to:

- Analyse their usage quickly and accurately
- Have instant access to a number of set reports on-line
- Have access to administration on-line
- Be constantly aware of costs or misuse using the E-Alerts facility, which provides a full management by exception feature - where end users can set criteria, which if met, will automatically generate an emailed report (alert)

### **Billing queries**

We take billing accuracy very seriously. If you do not understand or disagree with part of your bill, please call us on the number quoted on your bill.

You are liable for the costs of any calls that you make over our network. If you query the charge for dialled calls, we will re-check the bill. If we find a mistake you will be credited accordingly.

### **Disconnection for non-payment**

Prompt payment of bills helps us keep our costs down so that we can continue to offer a competitive service. Please call us as soon as possible if you think you may have difficulty in paying your bill. If there are special circumstances, we may be able to agree special arrangements with you to prevent disruption of your telephone service.

In the event that a bill is not paid we will make all reasonable attempts to resolve the matter with you. However, if we are unable to get a satisfactory explanation for the non-payment, or an acceptable

proposals for the payment of the outstanding amount, we may suspend or disconnect your service in accordance with our terms and conditions.

## Customer Experience

Our customer experience representatives are able to help with all your queries including products, billing and tariffs.

Where possible, we will respond to your enquiries within 2 hours. Our Customer Experience Account Managers can deal with your enquiries from Monday to Friday between 9.00 am and 5.30 pm.

If you have any service enquiries please call us on 03456 200 200.

### **Alternatively, you may write to our Head of Customer Experience at:**

2 Circles Communications Ltd  
Ver House  
23-25 High Street  
Redbourn  
AL3 7LE

Or e-mail us at [myexperience@2circles.com](mailto:myexperience@2circles.com)

### **Cancellation**

If you wish to cancel your service with 2 Circles you can do this without any cost or charges at any time up to the date the transfer to 2 Circles Communications takes place. If you exercise this right you must within 7 days of cancellation return at your own cost all equipment we provided to you unused and in its original packaging.

We advise that you do this by courier or guaranteed mail as we have no responsibility for any lost or undelivered equipment. If you do not return the equipment in this way, you can still cancel, but you will be responsible for the replacement cost of the equipment, all charges incurred and any enforcement costs (including legal costs).

To find out more about your rights to cancel period please contact us in writing, by telephone or by e-mail as set out above.

If you choose to cancel after this period, your rights and obligations are set out in your Contract. Some services take a little time to cancel, as they require us to work with special industry processes. When you cancel your service, we aim to advise you of the time period from us receiving your cancellation request to the time at which the service is withdrawn. During this period, you remain liable for the costs of any services we provide.

### **Fault Repair**

Repairing faults on our network is part of the maintenance cover we provide with our service.

However unless otherwise stated in your service agreement, engineers only attend to faults in normal working hours (Monday to Friday from 9.00 am to 5.30pm, excluding bank holidays).

### **Service Level Agreement**

#### **LEVEL 1**

***Operates during working hours (0900 - 1700 hours Monday to Friday, excluding Public and Bank Holidays).*** OPENREACH aim to respond to a fault report received before 1700 hrs on one working day by the end of the next working day +1 working day (within 72 hours)\*. Where a fault is reported outside normal working hours, the fault will be treated as if it has been reported at the beginning of the next working day. Work will only be carried out during working hours.  
*Standard on residential lines.*

## **LEVEL 2.5**

***Operates during the period 0900 - 1700 hours Monday to Saturday, excluding Public and Bank Holidays.*** OPENREACH will respond within 4 working hours of receipt of a fault report...  
OPENREACH will aim to fix the fault by the end of the next working day\*. If the fault is not cleared during this period OPENREACH will advise the Nominated Contact of the progress being made to clear the fault.

Where OPENREACH Personnel are working on a fault at the end of working hours it may be possible for work to continue without a break at the customer's request, however this will only be possible if OPENREACH Personnel are available and there may be an additional charge for such work.  
*Standard on all business lines - Analogue, ISDN2 & ISDN30.*

## **LEVEL 3**

***Operates 7 days per week: 07.00 to 21.00 Monday - Friday; 08:00 to 18:00 Saturday & Sunday (including bank & public holidays).*** OPENREACH will respond within 4 hours of receipt of a fault report. OPENREACH will fix fault the same day if fault is reported before 12:00; if fault is reported after 12:00, aim to fix by 13:00 the next day. If the fault is not cleared during this period OPENREACH will advise the Nominated Contact of the progress being made to clear the fault.

## **LEVEL4**

***Operates 7 days a week Monday to Sunday - 24 hours a day - 365 days a year.***  
OPENREACH will fix the fault within 6-hours\*.

\* Repeat/intermittent and exchange faults are excluded from set fix times.

Faults can occur on the 2 Circles Network, another operator's network, or on the telephone used by you or the person you are trying to call. If the fault is reported during normal working hours, we will try to establish the location of the fault. We may request that you carry out some simple checks to help us establish the cause of the fault.

If the fault is not on our network then we may not be responsible for its repair. If the fault is on the BT network then you may need to report this fault to BT directly. To report a BT fault call one of the following numbers.

**BT residential customers call 0800 800 151**

**BT Business customers call 0800 800 154**

We reserve the right to charge for any abortive work or visit arising from faults over which we have no control. Should an engineer need to visit your premises we will agree this with you.

## **Reconnection**

If you are a previous 2 Circles customer and wish to come back to 2 Circles, please call us on 03456 200 200 and we will aim to get you reconnected as soon as possible.

## **If you are not satisfied with 2 Circles' Customer Experience**

We are passionate about and committed to providing you with the best value telecommunications service in the UK. We understand that faults can occur, and when they do, we want to correct them quickly. We provide a comprehensive complaint handling process to solve your problem as soon as possible.

When you call us, a Customer Experience Co-ordinator will note the details of the problem and will agree a course of action with you. Due to the complex nature of some queries, these may take a little longer to resolve.

If you are not happy with the response you receive you may ask for the matter to be referred to a team leader for further investigation.

In the rare event we are unable to resolve your problem we will write to you informing you of the position. This is sometimes called the 'deadlock' letter. When you receive this letter and your annual bill is less than £5000, you have the right to refer your case to the Ombudsman.

The Ombudsman will want to ensure that you have followed this process through before contacting them. If this is not evident the Ombudsman is likely to refer the matter back to 2 Circles for resolution. 2 Circles is happy to work with other independent bodies, such as ICSTIS, Citizens Advice Bureaux, Consumer Advice Centres and Trading Standards Departments.

## **Your rights and obligations**

### **Data protection**

**We may collect personal information about you from a number of sources.**

**These may include:**

The customer agreement, i.e. the agreement that you sign when you take a service from 2 Circles.

This may include your name, address, other contract details and banking details.

- If you contact us with an enquiry
- From direct marketing organisations
- From other publicly available sources such as the electoral role

2 Circles is registered under the Data Protection Act and takes all reasonable steps to ensure that there is no unauthorised access to your personal data. We may use the personal data that we have to promote 2 Circles' products and services but these details will not be passed to any other organisations for marketing purposes.

In some circumstances we may supply information to organisations such as the police where the law permits us to do this.

**We may record phone conversations in order to provide training services or to provide evidence of a transaction.**

**If you wish to know what personal information 2 Circles holds on you, you can obtain this by writing to us.**

**Please write to the following address.**

Head of Customer Experience  
2 Circles Communications Ltd  
Ver House  
23-25 High Street  
Redbourn  
Hertfordshire  
AL3 7LE

Further information is set out in our privacy policy, which is available on our website at [www.2circles.com](http://www.2circles.com)

## Terms and Conditions

The terms and conditions on which we provide our services, are available on our website [www.2circles.com](http://www.2circles.com) or on request from your Customer Experience Account Manager. Please call 03456 200 200.

## Services for disabled and elderly customers

If you are older or may have a disability and wish to discuss any special telecommunications requirements you may have then please contact your Customer Experience Account Manager at the above address and we will try to accommodate your requirements where possible.

## Phonebook entry

If you have a BT line then using 2 Circles' IDA services will not affect your phonebook entry. In this case, you have a right to be included in the BT phonebook and directory enquiries, free of charge. You may also choose to be ex-directory.

2 Circles can arrange for your 2 Circles Non Geographic Number (NGN) e.g. 0800 to be included in the phonebook free of charge. Please contact your Customer Experience Account Manager at the number above.

## Communications with customers

It is our policy to maintain contact with our customers on a regular basis. We may call you or write to you from time to time to inform you of any new services and to review your current telecommunications requirements. If you would prefer not to receive marketing information from us please let us know.

We aim to keep this Code of Practice up to date and you may obtain a copy from your Customer Experience Account Manager or via our Website - [www.2circles.com](http://www.2circles.com)

## Social Responsibility

### Environmental policy

2 Circles is committed to the prevention of pollution. We maintain an environmental management system that is appropriate to the nature, scale and environmental impacts of our activities, products and services.

This system ensures that wherever possible:

- all waste is recycled, and where this is not practicable due to either technical or cost constraints, any waste is disposed of in an appropriate manner;
- we use energy efficient processing equipment and tools;
- company vehicles are selected and maintained correctly so as to minimise pollutant emissions;
- we schedule and combine activities in geographical areas to ensure that the effect of transportation of personnel and equipment on the environment is minimised;
- we recycle office stationery and use stationery manufactured from recycled materials wherever practicable;
- we regularly review the environmental impacts of the business, and constantly seek opportunities for continual improvement and prevention of pollution;
- we provide a framework, comprising a high level management review supplemented by a forum that meets on a regular basis, to set and review environmental objectives and targets;

### Protection and support of vulnerable groups

2 Circles Communications is predominately a supplier of communications service to business customers. We understand that some of our customers may have special needs and so require particular attention. It is our policy to assist any customers who may have difficulty using telephony services whether they have a disability or are from other vulnerable groups.



## Malicious Calls

We understand that annoyance and distress can be caused by malicious calls and take this problem very seriously. If you are receiving malicious calls, we would like assist you in trying to resolve the problem. This may involve working with the police and other network operators where appropriate. You should be prepared to give evidence if the caller is traced and brought to court. We may also recommend that you change your phone number and ask for this to be ex-directory if you continue to receive such calls.

To report any malicious calls to 2 Circles, please contact our Customer Experience Team on 03456 200 200.

## Premium Rate Services

PhonePayPlus, (formerly ICSTIS) is the premium rate services regulator.

PhonePayPlus is the industry-funded regulatory body for all premium rate charged telecommunications services. They regulate premium rate services in their entirety - their content, promotion and overall operation - through the PhonePayPlus code of practice.

The role of PhonePayPlus is to prevent consumer harm.

PhonePayPlus investigates complaints about the promotion and operation of services which involve the use of a telephone connection via a premium rate number. This includes services available on a variety of mediums such as voice (telephone), fax, Internet, mobile phone SMS and interactive TV. The potential content of these services is virtually endless.

PhonePayPlus regulates any service/promotion that is operating on one of the following number ranges:

- Numbers beginning with 090 or 091;
- Directory enquiry (DQ) services operating on numbers beginning with 118; and
- Reverse-billed SMS (you are charged for the receipt of messages) containing content operating on shortcodes. Shortcodes have 4 or 5 digits and start with either 8, 6 or 2.

PhonePayPlus has the power to fine companies and bar access to services if their code of practice is breached. PhonePayPlus can also bar the individual(s) behind a company from running any other premium rate services under any company name on any telephone network for a defined period. PhonePayPlus can deal with lesser problems by issuing formal reprimands or ordering companies to come to us for prior approval.

Their service is fully independent.

## How to complain to PhonePayPlus

If you think a particular service falls within the remit of PhonePayPlus, you can submit a complaint to them. There are a variety of ways to submit your complaint but before you do, we recommend that you visit their online number checking facility for instant information about the number in question. After that, please use one of the following methods:

If you have a hard copy of the promotion in question (i.e. a page from a magazine), please supply your complaint in writing with a copy of the promotion to: PhonePayPlus, FREEPOST WC5468, London, SE1 2BR by using their online complaint form by calling their free helpline on 0800 500 212 between the hours of 8.00am and 8.00pm, Monday to Friday. Information about our PRS tariffs

## How Premium Rate Services (PRS) works

Calls to PRS numbers are typically more expensive than calls to other telephone numbers. Most PRS numbers are operated on the basis of a revenue-sharing arrangement. This means that the bulk of the revenue from calls to such services goes to the service providers who are responsible for the



content, product or services provided or who act as resellers or aggregators on behalf of a number of such providers. The service providers are responsible for compliance with the bulk of the obligations imposed by the PhonePayPlus code of practice mentioned above.

The remainder of the revenue is shared by the consumer's "originating" telephone company (for instance 2 Circles, which receives a small fee for origination of the phone call) and the telephone company that contracts with the service provider and "terminates" the call on behalf of the service provider through the provision of network facilities.

### **How to bar access to PRS numbers**

We offer the facility to bar calls to Premium rate numbers, which will help stop any dialling on your line to all UK based 0900-0909 premium numbers. If you use other service providers, for example BT for your line rental service, then you will need to ask them to bar your calls as well. These are the numbers that are currently being used in various Internet scams. If you want to place a premium bar on your line or need to check whether you already have an active bar in place please call our Customer Experience Team on 03456 200 200.

### **Rogue Internet or Trojan dialers**

There is currently a scam that infects computers with a dial-up Internet connection. It changes the way your computer connects to the Internet and is difficult to detect.

The scam can occur when you are browsing a compliant and proper Internet services website often with premium rate content. Examples of websites that have available premium rate content to download to your computer include music, films and adult material. When you access one of these sites a message should appear asking you to install software in order to download material from the website at an explained addition cost.

When you install this software, your normal dialler will be temporarily replaced to pay for the content that you have just requested with a new dialler configuration.

### **What is a Trojan?**

A Trojan is a programme that infects your computer and allows a hacker to run hidden tasks without your knowledge or consent. The latest Trojan's can re-configure your dial up connection and charge you at a Premium or International call rate when you access the Internet and click on a seemingly harmless pop up or link. The next time you dial up to connect to the Internet you will be charged at a Premium rate or International call rate. That's the scam.

### **How to Prevent Infection**

Install the latest software to protect your computer and always obtain the latest upgrades and patches from the supplier to ensure you are protected against the latest Trojans.

Using anti-virus and Firewall protection programs will help reduce the risk of this happening. We strongly recommend that you use additional safety measures in addition to their standard anti-virus programs.

Please speak to your PC supplier for further guidance.

We also recommend that you keep your operating system patched with the latest upgrades from your software's manufacturer. For Microsoft Window users please visit <http://windowsupdate.microsoft.com> to ensure your PC settings are up to date. We are working closely with PhonePayPlus and Ofcom. Once we are told about a Trojan dialer we take all possible steps to ensure that our customers are unable to connect to this number again.

### **Disputes regarding PRS numbers on your phone bill**

The Office of the Telecommunications Ombudsman (Otel), of which we are a member, is able to investigate if you have a complaint that we cannot resolve regarding calls to PRS number appearing on your phone bill.

Furthermore, PhonePayPlus may order a PRS service provider to pay you a refund in the case they have completed an investigation and where it imposes redress as a sanction. If it can be shown that your phone has been used without your permission to call certain types of premium rate service (e.g. live and recorded chat, and live tarot services), PhonePayPlus may also be able to help you obtain compensation from the PRS service provider. PhonePayPlus will also be able to help you identify the service provider who provides the service behind the PRS number on your phone bill.

Please visit their website at [www.phonepayplus.org.uk](http://www.phonepayplus.org.uk)

### **Number Translation Services**

Our up-to-date charges for calls to number translation services (numbers starting with 05 or 08) are available from our Customer Experience team on 03456 200 200. We provide these with the same prominence as our charges for calls to other numbers (including geographic, mobile and international numbers).

Our stated charges for calls to number translation services will include variations by time of day, for example, whether the call is made during the day, evening or weekend. We also make it clear whether any of our special offers, discount schemes or call bundles include calls to number translation services.

Whenever we refer to our call pricing in our marketing material, we include our maximum number translation services call prices as well as a clear reference to our customer service advisers who can provide a complete set of our charges for calling number translation services.

If you are a new customer who signs up for the 2 Circles' service, we include on the relevant correspondence, our maximum number translation services call prices as well as a clear reference to our customer service advisers who can provide a complete set of our charges for calling number translation services.

## **Further Information**

### **Office of Communications (Ofcom)**

Ofcom Contact Centre  
Riverside House  
2a Southwark Bridge Road  
London  
SE1 9HA  
**Tel:** 0300 123 3333  
**Fax:** 020 7981 3333  
**Email:** [contact@ofcom.org.uk](mailto:contact@ofcom.org.uk)  
**Website:** [www.ofcom.org.uk](http://www.ofcom.org.uk)

### **Ombudsman Services: Communications (OTELO)**

Wilderspool Park  
Greenall's Avenue  
Warrington  
WA4 6HL  
**Tel:** 0330 440 1614  
**Email:** [enquiries@os-communications.org](mailto:enquiries@os-communications.org)  
**Website:** <http://www.ombudsman-services.org>

**PhonePayPlus**

Fourth Floor  
Clove Building  
4 Maguire Street  
London  
SE1 2NQ  
Call: 0800 500 212  
Website: [www.phonepayplus.org.uk](http://www.phonepayplus.org.uk)

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Andrew Reid  
Operations Director  
2 Circles Communications Ltd  
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Redbourn  
Hertfordshire  
AL3 7LE  
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Email: [areid@2circles.com](mailto:areid@2circles.com)  
Website: [www.2circles.com](http://www.2circles.com)