

price and value assessment.

Company Name: Circle Cloud Communications Ltd

Product/Service: Business Telecoms - Cloud Based Telephony with Asset Finance Options.

Date of Assessment 03.06.2025

Assessed/Reviewed by Jordan Evens - Commercial Director

Approved By Josie Gliddon- CFO Circle Technology Group Ltd

Product Provides Fair Value? Yes

product/service details.

circle.cloud offers credit broking service in conjunction with cloud-based telephony systems and associated equipment. The key features and benefits of these products include:

- Expert consultation on telecoms requirements
- Tailored business phone solutions including VoIP, cloud PBX, and unified communications
- Introduction to a panel of asset finance providers for finance on telecoms hardware/software
- Finance facilitated on both hard and soft assets
- Ongoing customer service, onboarding, and technical support
- Transparency around pricing and credit implications.

As part of the customer journey, circle.cloud maintains rigorous processes, including the following:

- Solution consultation and quoting
- Pre-eligibility finance screening (non-credit-impacting where possible)
- Application submission to lenders
- Facilitation of credit agreements
- Delivery and installation of equipment
- Post-sale service and issue resolution

Throughout these process all customers are given an adequate explanation of their finance options and telecom package. A standardised welcome pack, privacy notice, IDD and complaint process documentation is issued.

target market and suitability.

circle cloud's target market is UK-based SMEs including sole traders, partnerships (≤ 3 partners), and limited companies which require modern telecoms infrastructure on flexible finance terms and regulated firms in need of secure, compliant, cloud-based systems.

Within this target market suitable customers would be those that

- Are wishing to avoid upfront hardware costs and spread payments,
- Prefer managed telecoms with predictable monthly costs
- Are seeking to upgrade legacy systems or transition from PSTN/ISDN lines

vulnerable customer considerations.

Within our suitable target market there may be customers who have vulnerabilities such as:

- Limited financial literacy
- English as a second language
- Low-income or high financial pressure
- Bereavement, illness, or other temporary distress

These customers may require additional support to fully understand the product, risks, benefits and making informed purchasing decisions.

Those who experience temporary or permanent changes, including financial difficulties may face negative outcomes.

By the nature of the issues vulnerable customers face, it is less likely they will receive the best value with financial services products. circle.cloud is committed to mitigating against these likelihoods to ensure they do receive a fair value.

Additional assistance is provided to customers who require further explanation (e.g. sole traders or vulnerable customers).

To mitigate against these risks, we make sure our staff are aware of what is seen as a vulnerable customer and endeavor to have clear explanations without the jargon, in multiple communications formats (including email, phone, video and face to face) with customers. We allow extra time for decision making and when we see the signs, provide external resources information such as MoneyHelper or Business Debtline.

Our customers are made aware of what support they can expect to receive from us including:

- Access to phone and email support
- Clear escalation pathways for complaints
- Online self-service knowledge base and troubleshooting guides
- Staff trained to recognise and support vulnerable customers

We maintain a formal Vulnerable Customer Policy that our staff are trained on. This policy ensures that any team member engaging with customers is equipped to identify vulnerability indicators and provide appropriate support, escalation, or referral where necessary.

pricing.

As part of the sales cycle, customers are presented with pricing alongside our circle.cloud agreement stating monthly costs for the period of the contract term. This includes any financial costs for monthly leasing costs for hardware/software including interest chargeable as part of this arrangement.

There are no hidden administrative fees from circle.cloud or upfront charges such as required to understand and compare finance agreements or costs associated with credit searches by lenders (always disclosed).

A full breakdown is provided in writing before application with online and offline disclosures and any finance quote includes representative APR circle.cloud continues to look for ways to improve cost efficiencies to current services and where we can, improve services and offerings without significant price increases to the customer.

Any customer defaulting or who are in arrears of paying will be charged a fixed fee of £15 per invoice to cover administrative costs. circle.cloud remains the right to terminate the agreement and at such time a termination charge will be due.

circle.cloud endeavours to work closely with its customers to ensure they are not excessively in arrears and unreasonable overall costs are charged for the overall products and services provided.

Pricing for vulnerable customers follow the same principle and are not differentiated against in accordance with our vulnerable customer policy.

market comparison.

circle.cloud maintains a competitive offering in a well-established UK B2B telecoms market with added value through integrated finance.

circle.cloud is seen as a specialist in our chosen market with a dedicated financial referral process. We have a seamless equipment, financial and support model and is a member of telecoms trade bodies. A UK based support and implementation team sets us apart and externally verified as a customers' favourite with Google and Trustpilot reviews.

assessment outcome.

circle.cloud provides fair value to business customers, including regulated firms and sole traders, by delivering transparent pricing, tailored telecoms solutions, and accessible finance through a reputable lender panel.

Services offers flexibility, compliance, and support aligned with FCA guidance. Costs are transparent and proportionate with no evidence of harm or misalignment with customer needs. Vulnerable customer procedures are in place and there is ample competitive alternatives with in the market circle cloud operates in.