

**NASSTAR DATA PROCESSING SCHEDULE (COMMUNICATIONS SERVICES)**

<p><b>Notes:</b></p> <ul style="list-style-type: none"><li>Capitalised words and phrases in the table below shall have the same meaning given to them in Nasstar's Data Processing Terms e.g. CRM Data &amp; Communications Data.</li><li>"C" references where Nasstar is a Controller of the personal data and "P" references where Nasstar is a Processor of the personal data.</li><li>Nasstar uses a support service operated by its affiliate, ACT Teleconferencing Malaysia Sdn Bhd (based in Kuala Lumpur) ("Nasstar Malaysia") and it is possible that customer data may be accessed by Nasstar Malaysia in order for Nasstar Group to provide provisioning, support and maintenance services to its customers. The Nasstar Group uses European Commission approved Standard Contractual Clauses to regulate the processing of personal data by Nasstar Malaysia; as well as Nasstar's Intra Group Data Transfer Agreement and technical and organisation measures documented within the organisation's Integrated Business Management System (IBMS). The IBMS conforms to ISO/IEC 27001, 20000-1, and 9001, and undergoes annual audit.</li><li>Further to Nasstar's acquisition of the KCOM National Business on 1 August 2021, Nasstar may subcontract certain obligations under its contract with the Customer to KCOM Group Limited ("KCOM") and KCOM may continue to process the personal data of the Customer's officers, employees, agents and contractors for the purpose of</li></ul>				<p>* Refers to Nasstar products and services supported by Nasstar Malaysia. Nasstar Group also use ServiceNow and various Microsoft Office applications (e.g. Exchange (e-mail), Teams, Skype for Business) to provide support to customers. ServiceNow affiliates in the UK, US, the Netherlands, Australia, India and Singapore may access personal data for this purpose. Microsoft and ServiceNow utilise European Commission approved Standard Contractual Clauses for any non-EEA processing of personal data.</p> <p>** References to Sensitive Data shall mean Special Categories of Personal Data as set out in Article 9 of the General Data Protection Regulation 2016 and any information relating to criminal offences or convictions.</p>							
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Product/Service	CRM Data (this is the personal data of representatives with whom Nasstar interacts for marketing and customer relationship purposes)	User Data (this is focussed on a customer's end users e.g. their contact details and authentication details, among other things)	Communications Data (this will include a range of traffic and location data that Nasstar will process in order to perform certain services (e.g. number called, date/time, duration of call))	Content Data (this would cover a range of data that is processed in the provision of Nasstar services but which is created by users – ranging from video, call and email content data)	Other (incl. Sensitive Data)	Categories of data subject	Subject matter of the processing	Nature and purpose of the processing	Duration of the processing	Authorised Sub-Processors	Additional Info
Inbound Telephony Service	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communications and details of any end-users who use the Inbound Telephony Service (including end user telephone number).	Call history/log details - caller/called party data.	Interaction data i.e. records of interactions between Customer's staff and other individuals using the Service including call recordings for those Customers who use the Service's call recording facilities.	Data may include sensitive data in the form of Content Data which Nasstar employees may have access to in providing support, but it is not required or requested by Nasstar to perform the Services and Nasstar is not the controller of any sensitive data.	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies and other third parties who use the Services or are concerned with the receipt of the Customer's rights under the Contract. Any third party who uses or deals with the Service provided by Us to the Reseller.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfillment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract. Call recordings are stored for up to two years.	European Computer Telecoms (ECT)	ECT provide third line support for the platform.
Inbound Voice Services via the Advance Services Platform	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communications and details of any end-users who use or deal with the Service provided by Nasstar to the Customer (including end user telephone number).	Call history/log details - caller/called party data - and similar records for faxes.	Interactions between individuals who use the Service including call recordings and voicemail messages for those Customers who use the Service's call recording and voicemail facilities. Inbound and outbound fax is also used.	Data sent across the Advanced Services Platform may include sensitive data in the form of Content Data which Nasstar employees may have access to in providing support, but it is not required or requested by Nasstar to perform the Services and Nasstar is not the controller of any sensitive data.	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies and other third parties who use the Services or are concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfillment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract. Call recordings are stored for up to 7 days, Voicemails are stored for up to 10 days.	Telis Shout	Telis and Shout provide 4th line support for some elements of the Myriad platform that these Services relate to.
Inbound Voice (Reseller)	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communications and details of any end-users who use or deal with the Service provided by Nasstar to the Customer (including end user telephone number).	Call history/log details - caller/called party data.	Interactions between individuals who use the Service including call recordings for those Customers who use the Service's call recording facilities.	Data may include sensitive data in the form of Content Data which Nasstar employees may have access to in providing support, but it is not required or requested by Nasstar to perform the Services and Nasstar is not the controller of any sensitive data.	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties who use the Services or are concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfillment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract. Call recordings are stored for up to 2 years.	European Computer Telecoms (ECT)	ECT provide third line support for the platform.
SIP Trunking Services	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communications and details of any Customer end-users who use the Service.	MAC address or IP address, call history/log details	N/A	N/A	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties who are concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfillment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract.	Microsoft (Metaswitch) - Access to call logs ; IP address for 3rd line diagnostic purposes,	
SIP Trunking Services (Reseller)	C	P	P	P	P						

Product/Service	CRM Data  (this is the personal data of representatives with whom Nasstar interacts for marketing and customer relationship purposes)	User Data  (this is focussed on a customer's end users e.g. their contact details and authentication details, among other things)	Communications Data  (this will include a range of traffic and location data that Nasstar will process in order to perform certain services (e.g. number called, date/time, duration of call)	Content Data  (this would cover a range of data that is processed in the provision of Nasstar services but which is created by users – ranging from video, call and email content data)	Other (incl. Sensitive Data)	Categories of data subject	Subject matter of the processing	Nature and purpose of the processing	Duration of the processing	Authorised Sub-Processors	Additional Info
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communications and details of any end-users who use or deal with the Service provided by Nasstar to the Customer.	MAC address or IP address, call history/log details	N/A	N/A	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties who are concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfilment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract.	Microsoft ( Metaswitch) - Access to call logs ; IP address for 3rd line diagnostic purposes,	
SmartComms UC Service	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communications and details of Customer end-users and admins who use the Service including: Login/User ID, personal contact details (name, address, phone number, email address), calendar information, location data, usage details of communications (video/audio/messaging), call history/log details, videos, screen/file sharing data, IM content data, email content data, device IDs (IP/MAC address).	Device IDs (IP/MAC address), location data (for emergency contacts/service/ELIN - subnet and physical address information) (e.g. communication start & end time, user details (identifying from & to users), caller ID info, call details including From and To telephone numbers, technical details relating to technical quality of the communication).	Any content created by an end-user and may include audio and video recordings, IM content and email content. Voice recordings are encrypted and can only be accessed by authorised users	Data may include sensitive data in the form of Content Data which Nasstar employees may have access to in providing support, but it is not required or requested by Nasstar to perform the Services and Nasstar is not the controller of any sensitive data.	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties who use the Services or are concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfilment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract. Voice recordings if the service is used 30 days and up to 7 years if agreed with customer.	BT Wholesale Wholesale carrier of access circuits, wholesale portal business zone and business portal  Tollring - call logs with associated user info at company , site and user level	
SmartComms UC Service (Partner & Reseller)	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communications and details of end-users and admins who use the Service (including staff of the End User Customer) including: Login/User ID, personal contact details (name, address, phone number, email address), calendar information, location data, usage details of communications (video/audio/messaging), call history/log details, videos, screen/file sharing data, IM content data, email content data, device IDs (IP/MAC address).	Device IDs (IP/MAC address), location data (for emergency contacts/service/ELIN - subnet and physical address information) (e.g. communication start & end time, user details (identifying from & to users), caller ID info, call details including From and To telephone numbers, technical details relating to technical quality of the communication).	Any content created by an end-user and may include audio and video recordings, IM content and email content. Voice recordings are encrypted and can only be accessed by authorised users	Data may include sensitive data in the form of Content Data which Nasstar employees may have access to in providing support, but it is not required or requested by Nasstar to perform the Services and Nasstar is not the controller of any sensitive data.	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties who use the Services or are concerned with the receipt of the Services (including the Customer's End User Customer) or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfilment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract. Voice recordings if the service is used 30 days and up to 7 years if agreed with customer.	BT Wholesale Wholesale carrier of access circuits, wholesale portal business zone and business portal  Tollring - call logs with associated user info at company , site and user level	
Signalling Presentation	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communications and details of any Customer end-users who use the Service.	Call history/log details - caller/called party data.	N/A	N/A	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties who are concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfilment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract.		This Service is always sold / associated with another voice product (either inbound or SIP or both). The data processing characteristics will be the same as the main product
Internet Connect	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communications.	Data usage (CDRs), IP Address (stored for remote management and support), data routing information, Usage History / Log Details.	N/A	CPE IP address is used for status monitoring (C) and remote support and management (P). No sensitive data.	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties who are concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfilment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract.	Telecoms providers including BT Wholesale and TTB	
Leased Line, ethernet and Optical Services	C	P	P	P	P						

Product/Service	CRM Data (this is the personal data of representatives with whom Nasstar interacts for marketing and customer relationship purposes)	User Data (this is focussed on a customer's end users e.g. their contact details and authentication details, among other things)	Communications Data (this will include a range of traffic and location data that Nasstar will process in order to perform certain services (e.g. number called, date/time, duration of call))	Content Data (this would cover a range of data that is processed in the provision of Nasstar services but which is created by users – ranging from video, call and email content data)	Other (incl. Sensitive Data)	Categories of data subject (this will include a range of data that is processed in the provision of Nasstar services but which is created by users – ranging from video, call and email content data)	Subject matter of the processing	Nature and purpose of the processing	Duration of the processing	Authorised Sub-Processors	Additional Info
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Name, Job Title, Email, Phone, Location, IP Address, MAC address, Ticket History/Log Details	IP Address MAC address Browsing history by MAC/IP address is available to the Customer as well as location of these within a building where the LAN is available.	N/A	N/A	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties who are concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfilment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract.	Telecoms providers including <b>BT Wholesale</b> and <b>TTB</b>	
Leased Lines, Ethernet Optical Services (Reseller)	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Name, Job Title, Email, Phone, Location, IP Address, MAC address, Ticket History/Log Details	IP Address MAC address Browsing history by MAC/IP address is available to the Customer as well as location of these within a building where the LAN is available.	N/A	N/A	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties who are concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfilment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract.	Telecoms providers including <b>BT Wholesale</b> and <b>TTB</b>	
Managed Hosting Services	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communications and details of any Customer end-users who use the Service.	N/A	Any information which is hosted on Nasstar infrastructure using Nasstar's Managed Hosting Services - note that Content Data is not accessed or used by Nasstar other than to provide hosting services and any necessary support services.	Sensitive Data - individuals may share their sensitive personal data or about other users in the form of Content Data which Nasstar employees may have access to in hosting the data or in providing support, but it is not required or requested by Nasstar to perform the services and Nasstar is not the controller of any sensitive data.	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties who are concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	Collecting, storing, processing and releasing personal data for the purpose of Nasstar's fulfilment of its obligations under the Contract including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract.	<b>Abiquo</b> <b>Microsoft</b> applications are used to communicate with customers (e.g. e-mail, Skype/Teams) and some personal data may be contained within these communications. <b>Netapp</b>	
Managed WAN Services	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Name, Job Title, Email, Phone, Location, IP Address, MAC address, Ticket History/Log Details	IP Address MAC address Browsing history by MAC/IP address is available to the Customer as well as location of these within a building where the LAN is available. CLI/telephone number (ADSL monitoring)	N/A	Nasstar monitor the network for utilisation and packet loss statistics including network devices. No sensitive data	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	To fulfill Nasstar's obligations under the Contract including provision and management of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract.		
Network Connect	C	P	P	P	P						
	Business contact details (e.g. name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communications.	IP Address MAC address Browsing history by MAC/IP address is available to the Customer as well as location of these within a building where the LAN is available. CLI/telephone number (ADSL monitoring)	N/A	Nasstar monitor the network for statistics including network devices. No sensitive data	Representatives with whom Nasstar interacts for marketing and customer relationship purposes including officers, employees and agents of the Customer and its group or associated companies, and other third parties concerned with the receipt of the Services or enjoyment of the Customer's rights under the Contract.	Provision of Services pursuant to the Contract between Nasstar and the Customer.	To fulfill Nasstar's obligations under the Contract including provision and management of the Services, ensuring effective communication between Nasstar and the Customer and dealing with any rights, actions, incidents or disputes arising under the Contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract.	Telecoms providers including <b>BT Wholesale</b> and <b>TTB</b>	