NASSTAR DATA PROCESSING SCHEDULE (COMM Notes: - Capitalised words and phrases in the table below sit - 'C' references where Nasstar is a Controller of the - Nasstar use a support service operated by its afflic customer data may be accessed by Nasstar Malaysi Group uses European Commission approved Stand Group Data Transfer Agreement and technical and IBMS conforms to ISO/IEC 27001, 2000-1, and 90: - Further to Nasstar's acquisition of the KCOM Natio KCOM Group Limited ("KCOM") and KCOM Margo Limited ("KCOM") and KCOM mayor Limited ("K	hall have the same meaning given personal data and "P" references ate, ACT Teleconferencing Malaysi ia in order for Nasstar Group to pr ard Contractual Clauses to regulate organisation measures documente 11, and undergoes annual audit. nal Business on 1 August 2021, Nat	where Nasstar is a Processor of the a Sdn Bhd (based in Kuala Lumpar) povide provisioning, support and main the processing of personal data by ad within the organisation's Integral star may subcontract certain obliga	personal data. "Nasstar Malaysia") and it is possibl "Nasstar Malaysia; to its customers Nasstar Malaysia; as well as Nasstar ed Business Management System (IB ttions under its contract with the Cus	titions Data. India and Singapore ** References to Se that The Nasstar 's Intra IMS). The tomer to	e may access personal data for this		utilise European Commission appr	oved Standard Contractual Clauses i	or any non-EEA processing of perso	nal data.	mers. ServiceNow affiliates in the UK, US, the Netherlands, Australia, $\frac{1}{2}$
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	Business contact details (e.g., name, job title, company name and business e-mail address/plone number and records of correspondence/marketing) for Nasstar's Customer contact(s)) which is used by Nasstar's Group for the purpose of sending 828 marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related communication and details of any Customer 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 Masstar 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 purpose, 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 propriet of the Customer's rights under the Contract. Any third party hou user 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 Nastar'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 Nastara and the Customer and dealing with any rights, actions, incidents of 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	Business contact details (e.g. name, job title, company name and business remail address/phone number and records of remail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(s)] which is used by Nasstar's Group for the purpose of sending 828 marketing, billing and customer relationship management purposes.	P Contact details for the Customer's admin and related communication and details of any end-users who used of communication with the Service provided by Nasstart to the Customer (including end user telephone number).	P Call history/log details - caller/called party data - and similar records for faxes.	p Interactions between individuals who use the Service including call recordings and volcemal messages for those Customers who use the Service's call recording and volcemal facilities. Inhound 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 purpose including officers, employees and agents of the Customer and Iss group or associated companies and other third parties who use the Services or are concerned with the receipt of the Services or reinyment 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 Nassir's fulliment of 1st obligations under the Contract in including provision and management of the Services, maintenance of records of the Services, ensuring effective communication between Nasstar and the ustomer 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.	Telsis Shout	Tebis and Shout provide 4th line support for some elements of the Myria platform that these Services relate to.
nbound Voice (Reseller)	Business contact details (e.g., name, job title, company name and business e-mail address/phone number and records of corresponders of the corresponders of	P 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 Nassar to the Customer (including end user telephone number).	P Call history/log details - caller/called party data.	P 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 offices, employees and agents of forces, employees and agents of companies, and offices of the companies of the compan	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 virtuding provision and management exceeds of the Services, ensuring effective communication between Nasstara 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	Bosiness contact details (e.g., name, job title, company name and business email address/phone number and records of the contraction of the correspondence/marketing for Nasstar's Customer contact(s) which is used by Nasstar's Group for the purpose of sending 828 marketing, billing and customer relationship management purposes.	P Contact details for the Customer's admin and related communication and details of any Customer endurers who use the Service.	P MAC address or IP address, call history/log details	P N/A	P N/A	Representatives with whom Nesstar Interacts for make lenge and customer retains for the control of the customer of the stationship purposes and agents of the Customer and Egyptic or associated companies, and other third parties who are concerned with the reciple 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 surpose of Nassir's fulfillment of sit solitops and 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 (Metawitch) - Acess to call lags, IP address for 3rd line diagnostic purposes,	
SIP Trunking Services (Reseller)	с	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 or mail address/phone number and corosts of correspondence/marketing) for correspondence/marketing for wasstar's Customer contact(s) which is used by Masstar Group for the purpose of sending BZB 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 offices, 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 raccords of the Services, maintenance raccords and the Customer and dealing with any rights, actions, and contract.	During the Term of the Contract and for up to 7 years after the expiry or termination of the Contract.	Microsoft (Metawitch) - Acess to call logs, IP address for 3rd line diagnostic purposes,	
SmartComms UC Service	c	P	P	Р	P						
	susiness contact details (e.g. name, job title, company name and business e mail address/phone number and corrections of correspondence/maketing) for oursespondence/maketing) for Nasstar's Sustamer contact(s) which is used by Masstar Group for the purpose of sending BZB maketing, 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/Liber ID, personal contact details (name, address, phone number, email address), calendar information, location data, usage details of communications (video/aulid/mexaging), call history/log details, videos, exceen/file sharing data, ill. content data, email content data, device IDs (IP/MAC address).	Device IDs (IP/MAC address), location data for emergency contacts/service/EUIN - subvet and physical address information) and traffic data/routing information (e.g. communication start & end time, user details (identifying from & to users), caller in 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 and may include audio and video recordings. If we content and email content video recordings are 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 has star employees: may have access to in providing support, but it is not required or required or required or required proportion the services and Nasstar to perform the Services and Nasstar is not the controller of any sensitive data.	Representatives with whom Nestar interacts for maketing and custome relationship purposes including offices, 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 recipit 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 date 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, measuring 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 eapity or termination of the Contract. Voice recordings if the services used 30 days and up to 7 years if agreed with customer.	ST Wholesale Wholesale carrier of access circuits. wholesale portal business zone and business portal Toding: call logs with associated use info at company, site and user level	
SmartComms UC Service (Partner & Reseller)	c	P	P	P	P						
	susiness contact details (e.g. name, job title, company, name and business e-mail address/phone numbers and serecords of correspondence/marketingl for correspondence/marketingl for hasstar's Customer contact(s) which is used by Masstar Group for the purpose of sending 828 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/avaido/messaging), call administrations (administrations) (administr	Device IDs (PF/MAC address), location data (for emergency contacts/service/ELIN - submet and physical address information) and traffic data/routing information (e.g. communication start & end time, user details (identifying from & to user), caller Io Info, call details including From and To telephone numbers, technical defeals relating to technical quality of the communication).	Any content created by an end-user and may include audio and video 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 Nesstar instructs 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 find luser Customer's find the Customer's fights 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 expity 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 business portal Tolring - call logs with associated use 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 email address/plone number and consistence of the con	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 Nastar interacts for marketing and customer relationship purpose including a officers, mplayees and the control of the companies and companies and companies and one 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 hassar's fulfilment of its processing to the processing of the releasing provision and management of the Services, maintenance of records of the Services, records 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	Р	P						
	Business contact details (e.g. name, job title, company, name and busines e-mail address/phone number and records of correspondence/marketing) for Nasstar's Customer contact(si) which is used by Masstar Group for the purpose of sending BZB marketing, billing and customer relationship management purposes.	Contact details for the Customer's admin and related commmunications.	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						

	CRM Data			Content Data	Other (incl. Sensitive Data)	Categories of data subject	Subject matter of the processing	Nature and purpose of the	Duration of the processing	Authorised Sub-Processors	Additional Info
	CKIVI Data	User Data	Communications Data	Content Data	Otner (Incl. Sensitive Data)	Categories of data subject	Subject matter of the processing	processing	Duration of the processing	Authorised Sub-Processors	Additional Info
	(this is the personal data of	(this is focussed on a customer's	(this will include a range of traffic	(this would cover a range of data							
Product/Service	representatives with whom	end users e.g. their contact details	and location data that Nasstar will	that is processed in the provision							
Producty Service	Nasstar interacts for marketing	and authentication details, among	process in order to perform	of Nasstar services but which is							
	and customer relationship	other things)	certain services (e.g. number	created by users – ranging from							
	purposes)		called, date/time, duration of call)	video, call and email content data)							
	Business contact details (e.g, name,	Name, Job Title, Email, Phone,	IP Address	N/A	N/A	Representatives with whom Nasstar	Provision of Services pursuant to the	Collecting, storing, processing and	During the Term of the Contract and	Telecoms providers including BT	
	job title, company name and business	Location, IP Address, MAC address,	MAC address			interacts for marketing and customer	Contract between Nasstar and the	releasing personal data for the	for up to 7 years after the expiry or	Wholesale and TTB	
	e-mail address/phone number and	Ticket History/Log Details	Browsing history by			relationship purposes including	Customer.	purpose of Nasstar's fulfilment of its	termination of the Contract.		
	records of correspondence/marketing) for		MAC/IP address is available to the			officers, employees and agents of the Customer and its group or associated		obligations under the Contract including provision and management			
	Nasstar's Customer contact(s)) which		Customer as well as			companies, and other third parties		of the Services, maintenance of			
	is used by Nasstar Group for the		location of these within			who are concerned with the receipt		records of the Services, ensuring			
	purpose of sending B2B marketing, billing and customer relationship		a building where the LAN is available.			of the Services or enjoyment of the Customer's rights under the Contract.		effective communication between Nasstar and the Customer and			
	management purposes.							dealing with any rights, actions,			
								incidents or disputes arising under the Contract.			
								the Contract.			
	r	D	P	P	P						
Leased Lines, Ethernet Optical Services (Reseller)			•		•						
	Business contact details (e.g, name,	Name, Job Title, Email, Phone,	IP Address	N/A	N/A	Representatives with whom Nasstar	Provision of Services pursuant to the	Collecting, storing, processing and	During the Term of the Contract and		
	job title, company name and business e-mail address/phone number and	Location, IP Address, MAC address, Ticket History/Log Details	MAC address Browsing history by			interacts for marketing and customer relationship purposes including	Contract between Nasstar and the Customer.	releasing personal data for the purpose of Nasstar's fulfilment of its	for up to 7 years after the expiry or termination of the Contract.	Wholesale and TTB	
	records of	ricket instuly/ tog Details	MAC/IP address is			officers, employees and agents of the	customel.	obligations under the Contract	commission of the contract.	ĺ	
	correspondence/marketing) for		available to the			Customer and its group or associated		including provision and management		1	
	Nasstar's Customer contact(s)) which is used by Nasstar Group for the		Customer as well as location of these within			companies, and other third parties who are concerned with the receipt		of the Services, maintenance of records of the Services, ensuring		ĺ	
	purpose of sending B2B marketing,		a building where the			of the Services or enjoyment of the		effective communication between		ĺ	
	billing and customer relationship		LAN is available.			Customer's rights under the Contract.		Nasstar and the Customer and		ĺ	
	management purposes.							dealing with any rights, actions, incidents or disputes arising under			
						1		the Contract.		1	
Marine de la companya del companya de la companya del companya de la companya de	С	P	Р	P	Р						
Managed Hosting Services										ĺ	
	Business contact details (e.g, name,	Contact details for the Customer's	N/A	Any information which is hosted on		Representatives with whom Nasstar	Provision of Services pursuant to the	Collecting, storing, processing and	During the Term of the Contract and		
	job title, company name and business e-mail address/phone number and	admin and related commmunications and details of any Customer end-			their sensitive personal data or about other users in the form of Content	interacts for marketing and customer relationship purposes including	Contract between Nasstar and the Customer	releasing personal data for the purpose of Nasstar's fulfilment of its	for up to 7 years after the expiry or termination of the Contract.	Microsoft applications are used to communicate with customers (e.g. e-	
	records of	users who use the Service.		Content Data is not accessed or used	Data which Nasstar employees may	officers, employees and agents of the	customer.	obligations under the Contract	termination of the contract	mail, Skype/Teams) and some	
	correspondence/marketing) for			by Nasstar other than to provide	have access to in hosting the data or			including provision and management		personal data may be contained	
	Nasstar's Customer contact(s)) which is used by Nasstar Group for the			hosting services and any necessary support services.	in providing support, but it is not required or requested by Nasstar to	companies, and other third parties who are concerned with the receipt		of the Services, maintenance of records of the Services, ensuring		within these communications. Netapp	
	purpose of sending B2B marketing,				perform the services and Nasstar is			effective communication between			
	billing and customer relationship management purposes.				not the controller of any sensitive	Customer's rights under the Contract.		Nasstar and the Customer and dealing with any rights, actions,			
	management purposes.				uata.			incidents or disputes arising under			
								the Contract.			
	c	P	P	P	P						
Managed WAN Services	[ĺ			•						
	Production and the Control of the Co	Managar Lab Tible F. 17 Ti	In Address	N/A	No. at a second		Description of Courts	T- 6 (6)) No-stark	Districtly Town (CV)		
	Business contact details (e.g, name, job title, company name and business	Name, Job Title, Email, Phone, Location, IP Address, MAC address,	IP Address MAC address	N/A	Nasstar monitor the network for utilisation	Representatives with whom Nasstar interacts for marketing and customer	Provision of Services pursuant to the Contract between Nasstar and the	To fulfill Nasstar's obligations under the Contract including provision and	During the Term of the Contract and for up to 7 years after the expiry or	ĺ	
	e-mail address/phone number and	Ticket History/Log Details	Browsing history by		and packet loss	relationship purposes including	Customer.	management of the Services,	termination of the Contract.	ĺ	
	records of correspondence/marketing) for		MAC/IP address is available to the		statistics including network devices.	officers, employees and agents of the Customer and its group or associated		maintenance of records of the Services, ensuring effective		1	
	Nasstar's Customer contact(s)) which		available to the Customer as well as		network devices. No sensitive data	customer and its group or associated companies, and other third parties		communication between Nasstar and		ĺ	
	is used by Nasstar Group for the		location of these within			concerned with the receipt of the		the Customer and dealing with any		İ	
	purpose of sending B2B marketing, billing and customer relationship		a building where the LAN is available.			Services or enjoyment of the Customer's rights under the Contract.		rights, actions, incidents or disputes arising under the Contract.		ĺ	
	management purposes.		CLI/telephone number (ADSL			costomer's rights under the Contract.		wising affect the contract.		ĺ	
			monitoring)								
	с	P	P	P	P	1		1	1	1	
Network Connect											
	Business contact details (e.g, name,	Contact details for the Customer's	IP Address	N/A	Nasstar monitor the	Representatives with whom Nasstar	Provision of Services pursuant to the	To fulfill Nasstar's obligations under	During the Term of the Contract and	Telecoms providers including BT	
	job title, company name and business	admin and related commmunications.	MAC address		network for statistics including network devices.	interacts for marketing and customer	Contract between Nasstar and the		for up to 7 years after the expiry or	Wholesale and TTB	
	e-mail address/phone number and records of	comminunications.	Browsing history by MAC/IP address is		network devices. No sensitive data	relationship purposes including officers, employees and agents of the	customer.	management of the Services, maintenance of records of the	termination of the Contract.	ĺ	
	correspondence/marketing) for		available to the			Customer and its group or associated		Services, ensuring effective		ĺ	
	Nasstar's Customer contact(s)) which is used by Nasstar Group for the		Customer as well as location of these within			companies, and other third parties concerned with the receipt of the		communication between Nasstar and the Customer and dealing with any		ĺ	
	purpose of sending B2B marketing,		a building where the			Services or enjoyment of the		rights, actions, incidents or disputes		İ	
	billing and customer relationship		LAN is available.			Customer's rights under the Contract.		arising under the Contract.		İ	
	management purposes.		CLI/telephone number (ADSL monitoring)								
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