Notes:
- 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 & Communications Data.
- "C" references where Nasstar is a Controller of the personal data and "P" references where Nasstar is a Processor of the personal data.
- Nasstar uses a support service operated by its affiliate, ACT Teleconferencing Malaysia Sdn Bhd (based in Kuala Lumpar) ("**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.

* 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.

** 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.

Nasstar 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's services but which is created by users – ranging from video, call and email content data)	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of Customer Data by Nasstar as Processor*	Additional Info
Web Hosting	C	P	N/A	P	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 commmunications.	None	Any information which is hosted on Nasstar infrastructure and which is uploaded by the Customer when using Nasstar's Web 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 website 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	User Data and Content Data is hosted in Nasstar UK data centres.
VMCS (Virtual Machine Continuity Software)	C	P	N/A	P	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 commmunications and details of any Customer end-users who use the VMCS service.	None	Any information which is hosted on Nasstar infrastructure using Nasstar's VMCS 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	User Data and Content Data is hosted in Nasstar UK data centres.
SecureVault	C	P	N/A	P	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 commmunications and details of any Customer end-users who use the SecureVault service.	N/A	Any information which is hosted on Nasstar infrastructure using Nasstar's SecureVault service - 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	User Data and Content Data is hosted in Nasstar UK data centres.
Private Cloud	C	P	N/A	P	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 commmunications and details of any Customer end-users who use the Private Cloud service.	N/A	Any information which is hosted on Nasstar infrastructure using Nasstar's Private Cloud service - 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 website 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	User Data and Content Data is hosted in Nasstar UK data centres.
Public Cloud	C	P	N/A	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 commmunications and details of any Customer end-users who use the Public Cloud service.	N/A	**Nasstar would only have access to Content Data in the provision of 1st and 2nd line support (Nasstar public cloud does not host the customer's data on Nasstar infrastructure, this is provided by Microsoft Azure).**	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 website 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Customer data is hosted using **Microsoft Azure** cloud infrastructure which means that Customer data may be processed in the United States and other non-EEA countries - Microsoft utilises Standard Contractual Clauses. **ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	N/A
Managed Services	C	P	P	P	P	P	P	

Data Processing Schedule
Version 2.8
15 Sept 2023

Nasstar 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's services but which is created by users – ranging from video, call and email content data)	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of Customer Data by Nasstar as Processor*	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 Customer end-users who use the Managed Services (including details of any relevant third parties where relevant to an incident)	Any Comms Data which is necessary for Nasstar to provide trouble-shooting services (this would only be in exceptional circumstances).	Any Content Data which is necessary for Nasstar to provide trouble-shooting services e.g. screen-shots or information provided as part of an incident.	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 website 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Microsoft** applications are used to communicate with customers (e.g. e-mail, Skype/Teams) and some personal data may be contained within these communications. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**Microsoft.** Customer data may be processed in the United States and other non-EEA countries - Microsoft utilises Standard Contractual Clauses. **ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	N/A
Flexible Support	C	P	P	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 Managed Services (including details of any relevant third parties where relevant to an incident)	Any Comms Data which is necessary for Nasstar to provide trouble-shooting services (this would only be in exceptional circumstances).	Any Content Data which is necessary for Nasstar to provide trouble-shooting services e.g. screen-shots or information provided as part of an incident.	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 website 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Microsoft** applications are used to communicate with customers (e.g. e-mail, Skype/Teams) and some personal data may be contained within these communications. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**Microsoft.** Customer data may be processed in the United States and other non-EEA countries - Microsoft utilises Standard Contractual Clauses. **ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	N/A
Co-Location	C	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.	N/A	N/A	N/A	N/A	N/A	Nasstar's co-location services involve the housing of customer's hardware in Nasstar's premises but without any physical or logical access rights. As such, Nasstar processes very little customer personal data in the provision of co-location services and would only expect to process CRM Data (C)
Cloud Workspace	C	P		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.	End user account names in format firstname.lastname@business Customer administrators' account log-on in format firstname.lastname@business. Any customer user data which is held in the solution is potentially visible to a Nasstar administrator.	N/A	Any records containing personal data will be hosted on Nasstar Group infrastructure in the UK.	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 website 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	This product will be replaced in 2021 by Nasstar Private Cloud (see above).
Secure E-mail	C	P	P	P	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.	Details of end-users to support end-user retrieval of quarantined messages.	Details of emails sent to / from a given email address are recorded by the SecureMail service. This metadata includes date / time information and is stored within the system to support troubleshooting in the event of issues with the service, or investigation in to network activity. This metadata includes: IP Address, Device ID, Routing Information, Source / Destination IP addresses visited	End-users of the Customer will transmit information over email routinely which may contain personal data (and which Nasstar may have access to in providing Secure E-mail services and support).	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 website 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Customer data is hosted in Nasstar Group UK data centres (and other third party data centres in the UK).
Microsoft Office 365	C	P	P		P	P	P	P

Nasstar 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's services but which is created by users – ranging from video, call and email content data)	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of Customer Data by Nasstar as Processor*	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.	Users Name, Email Address, Tel no, Site location, Job title, User screen shot, Survey responses	Name, Job Title, Email, Phone, Location, Reporting Line, Call Quality, IP Address, MAC address, Microsoft Tenant ID	N/A	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 website 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	ServiceNow. Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). Cisco Call Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Customer data will be provided to Microsoft in its capacity as vendor which means that Customer data may be processed in the United States and other non-EEA countries - Microsoft utilises Standard Contractual Clauses. ServiceNow provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. Cisco Call Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Nasstar is a reseller of Microsoft Office 365 products and processes & a limited amount of customer information as the product/service is provided by Microsoft and customer data is hosted on Microsoft infrastructure. Support tickets are managed using ServiceNow.
Hosted Antivirus	C	P		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 Hosted Anti-virus services for the purpose of ensuring application of policies based on individual users/groups of end-users + asset/device information for management purposes (+ may include user name, device name, IP address, MAC address and log of websites visited by end-user where web-filtering is enabled).	N/A	To support trouble-shooting (only in exceptional circumstances e.g. screen-shots + remote access for 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 website 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	ServiceNow. Support is managed using ServiceNow (with customer data hosted in London and Amsterdam) Kaspersky. Where an incident with the software cannot be resolved by Nasstar, it may be escalated to Kaspersky. Cisco Call Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	It is possible that personal data provided by the customer in connection with the incident will be shared with Kaspersky in Russia to investigate/resolve the incident. ServiceNow provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. Cisco Call Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	N/A
EM&S (Enterprise Mobility & Security)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	N/A	N/A	N/A	N/A	N/A	N/A	N/A	No personal data is processed by Nasstar in respcet of EM&S as this is a 'grouped product' which is only provided in addition to another Nasstar Product (e.g. MS Office 365). For customers who purchase EM&S, please see the entries for the relevant Nasstar products.
Datto (discontinued) – moving to SecureVault	C	P		P	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 commmunications and details of any Customer end-users who use the Datto services.	N/A	To support trouble-shooting (only in exceptional circumstances e.g. screen-shots + remote access for support services). Nasstar's deployment and support teams have the ability to see and access any data held in Datto.	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 website 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	ServiceNow. Support is managed using ServiceNow (with customer data hosted in London and Amsterdam. Datto. May process back-up copies of customer data if customer elects to use Datto back-ups. Cisco Call Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	ServiceNow provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. Cisco Call Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Datto is a discontinued product and this service will move to Nasstar SecureVault (see above). Note that support service requests are managed using ServiceNow. Software vendor is Datto. Datto software is held on Nasstar infrastructure. No support services are provided by Datto. Datto may store back- ups of Customer data at Datto's EEA data centres depending on whether the customer elects to use Nasstar or Datto infrastructure.
Veeam Cloud Connect	C	P		P	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 commmunications and details of any Customer end-users who use the Veeam Cloud Connect services.	N/A	To support trouble-shooting (only in exceptional circumstances e.g. screen-shots + remote access for support services). Any Content Data is potentially visible to internal administrators but in order to do so Nasstar/s customer wouldneed to equest GVI to request Veeam to open the data.	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 website 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	ServiceNow. Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). Veeam. If a customer elects for back-ups of their data to be maintained by Veeam, this will be held in Veeam's EEA data-centres. Cisco Call Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	ServiceNow provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. Cisco Call Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	All Customer data is held on Nasstar Group datacentres in the UK other than back-ups held by Veeam (at the Customer's request/option), which are held in the EEA.
Network LAN Service	C	P	P	P	C	P	P	

Nasstar 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's services but which is created by users – ranging from video, call and email content data)	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of Customer Data by Nasstar as Processor*	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.	The Customer can send any data they wish to over this service and Nasstar Group doesn't control or have visibility of it	Nasstar monitor the network for utilisation and packet loss statistics including network devices. No sensitive data	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Autotask.** Support/incident management software. Supportworks. Support-incident management softawre. **MDSI.** Customer contact details shared with MDSI for site-visits to install hardware. **Aruba Central.** Holds customer IP addresses and MAC addresses in AWS Europe cloud (Nasstar resells HPE Aruba products) **Hortium.** Nasstar resells Hortium network monitoring software. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	N/A
Security Managed Services								
	<TODO: To update for Normcyber services>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WAN Services	C	P	P	P	C	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.	The Customer can send any data they wish to over this service and Nasstar Group doesn't control or have visibility of it	Nasstar monitor the network for utilisation and packet loss statistics including network devices. No sensitive data	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Autotask.** Support/incident management software. Supportworks. Support-incident management software. **MDSI.** Customer contact details shared with MDSI for site-visits to install hardware. **Aruba Central.** Holds customer IP addresses and MAC addresses in AWS Europe cloud (Nasstar resells HPE Aruba products) **Hortium.** Nasstar resells Hortium network monitoring software. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	N/A
Modality Hosted Voice Services including Teams Direct Routing, Contact	C	P	P	P	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.	Customer end-users and admins: personal contact details [name, address, phone number], photos (from customer's active directory), videos, screen/file sharing data, e-mail content data, device IDs (IP/MAC address), location data, caller ID info + emergency contact info (ELIN).	Device IDs (IP/MAC address), location data (for emergency contacts/service/ELIN - subnet and physical address information) and traffic data/routing information and caller ID info;	Any content created by an end-user and may include photos, videos, screen/file/video sharing, e-mail content, call recordings, video, photo (from customer's active directory).	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 website 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	Microsoft; Nasstar Group Intra-Group transfers (US, Australia and Malaysia); Enghouse (Contact Centre); Workstream People (Contact Centre); Verint (call-recording); Code/CLOBBR (UC Analytics Product); Nuvias (Hardware support inc Acme SBCs; inc. Siphon Networks); Cisco (Contact Centre); ServiceNow (Support)	Microsoft. (non-EEA processing including US). Nasstar Group may process personal data through its subsidiaries in the US, Australia and Malaysia. Enghouse + Workstream People. US; Verint. North Macedonia, Israel, US, Mexico, Brazil, India, Hong Kong, Indonesia + Australia; Nuvias. (UK, Dubai); Cisco (Contact Centre); ServiceNow (Support)	Microsoft Skype for Business (syncs with Customer's Active Directory (selected fields)) - Processes user data (user/SIP names, numbers, org details, e.g. role/loc) for set up, function and reporting; SBCs, Acme Packets for SfB) - Process user data for call routing; Provide user data for inclusion in call records* (origin/destination numbers, IP addresses, user/SIP names). Contact Centre (Enghouse EICC/CCSP) and Call Recording (Verint Verba) - 3rd party apps hosted on Modality servers in the UK. QoE (Microsoft) and UC Analytics used for platform monitoring and analytics. WER (Nasstar Group number management tool) used to enable routing.
Modality Managed Services including Modality Support	C	P	P	P	P	P	P	P

Nasstar 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's services but which is created by users – ranging from video, call and email content data)	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of Customer Data by Nasstar as Processor*	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.	Customer end-users and admins: personal contact details (name, address, phone number), photos (optional for contacts in ServiceNow), videos (may be included with support tickets in ServiceNow), screen/file sharing data (as part of troubleshooting or recordings provided with support tickets), e-mail content data (e-mails may be provided with support tickets), device IDs (IP/MAC address), location data,traffic/routing dat, caller ID info, Employee ID (as part of video managed services).	Comms Data may be shared for trouble-shooting/support e.g. screen-shots and log-files & may include device IDs (IP/MAC address), location data, traffic information, Websites visited (as part of troubleshooting), but is not routinely processed by Nasstar Group for Professional Services.	Any content created by an end-user and may include videos, screen/file sharing data, email content data,	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 website 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	Microsoft Azure cloud hosting and applications/services; Nasstar Group Intra-Group transfers (US, Australia and Malaysia); Power Admin LLC PA Monitoring system monitoring tool LastPass customer password repository; Cisco (Contact Centre); ServiceNow (Support)	Microsoft (non-EEA processing including US). Nasstar Group may process personal data through its subsidiaries in the US, Australia and Malaysia. LastPass process personal data in the US. ServiceNow provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. Cisco (Contact Centre); ServiceNow (Support)	Support is managed using ServiceNow (London, Amsterdam, US, Australia, India and Singapore). Services are provided using Power Admin LLC PA Monitoring tool (system monitoring tool) and Lastpass (Customer password management tool).
Modality Professional Services including consultancy & project/change management	C	P	P	P	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.	Customer's staffend-users: contact details (name/address/business e-mail + phone number); video, screen/file sharing, e-mail content, device ID (IP address/MAC address), location data, traffic data/routing info, caller ID info.	Device ID (IP address/MAC address), location data, traffic data/routing info, caller ID info	Any content created by an end-user.	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 website 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	Microsoft Azure cloud hosting and applications/services; Nasstar Group Intra-Group transfers (US, Australia and Malaysia); Cisco (Contact Centre); ServiceNow (Support)	Microsoft (non-EEA processing including US). Nasstar Group may process personal data through its subsidiaries in the US, Australia and Malaysia. LastPass process personal data in the US. ServiceNow provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. Cisco (Contact Centre); ServiceNow (Support)	Project data may include some Customer personal data which is processed using the 'Projector' application which is hosted on Nasstar Group data-centres in the UK
Modality SaaS including Teamwork Analytics, OneConsultation, OneMeeting & CreateTeam	C	C	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.	Customer's end-users: personal contact details (name, address, telephone number etc.), date of birth, videos, SMS/MMS data, screen/file sharing, email content data, device IDs (IP Address/MAC Address), caller ID info, Customer's O365 profile data/credentials, User name/SIP address, public IP address	End-users: location data, caller ID info	End-users: any content created by an end-user and shared through a SaaS service (Nasstar Group will not routinely access this data other than for trouble-shooting/support reasons)	**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 website 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**	**Auth0** identity management (EU hosted tenant); **IPWhois** IP geolocation solution; **Microsoft Azure** cloud hosting and applications/services; **Nasstar Group** Intra-Group transfers (US, Australia and Malaysia); **Pexip:** video bridging manufacturer **Twilio:** SMS solution SendGrid - email solution; **Cisco** (Contact Centre); **ServiceNow** (Support)	IPWhois (servers located globally, non-EEA processing) Microsoft (non-EEA processing including US). Nasstar Group may process personal data through its subsidiaries in the US, Australia and Malaysia. Pexip (EEA); Twilio (US, UK including non-EEA processing); Sendgrid (US, UK, including non-EEA processing); Cisco (Contact Centre); ServiceNow (Support)	N/A
Modality Microsoft Licencing	C	N/A	N/A	N/A	N/A	**Microsoft Azure** cloud hosting for CSP Portals. **Cloudmore** Cloudmore CSP Portal	N/A	Microsoft CSP Portals are hosted in the UK/EU/EEA. Microsoft (Azure)-resident application hosted in the EU/EEA.
	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.							
Modality Project Based Professional and Support Service Subprocessors								
						Actiance - Compliance Recording; AGAT - Sphereshield	**Actiance** - India and US	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						AGAT - Sphereshield (Security product)	**AGAT** - Israel (EU Adequacy Decision)	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Altigen - Contact Centre in the UK and US	**Altigen** - US	Modality may use this Authorised Sub-Processor to provide products and services to customers.

Nasstar 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's services but which is created by users – ranging from video, call and email content data)	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of Customer Data by Nasstar as Processor*	Additional Info
						Arrow - SBC distribution and support	**Arrow** - APAC	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Cloud Business - Sharepoint consultancy in the UK	N/A	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Competella - Contact Centre in Sweden, Norway, Denmark and India	**Competella** - India	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Fastlane - UA Pro Servs in UK & Germany	N/A	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						GTT - Sophos network support	**GTT** - Global including non-EEA countries	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						IOMmart - data centres	**IOMmart** - Global including non-EEA countries	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Kemp - Load Balancers/reverse proxy manufacturer	**Kemp** - Global including non-EEA countries	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Kinly - AV services in the UK	N/A	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Landis - AttendPro & other Landis apps	**Landis** - US	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Northamber - Kemp distribution and support in the UK	N/A	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Nuvias - Hardware support inc Acme SBCs including Siphon Networks in the UK, Europe and Dubai	**Nuvias** - Dubai	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Project Vision - IT network support for Sophos customer	UK	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Point Sharp - Security software (Sweden)	N/A	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Poly - End-user/room device manufacturer	**Poly** - Global including non-EEA countries	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Pure-IP - SIP carrier	**Pure-IP** - Global including non-EEA countries	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Redstor - Backup solutions in the UK	N/A	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						SCC AVS - AV services & equirement	UK	
						Screencult - Video production (ACM content)	UK	
						Techland - SBC distribution & support in the UK	N/A	Modality may use this Authorised Sub-Processor to provide products and services to customers.
						Tecnomic - Audiocodes reseller	**Tecnomic** - Australia	Modality may use this Authorised Sub-Processor to provide products and services to customers.
Microsoft Office 365	C	P	P		C	P	P	P

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	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.	Administrator's name, Job Title, Email, Phone, Location, IP Address, MAC address, Ticket History/Log Details	IP Address MAC address when using NAT, originators private IP address can be obtained	N/A	Nasstar Group monitor the network for utilisation and packet loss statistics including network devices and in so doing could process personal data in the form of device IDs e.g. IP/MAC addresses + call records.	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **BT Wholesale** - PSTN access circuits, **TalkTalk Business** - data access circuits, **Virgin Media** - PSTN access circuits, **Vodafone** - PSTN access circuits **Xtel** - on-site engineering services. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Support is managed using ServiceNow (London, Amsterdam, US, Australia, India and Singapore) and 'Matilda' for customers in Ireland (hosted on Nasstar Group data centres in the UK). Customer contact details may be shared with third parties for commissioning, decommissioning & support (BT Wholesale - PSTN access circuits, TalkTalk Business - data access circuits, Virgin Media - PSTN access circuits, Vodafone - PSTN access circuits and Xtel - on-site engineering services)
Nasstar Contact Services including OmniChannel, Inbound, Outbound and Call Recording	C	P	P	P	P & C	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, Reporting Line, Call Quality, IP Address, MAC address, Call History/Log Details, Agent Profile & Skills, Hold location data and map address for emergency/number contact.The Contact Centre Software is set to a Fixed IP Address range for security which means that Nasstar have an IP address range and device type (in some cases).	Name, Job Title, Email, Phone, Location, Reporting Line, Call Quality, IP Address, MAC address, Call History/Log Details, Agent Skills, Hold location data and map address for emergency/number contact. Agent interaction times and functions recorded against activity;	Interaction data i.e. records of interactions between Customer's staff and other individuals using the contact Centre (Max Contact) product including IM, call recording, video recording and screen recording.	Network monitoring/routing info for the purpose of monitoring the Nasstar contact center serve (C) 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 website 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 (P).	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Max Contact Limited** - support and hosting in the UK **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**Microsoft** (non-EEA) It is possible that support may be required from Microsoft and that Customer data in respect of a support request is processed by Microsoft outside the EEA including the US. Microsoft utilises Standard Contractual Clauses for non-EEA processing. **ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	All Customer data is processed by Nasstar Group members using Nasstar Group data centres in the UK and Microsoft Azure data-centres in the UK region operated by Max Contact Limited for Nasstar Group. 3rd line support is provided by Max Contact imited in the UK.
Smart Messenger including SMS, Smart Chat, Smart Vouchers and	C	P	P	P	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.	End-users of Nasstar customers + customer admins + third parties (e.g. callers/called parties). For end-users: name and e-mail address, MD5 hashed password and photo;	Recipients mobile number, IP Address is logged for API connections, MAC and device ID if available, Message routing information, Recipient message History/Log Details;	Any content created by the Customer and used as part of the Smart Messenger service (e.g. messages, coupons, surveys etc.)	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 website 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Sinch UK Limited** - route/parse messages to networks **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	All Customer data is processed by Nasstar Group members using Nasstar Group data centres in the UK.
Mobile Self Service including Docs Delivered, Nasstar Identity and Full Voice Self Service	C	P	P	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 commmunications and details of any Customer end-users who use Mobile Self Service including Name, Email address, MD5 Hashed password, photo	Recipients mobile number, IP Address is logged for API connections, MAC and device ID if available, Message routing information, Recipient message History/Log Details	Message/document content	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 website 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Xtreme Internet Solutions BVBA (t/a Coupon Tools)** - powers 'Docs Delivered' platform **Sinch UK Limited** - route/parse messages to networks **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Mobile Self Service are derivative products of Nasstar Talk. Mobile Self Service is integrated through APIs with Smart Messenger (see above). Docs Delivered uses a platform provided by Xtreme Internet Solutions BVBA in Belgium t/a Coupon Tools. Any SMS messages are sent via mobile network operators (e.g. EE, Vodafone, and O2) using an SMSC aggregator (Sinch/CLX Communications). Voice products (e.g. Nasstar Identity and Voice Self-Service) are further described in Nasstar Talk (see below).

Nasstar 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's services but which is created by users – ranging from video, call and email content data)	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of Customer Data by Nasstar as Processor*	Additional Info
Nasstar Talk including TalkTeams, TalkLive, CloudIVR and Talk	C	P	P	P	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 commmunications and details of any Customer end-users who use the Nasstar Contact services including Name, Job Title, TEAMS details, Phone, Reporting Line, Call Quality, IP Address, MAC address, Call History/Log Details,	IP Address, MAC address, Call History/Log Details - caller/called party data and video recording and screen recording meta-data	Interactions between individuals who use Nasstar Talk Services including IM, MS TEAMS calls, video recording and screen recording.	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 website 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Boom Limited** - data centres in UK and Netherlands & support services. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Customer data is hosted at Boom Limited's data-centres in the UK and the Netherlands and Level 3 and Level 4 support is provided by Boom Limited.
PCI – Nasstar AgentPay, SecureContract, VoicePay	C					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.	No personal data is processed through these Nasstar solutions and payment card data is parsed to the Customer's PSP - any end-user data processed by Nasstar would be processed through other Nasstar solutions e.g. Nasstar Talk or Nasstar Contact Centre	No personal data is processed through these Nasstar solutions and payment card data is parsed to the Customer's PSP.	No personal data is processed through these Nasstar solutions and payment card data is parsed to the Customer's PSP.	No personal data is processed through these Nasstar solutions and payment card data is parsed to the Customer's PSP.	ServiceNow. Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). Aeriandi Ltd (SPEIK). PCI compliant products and data-centres in the UK (for AgentPay & VoicePay). Computer & Communications Co. Limited (C3). PCI compliant products and data-centres in the UK (for SecureContract & AutoPay). **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Any payment card data is processed through SPEIK or C3 products and data-centres in the UK - Nasstar has no access to or visibility of payment card data held in SPEIK or C3 servers.
PCI - Nasstar WebPay	C	P	P	P	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.	End-users of Nasstar customers - IP address	End-users of Nasstar customers - Chat content (e.g. would include time-stamps/data-stamps)	End-users of Nasstar customers - any Chat content (e.g. messages/conversations)	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 website 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	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Converse360** - chatbot software & support **Aeriandi Ltd (SPEIK).** PCI compliant products and data-centres in the UK (for AgentPay & VoicePay). **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Chatbot uses Converse 360 software and data-centres in the UK and PCI sessions use SPEIK software and PCI-DSS compliant data-centres in the UK (PCI card data is parsed to the Customer's PSP and is not processed by Nasstar - Nasstar has no access to or visibility of payment card data held in SPEIK servers).
Nasstar Routing (WER)	C	P	P	N/A	C	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 + emergency contact and related commmunications + details of any end-users (e.g. caller/called number)	Phone numbers allocated to Nasstar customer, routing information is allocated to each of the Nasstar's customers allocated numbers, CLI data if specific routing or blocking is required, third pary data e.g. Caller ID	N/A	Disclosure of Customer's emergency contract may be made to emergency services where there is a silent or abandoned call - customer emergency contact details would be provided if requested for this purpose.	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Shout Telecom** - support services **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Customer data is held on Nasstar datacentres in the UK and Shout Telecom datacentres in the UK.
Internet Access	C	P	P	N/A	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 commmunications	Data usage (CDRs) IP Address is 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.	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Autotask.** Support management (UK & EEA). **Hortium.** Stores Comms Data. Comms365 - CPE management portal, 3rd line support + delivery of SIM cards to customers **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Support is managed through Autotask (UK & EEA) and ServiceNow (London, Amsterdam, US, Australia, India and Singapore) and Comms Data is stored in Hortium (UK) & ServiceNow (London, Amsterdam, US, Australia, India and Singapore).
Rapid Network Development	C	P	P		C & P	P	P	P

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	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 commmunications	IP Address is stored for remote management and support.	N/A	IP address is used for status monitoring (C) and remote support and management (P). No sensitive data.	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Autotask.** Support management (UK & EEA). **Hortium.** Stores Comms Data. **Comms365** - CPE management portal, 3rd line support + delivery of SIM cards to customers **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Support is managed through Autotask (UK & EEA) and ServiceNow (London, Amsterdam, US, Australia, India and Singapore) and Comms Data is stored in Hortium (UK) & ServiceNow (London, Amsterdam, US, Australia, India and Singapore).
MPLS Managed Network Services	C	P	P		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 commmunications	IP Address is stored for remote management and support.	N/A	IP address is used for status monitoring (C) and remote support and management (P). No sensitive data.	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Autotask.** Support management (UK & EEA). SupportWorks. Support management **Hortium.** Stores Comms Data. **BT Wholesale, TalkTalk Business + VIrgin Media.** Wholesale carrier of access circuits. **Xtel, Infradata + Commscare.** Onsite engineering services. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Support is managed through Autotask (UK & EEA) and ServiceNow (London, Amsterdam, US, Australia, India and Singapore) and Comms Data is stored in Hortium (UK).
Nasstar Connect DMMA	C	P	P		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 commmunications	IP Address & MAC address is stored for remote management and support (when using NAT) and originator's IP address may be held.	N/A	IP address is used for status monitoring (C) and remote support and management (P). No sensitive data.	**ServiceNow.** Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Autotask.** Support management (UK & EEA). **SupportWorks.** Support management **Hortium.** Stores Comms Data. **Xtel, Infradata + Commscare.** Onsite engineering services. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	**ServiceNow** provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Support is managed through Autotask (UK & EEA) and ServiceNow (London, Amsterdam, US, Australia, India and Singapore) and Comms Data is stored in Hortium (UK).
National Business Leased Lines; Hosting Services (Colocation); and Broadband Services	C	NA	NA	NA	NA	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.	NA	NA	NA	NA	ServiceNow. Support is managed using ServiceNow (with customer data hosted in London and Amsterdam). **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	ServiceNow provide support for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. **Cisco Call Recording.** Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Support is managed through ServiceNow (London, Amsterdam, US, Australia, India and Singapore).
Professional Services - Implementation Assessment (Security and Infrastructure Review), Bespoke Assessment	C	NA	NA	NA	P	NA	NA	NA

Nasstar 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's services but which is created by users – ranging from video, call and email content data)	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of Customer Data by Nasstar as Processor*	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.	NA	NA	NA	Professional Service is provided by working within the Customer Environment and is subject to their Information Security and Handling policies.	NA	NA	NA