- 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 Kusala 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 Asstar's Intra Group Data Transfer Agreement and technical and organisation measures documented within the organisation fistergrated 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.

See Freedom Name The Analysian of Control o		CDM Date	Han Date	Communication	Combant Data (this	Other line Service Date	Lauthering Cut. D	New FFA Processing	Additional Info
Modeling Content state in a cont	Nasstar Product/Service	representatives with whom Nasstar interacts for marketing and customer	customer's end users e.g. their contact details and authentication details, among	traffic and location data that Nasstar will process in order to perform certain services	processed in the provision of Nasstar's services but which is created by users – ranging	Other (incl. Sensitive Data)	Authorised Sub-Processors		Additional Info
And the control control code is decided by the company of the control code is the control code in the control code in the code is the code in the code is the code in the code in the code is the code in the code in the code is the code in the code in the code is the code in the code in the code is the code in the code in the code in the code is the code in the code in the code in the code is the code in the code in the code in the code in the code is the code in the code in the code in the code in the code is the code in the code in the code in the code in the code is the code in the code in the code in the code in the code is the code in the code		relationship purposes)	other things)						
Sets, publication in any and included in the control of the contro	Web Hosting	С	P	N/A	P	P	P	P	P
Any information with 1 but the contract details for the same and between emitted and processors and details for the same and between emitted and processors and details for the same and between emitted and processors and details for the same and between emitted and the same and		name, job title, company 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	Customer's admin and related	None	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	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	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	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	User Data and Content Data is hosted in Nasstar UK data centres.
Sources contact details (a.g., where the contact of	/MCS (Virtual Machine	С	Р	N/A	Р	P	Р	P	Р
Business contact details in ¿ contact details in ¿ contract details for the contract in contract details in contract contract details in contract contract in	onknowy Johnson	name, job title, company 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	Customer's admin and related commmunications and details of any Customer end-users	None	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	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	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	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	User Data and Content Data is hosted in Nasstar UK data centres.
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content (s) which is used by Nasstar (southerer and another purpose). Silic Cloud C Buriness contact details (e.g., conpany name and business e-mail address/shone number and purposes. Blic Cloud C Buriness contact details (e.g., conpany name and business e-mail address/shone number and evers of or content). The purpose of sending 828 marketing, and business e-mail and purposes. Blic Cloud C Buriness contact details (e.g., conpany name and business e-mail and oresylvane ment purposes. Blic Cloud C Buriness contact details (e.g., conpany name and business e-mail and correspondence/marketing) for Nasstar's Conpany name and business e-mail and evers of or every purposes. Blic Cloud C Buriness contact details (e.g., conpany name and business e-mail and correspondence/marketing) for Nasstar's Customer and business e-mail and evers of or every purpose. Blic Cloud C Buriness contact details (e.g., conpany name and business e-mail and corespondence/marketing) for Nasstar's Customer and business e-mail and every for or every purpose. Blic Cloud C Buriness contact details (e.g., conpany name and business e-mail and records of correspondence/marketing) for Nasstar's Customer and business e-mail and records of correspondence/marketing for Nasstar's Customer and business e-mail and records of correspondence/marketing for Nasstar's Customer and business e-mail and records of correspondence/marketing for Nasstar's Customer and business e-mail and every for or purpose. Blic Cloud C P Contact details (e.g., conpany name and business e-mail and every for or purpose and for every for every for every form and records of a controller or any sensitive data and the recorded or any sensitive data any be processed in the U.S. Auxtralla, indicate the controller of a	Private Cloud	С	Р		Р	P	Р	р	Р
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 Sustomer contact(s) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes. Contact details (e.g., name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Sustomer 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 customer's admin and related 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 Nasstar foroup for the purpose of sending B2B marketing, billing and customer relationship management purposes. Contact details for the Customer's admin and related customer's admin and related and business e-mail address/phone number and records of correspondence/marketing) for Nasstar's Sustomer 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 customer's admin and related the provision of 1st and 2nd line support (Nasstar would only have access to the form of Content Data with Nasstar employed with customer data bota before users in the form of Content. Data which Nasstar employed with customer data bota of any same their sensitive personal data or about other users in the form of Content Data with Nasstar employed with customer data bota on Nastar since in the form of Content Data with Nasstar employed with customer data on Nastar since in the form of Content Data with Nasstar employed with customer data on Nastar since in the form of Content Data with Nasstar employed with customer and variety of the providing support, In the form of Content	Public Cloud	name, job title, company 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	Customer's admin and related commmunications and details of any Customer end-users who use the Private Cloud	N/A	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	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	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	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	User Data and Content Data is hosted in Nasstar UK data centres.
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 admin and related communications and details of any Customer end-users who use the Public Cloud service. Sacross to Content Data in the provision of 1st and 2nd line support (Nasstar contact(s)) which is used by Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management purposes. Customer's admin and related communications and details of any Customer end-users who use the Public Cloud does not host the customer's data on Nasstar infrastructure, this is provided by Microsoft Azure. Microsoft Azure cloud (with customer adat hosted in London and Amsterdam). Data which Nasstar employees may have access to in hosting support, but it is not required or requested by Nasstar for the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is not the controller of any sensitive data Nasstar is the form of Content. Data which Nasstar employees the website or in providing support, but it is not required to provide by the website or in providing support, but it is not required to pr	asiic ciodd	Business contact details (e.g,	Contact details for the	N/A	Nasstar would only have	Sensitive Data - Individuals	ServiceNow. Support is	Customer data is hosted using	N/A
upand Sources C		name, job title, company 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	commmunications and details of any Customer end-users who use the Public Cloud		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	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	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	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	
	Managed Services	С	P	P	l _p	lp	l _p	P	

Nasstar Product/Service	CRM Data (this is the personal data of representatives with whom Nasstar interacts for marketing and customer relationship purposes) 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.	User Data (this is focussed on a customer's end users e.g., their contact details and authentication details, among other things) 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)	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) Any Comms Data which is necessary for Nasstar to provide trouble-shooting services (this would only be in exceptional circumstances).	Content Data (this would cover a range of data that is processed in the provision of nastar's services but which is created by users – ranging from video, call and email content data). 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/Feams) 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.	Non-EEA Processing of Customer Data by Nasstar as Processor* 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.	Additional Info
Flexible Support	E 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.	P 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)	P Any Comms Data which is necessary for Nasstar to provide trouble-shooting services (this would only be in exceptional circumstances).	P 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.	P 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). 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.	P 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	E 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 purpos of sending B2B marketing billing and customer relationship management purposes.	P Contact details for the Customer's admin and related commmunications.	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	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 B28 marketing, billing and customer relationship management purposes.	P 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	P Any records containing personal data will be hosted on Nasstar Group infrastructure in the UK.	P 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). Cisco Call Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	P 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 Microsoft Office 365	C 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.	P Details of end-users to support end-user retrieval of quarantined messages.	P 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	P 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).	P 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). Cisco Call Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	P 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.	P Customer data is hosted in Nasstar Group UK data centres (and other third party data centres in the UK).

Nasstar Product/Service	CRM Data (this is the personal data of representatives with whom Nasstar interacts for marketing and customer relationship purposes) Business contact details (e.g.	User Data (this is focussed on a customer's end users e.g., their contact details and authentication details, among other things) Users Name, Email Address, Tel no, Site	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) Name, Job Title, Email, Phone, Location, Reporting Line, 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) Sensitive Data - Individuals	Authorised Sub-Processors ServiceNow. Support is	Non-EEA Processing of Customer Data by Nasstar as Processor* Customer data will be	Additional Info Nasstar is a reseller of
	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.	chilal Audress, felliof, site location, lob title, User screen shot, Survey responses	Location, Reporting Line, Lan Quality, IP Address, MAC address, Microsoft Tenant ID		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	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.	provided to Microsoft in its capacity as wendor 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.	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	Elbusiness 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 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) Raspersky. 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 USA, 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 respect 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	С	P		P	P	p	р	P
Near Chail Connect	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 B28 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 Nastar 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 offware 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	Business contact details (e.g,	P Contact details for the	N/A	To support trouble-shooting	P Sensitive Data - Individuals	P ServiceNow. Support is	P ServiceNow provide support	P All Customer data is held on
	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 admin and related commmunications and details of any Customer end-users who use the Veeam Cloud Connect services.		(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.	may share their sensitive personal data or about other users in the form of Content	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 Veaam's EEA data-centres. Cisco Call Recording C. alls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	for managed services which means that Customer data may be processed in the US, Australia, India and Singapore. Gisco Call Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	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	ļ.	l _k	۲	l _h	lr	l _h	l _k	

Nasstar Product/Service	CRM Data (this is the personal data of representatives with whom Nasstar interacts for marketing and customer relationship purposes) 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.	User Data (this is focussed on a customer's end users e.g. their contact details and authentication details, among other things) Name, Job Title, Email, Phone, Location, IP Address, MAC address, Ticket History/Log Details	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) 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.	Content Data (this would cover a range of data that is processed in the provision of masstar's services but which is created by users – ranging from video, call and email content data) 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. Supportworks. Support-incident management software. MDSI. Customer contact details shared with MDSI for site-wisits 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 Cail Recording. Calls to the Support are recorded using Cisco Call Recording for quality improvement purpose.	Non-EEA Processing of Customer Data by Nasstar as Processor* 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.	Additional Info
Security Managed Services								
	<todo: for<br="" to="" update="">Normcyber services></todo:>	N/A	N/A	N/A	N/A	N/A	N/A	N/A
WAN Services	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.	P 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	C Nasstar monitor the network for utilisation and packet loss statistics including network devices. No sensitive data	P 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-wists to install hardware. Aruba Central. Holds ustomer IP addresses and MAC addresses in AWS Europe cloud (Nasstar resells HPE Aruba product). Hortium. Nasstar resells Hortium network monitoring software. Cisso 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	С	P	P	P	P	P	P	P
Modality Managed	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 B28 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; Assatar Group Intra-Group Intransfers (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 Centrel; 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 Sf8) - 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.
Services including Modality Support								

	CRM Data	User Data	Communications Data	Content Data (this would	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of	Additional Info
	(this is the personal data of	(this is focussed on a	(this will include a range of	cover a range of data that is	Other (Incl. Sensitive Data)	Authorised Sub-Processors	Customer Data by Nasstar as	Additional into
	representatives with whom	customer's end users e.g. their	traffic and location data that	processed in the provision of			Processor*	
Nasstar Product/Service	Nasstar interacts for marketing and customer	contact details and authentication details, among	Nasstar will process in order to perform certain services	Nasstar's services but which is created by users – ranging				
	relationship purposes)	other things)	(e.g. number called,	from video, call and email				
			date/time, duration of call)	content data)				
	Business contact details (e.g,	Customer end-users and	Comms Data may be shared	Any content created by an end-	Sensitive Data - Individuals	Microsoft Azure cloud hosting	Microsoft (non-EEA processing	Support is managed using
	name, job title, company name and business e-mail	admins: personal contact details (name, address, phone	for trouble-shooting/support e.g. screen-shots and log-files	user and may include videos, screen/file sharing data, email	may share their sensitive personal data or about other	and applications/services; Nasstar Group Intra-Group	including US). Nasstar Group may process personal data	ServiceNow (London, Amsterdam, US, Australia,
	address/phone number and	number), photos (optional for	& may include device IDs	content data,	users in the form of Content	transfers (US, Australia and	through its subsidiaries in the	India and Singapore).
	records of	contacts in ServiceNow),	(IP/MAC address), location		Data which Nasstar employees		US, Australia and Malaysia.	Services are provided using
	correspondence/marketing) for Nasstar's Customer	videos (may be included with support tickets in	data, traffic data/routing information, Websites visited		may have access to in hosting the website or in providing	Power Admin LLC PA Monitoring system monitoring	LastPass process personal data in the US. ServiceNow	Power Admin LLC PA Monitoring tool (system
	contact(s)) which is used by	ServiceNow), screen/file	(as part of troubleshooting),		support, but it is not required	tool LastPass	provide support for managed	monitoring tool) and
	Nasstar Group for the purpose of sending B2B marketing,	sharing data (as part of troubleshooting or recordings	but is not routinely processed by Nasstar Group for		or requested by Nasstar to perform the services and	customer password repository;	services which means that Customer data may be	Lastpass (Customer password management
	billing and customer		Professional Services.		Nasstar is not the controller of	Cisco (Contact Centre);	processed in the US, Australia,	tool).
	relationship management purposes.	e-mail content data (e-mails may be provided with support			any sensitive data	ServiceNow (Support)	India and Singapore. Cisco (Contact Centre);	
	parposes.	tickets), device IDs (IP/MAC					ServiceNow (Support)	
		address), location data,traffic/routing dat, caller						
		ID info, Employee ID (as part						
		of video managed services).						
Modality Professional	c	P	P	P	P	P	P	P
Services including consultancy &								
project/change								
management	Business contact details (e.g,	Customer's staffend-users:	Device ID (IP address/MAC	Any content created by an end-	Sensitive Data - Individuals	Microsoft Azure cloud hosting	Microsoft (non-EEA processing	Project data may include
	name, job title, company	contact details	address), location data, traffic		may share their sensitive	and applications/services;	including US). Nasstar Group	some Customer personal
	name and business e-mail address/phone number and	(name/address/business e- mail + phone number); video,	data/routing info, caller ID info		personal data or about other users in the form of Content	Nasstar Group Intra-Group transfers (US, Australia and	may process personal data through its subsidiaries in the	data which is processed using the 'Projector'
	records of	screen/file sharing, e-mail			Data which Nasstar employees	Malaysia);	US, Australia and Malaysia.	application which is hosted
	correspondence/marketing) for Nasstar's Customer	content, device ID (IP address/MAC address),			may have access to in hosting the website or in providing	Cisco (Contact Centre); ServiceNow (Support)	LastPass process personal data in the US. ServiceNow	on Nasstar Group data- centres in the UK
	contact(s)) which is used by	location data, traffic			support, but it is not required		provide support for managed	
	Nasstar Group for the purpose of sending B2B marketing,	data/routing info, caller ID info.			or requested by Nasstar to perform the services and		services which means that Customer data may be	
	billing and customer				Nasstar is not the controller of		processed in the US, Australia,	
	relationship management purposes.				any sensitive data		India and Singapore. Cisco (Contact Centre);	
	purposes.						ServiceNow (Support)	
Modality SaaS including	С	С	P	P	P			
Teamwork Analytics,								
OneConsultation, OneMeeting &								
CreateTeam	Rusiness contact details (e.g.	Customer's and users	End-users: location data, caller	End-users: any content	Sancitiva Data - Individuale	Auth0 identity management	IPWhois (servers located	N/A
	Business contact details (e.g, name, job title, company	Customer's end-users: personal contact details	End-users: location data, caller ID info	End-users: any content created by an end-user and	Sensitive Data - Individuals may share their sensitive	Auth0 identity management (EU hosted tenant);	IPWhois (servers located globally, non-EEA processing)	N/A
	name, job title, company name and business e-mail	personal contact details (name, address, telephone		created by an end-user and shared through a SaaS service	may share their sensitive personal data or about other	(EU hosted tenant); IPWhois IP geolocation	globally, non-EEA processing) Microsoft (non-EEA processing	N/A
	name, job title, company	personal contact details		created by an end-user and	may share their sensitive	(EU hosted tenant);	globally, non-EEA processing)	N/A
	name, job title, company name and business e-mail address/phone number and records of correspondence/marketing)	personal contact details (name, address, telephone number etc.), date of birth, videos, SMS/MMS data, screen/file sharing, email		created by an end-user and shared through a SaaS service (Nasstar Group will not routinely access this data other than for trouble-	may share their sensitive personal data or about other users in the form of Content Data which Nasstar employees may have access	(EU hosted tenant); IPWhois IP geolocation solution; Microsoft Azure cloud hosting and applications/services;	globally, non-EEA processing) Microsoft (non-EEA processing including US). Nasstar Group may process personal data through its subsidiaries in the	N/A
	name, job title, company name and business e-mail address/phone number and records of	personal contact details (name, address, telephone number etc.), date of birth, videos, SMS/MMS data,		created by an end-user and shared through a SaaS service (Nasstar Group will not routinely access this data	may share their sensitive personal data or about other users in the form of Content Data which Nasstar employees may have access	(EU hosted tenant); IPWhois IP geolocation solution; Microsoft Azure cloud hosting	globally, non-EEA processing) Microsoft (non-EEA processing including US). Nasstar Group may process personal data	N/A
	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	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		created by an end-user and shared through a SaaS service (Nasstar Group will not routinely access this data other than for trouble-	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	(EU hosted tenant); IPWhois IP geolocation solution; Microsoft Azure cloud hosting and applications/services; Nasstar Group Intra-Group transfers (US, Australia and Malaysia);	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); Twillo (US, UK including non-EEA processing);	N/A
	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 BZB marketing,	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		created by an end-user and shared through a SaaS service (Nasstar Group will not routinely access this data other than for trouble-	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	(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	globally, non-EEA processing) Microsoft (non-EEA processing) Microsoft (non-EEA processing) miculding 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	N/A
	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 leationship management	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		created by an end-user and shared through a SaaS service (Nasstar Group will not routinely access this data other than for trouble-	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	(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	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) Cisco (Contact Centre);	N/A
	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	personal contact details (name, address, telephone number etc.), date of birth, videos, SMS/MMS data, screen/file sharing, email content data, device 10s (IP Address/MAC Address), caller ID info, Customer's 0365 profile data/credentials, User name/SIP address, public IP		created by an end-user and shared through a SaaS service (Nasstar Group will not routinely access this data other than for trouble-	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	(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 Truilio: SMS solution SendGrid - email solution;	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);	N/A
	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 leationship management	personal contact details (name, address, telephone number etc.), date of birth, videos, SMS/MMS data, screen/file sharing, email content data, device 10s (IP Address/MAC Address), caller ID info, Customer's 0365 profile data/credentials, User name/SIP address, public IP		created by an end-user and shared through a SaaS service (Nasstar Group will not routinely access this data other than for trouble-	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	(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	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) Cisco (Contact Centre);	N/A
	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 leationship management	personal contact details (name, address, telephone number etc.), date of birth, videos, SMS/MMS data, screen/file sharing, email content data, device 10s (IP Address/MAC Address), caller ID info, Customer's 0365 profile data/credentials, User name/SIP address, public IP		created by an end-user and shared through a SaaS service (Nasstar Group will not routinely access this data other than for trouble-	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	(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; Closo (Contact Centre);	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) Cisco (Contact Centre);	N/A
CreateTeam Modality Microsoft	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 leationship management	personal contact details (name, address, telephone number etc.), date of birth, videos, SMS/MMS data, screen/file sharing, email content data, device 10s (IP Address/MAC Address), caller ID info, Customer's 0365 profile data/credentials, User name/SIP address, public IP		created by an end-user and shared through a SaaS service (Nasstar Group will not routinely access this data other than for trouble-	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	(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; Closo (Contact Centre);	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) Cisco (Contact Centre);	N/A
CreateTeam	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.	personal contact details (name, address, telephone number etc.), date of birth, videos, SMS/MMS data, screen/file sharing, email content data, device 10s (IP Address/MAC Address), caller ID info, Customer's 0365 profile data/credentials, User name/SIP address, public IP		created by an end-user and shared through a SaaS service (Nasstar Group will not routinely access this data other than for trouble-	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	(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; Closo (Contact Centre);	globally, non-EEA processing) Microsoff (non-EEA processing including US). Nasstar Group may process personal data through its subsidiaries in the US, Australia and Malaysia. Pexip (EEA); Twillo (US, UK including non-EEA processing); Sendgrid (US, UK, including non-EEA processing); Cisco (Contact Centre); ServiceNow (Support)	N/A N/A Microsoft CSP Portals are
CreateTeam Modality Microsoft	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. C Business contact details (e.g., name, job title, company	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	ID info	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)	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	(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) Microsoft Azure cloud hosting for CSP Portals.	globally, non-EEA processing) Microsoff (non-EEA processing including US). Nasstar Group may process personal data through its subsidiaries in the US, Australia and Malaysia. Pexip (EEA); Twillo (US, UK including non-EEA processing); Sendgrid (US, UK, including non-EEA processing); Cisco (Contact Centre); ServiceNow (Support)	
CreateTeam Modality Microsoft	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 lealtonship management purposes.	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	ID info	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)	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	(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 Twillio: SMS solution; SendGrid - email solution; Gisco (Contact Centre); ServiceNow (Support)	globally, non-EEA processing) Microsoff (non-EEA processing including US). Nasstar Group may process personal data through its subsidiaries in the US, Australia and Malaysia. Pexip (EEA); Twillo (US, UK including non-EEA processing); Sendgrid (US, UK, including non-EEA processing); Cisco (Contact Centre); ServiceNow (Support)	Microsoft CSP Portals are
CreateTeam Modality Microsoft	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. C Business contact details (e.g., name, job title, company name and business e-mail address/phone number and records of	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	ID info	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)	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	(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 Twillio: SMS solution; Cisco (Contact Centre); ServiceNow (Support) Microsoft Azure cloud hosting for CSP Portals. Cloudmore CDP	globally, non-EEA processing) Microsoff (non-EEA processing including US). Nasstar Group may process personal data through its subsidiaries in the US, Australia and Malaysia. Pexip (EEA); Twillo (US, UK including non-EEA processing); Sendgrid (US, UK, including non-EEA processing); Cisco (Contact Centre); ServiceNow (Support)	Microsoft CSP Portals are hosted in the UK/EU/EEA. Microsoft (Azure)-resident application hosted in the
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Modality Microsoft Licencing Modality Project Based Professional and Support	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. C 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	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	ID info	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)	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	(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) Microsoft Azure cloud hosting for CSP Portals. Cloudmore Cloudmore CSP Portal Actiance - Compliance Recording; AGAT - Sphereshield AGAT - Sphereshield (Security	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 Actiance - India and US	Microsoft CSP Portals are hosted in the UK/EU/EEA. Microsoft (Azure)-resident application hosted in the EU/EEA. Modality may use this Authorised Sub-Processor to provide products and services to customers. Modality may use this
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Modality Microsoft Licencing Modality Project Based Professional and Support	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. C 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	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	ID info	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)	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	(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) Microsoft Azure cloud hosting for CSP Portals. Cloudmore Cloudmore CSP Portal Actiance - Compliance Recording; AGAT - Sphereshield AGAT - Sphereshield (Security	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 Actiance - India and US	Microsoft CSP Portals are hosted in the UK/EU/EEA Microsoft (Azure)-resident application hosted in the EU/EEA. Modality may use this Authorised Sub-Processor to provide products and services to customers. Modality may use this Authorised Sub-Processor to Authorised Sub-Processor to Authorised Sub-Processor to Modality may use this Authorised Sub-Processor to
Modality Microsoft Licencing Modality Project Based Professional and Support	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. C 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	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	ID info	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)	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	(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) Microsoft Azure cloud hosting for CSP Portals. Cloudmore Cloudmore CSP Portal Actiance - Compliance Recording; AGAT - Sphereshield AGAT - Sphereshield (Security	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 Actiance - India and US AGAT - Israel (EU Adequacy Decision)	Microsoft CSP Portals are hosted in the UK/EU/EEA. Microsoft (Azure)-resident application hosted in the EU/EEA. Modality may use this Authorised Sub-Processor to provide products and services to customers. Modality may use this Authorised Sub-Processor to provide products and services to customers.
Modality Microsoft Licencing Modality Project Based Professional and Support	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. C 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	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	ID info	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)	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	(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) Microsoft Azure cloud hosting for CSP Portals. Cloudmore Cloudmore CSP Portal Actiance - Compliance Recording; AGAT - Sphereshield AGAT - Sphereshield (Security product)	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 Actiance - India and US AGAT - Israel (EU Adequacy Decision)	Microsoft CSP Portals are hosted in the UK/EU/EEA. Microsoft (Azure)-resident application hosted in the EU/EEA. Modality may use this Authorised Sub-Processor to provide products and services to customers. Modality may use this Authorised Sub-Processor to provide products and services to customers. Modality may use this Authorised Sub-Processor to Authorised Sub-Processor to Modality may use this Authorised Sub-Processor to
Modality Microsoft Licencing Modality Project Based Professional and Support	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. C 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	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	ID info	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)	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	(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) Microsoft Azure cloud hosting for CSP Portals. Cloudmore Cloudmore CSP Portal Actiance - Compliance Recording; AGAT - Sphereshield AGAT - Sphereshield (Security product) Altigen - Contact Centre in the	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 Actiance - India and US AGAT - Israel (EU Adequacy Decision)	Microsoft CSP Portals are hosted in the UK/EU/EEA. Microsoft (Azure)-resident application hosted in the EU/EEA. Modality may use this Authorised Sub-Processor to provide products and services to customers. Modality may use this Authorised Sub-Processor to provide products and services to customers. 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)	other things)	Nasstar will process in order to perform certain services (e.g. number called,	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	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of Customer Data by Nasstar as Processor*	Additional Info
			date/time, duration of call)	content data)				
						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 &	UK	
							UK	
						(ACM content) 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	Р	P	Р

	CRM Data (this is the personal data of representatives with whom	User Data (this is focussed on a customer's end users e.g. their	Communications Data (this will include a range of traffic and location data that	Content Data (this would cover a range of data that is processed in the provision of	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of Customer Data by Nasstar as Processor*	Additional Info
Nasstar Product/Service	Nasstar interacts for marketing and customer relationship purposes)	contact details and authentication details, among other things)	Nasstar will process in order to perform certain services (e.g. number called, date/time, duration of call)	Nasstar's services but which is created by users – ranging from video, call and email content data)				
	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, Virgin Media - PSTN access circuits, Virgin Media - PSTN access circuits. Xtel - on-site engineering services. Cisco Call Recording. Calls to the Support are recorded using Gisco 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, Masterdam, U.S, 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 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 B28 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 Nasattan 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 ie. 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 U.S. 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 U.S. 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 inited in the UK.
Smart Messenger including SMS, Smart Chat, Smart Vouchers and	С	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 BZB marketing, billing and customer relationship management purposes.	+ third parties (e.g.	ID if available, Message	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 Masstar 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 B28 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 Mobils Gelf 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 Talk including C P P P P P P P P P	in means that Customer data may be processed in the US, Australia, India and Singapore Cisco Call Recording. Calls to the Support are recorded to using Cisco Call Recording for quality improvement purpose or se. P ServiceNow provide support for managed services which im eans 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 a-	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.
Customer's admin and related decommonulations and details address/phone number and records of correspondence/marketing, billing and customer relationship management purposes. PCI – Nasstar AgentPay, SecureContract, VoicePay Business contact details (e.g., name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar forup for the purpose of sending B2 marketing, billing and customer relationship management purposes. PCI – Nasstar AgentPay, SecureContract, VoicePay Customer's PSP. any end-user data processed through of the Nasstar contact details (e.g., name, job title, company name and business e-mail address/sphone number and records of correspondence/marketing) for Nasstar's Customer contact(s)) which is used by Nasstar Group for the purpose of sending B2 marketing, billing and customer relationship management purposes. PCI – Nasstar AgentPay, SecureContract, VoicePay Customer's PSP - any end-user data processed through other 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 PSP - any end-user data processed through other Nasstar's Customer's PSP. Customer's PSP. any end-user data processed by Nasstar contact centre of the Customer's PSP. AgentPay & VoicePay). Compilate Todatca tan and data or about other users in the form of Content Usata and and screen recording. The file of Parket Agent Pay Agent Pay Reported State and the State Contact Pay Agent Pay Reported State and the State Contact Pay Pay Report Pay	if or managed services which means that Customer data may be processed in the US, so Australia, India and Singapore Cisco Call Recording. Calls to the Support are recorded to using Cisco Call Recording for quality improvement purpose or see. P ServiceNow provide support for managed services which in 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 so quality improvement purpose	Boom Limited's data-centres in the UK and the Netherlands and Level 3 and Level 4 support is provided by Boom Limited. 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.
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 Talk or Nasstar Solutions e.g. Nasstar Talk or Nasstar Solutions e.g. Contact Centre purposes. SecureContract, VoicePay 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's PSP - any end-user data is passed to the Customer's PSP. Computer & Communica Co. Limited (C3). PCI compliant products and centres in the UK (for pagnitum purposes.) Compiling 2B marketing, billing and customer relationship management purposes.	for managed services which imeans that Customer data may be processed in the US, Australia, India and Singapore Cisac Call Recording. Calls to the Support are recorded using Cisco Call Recording for a quality improvement purpose a a-	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.
name, job title, company name and business e-mail address/phone number and records of correspondence/marketing) for Nasstar' Scutomer contact(s) which is used by Nasstar Group for the purpose. Nasstar Goustomer relationship management purposes. Hrough these Nasstar solutions and payment card data is parsed to the Customer's PSP. any end-user data is parsed to the Customer's PSP. Compiler & Customer's PSP. Customer's PSP. Compiler & Customer's PSP. Customer's	for managed services which imeans that Customer data may be processed in the US, Australia, India and Singapore Cisac Call Recording. Calls to the Support are recorded using Cisco Call Recording for a quality improvement purpose a a-	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.
the Support are recorded using Cisco Call Recording quality improvement pur	to pr	
PCI - Nasstar WebPay C P P P P P P P P P P P P P P P P P P	P ServiceNow provide support	P Chatbot uses Converse 360
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. customers - Chat content (e.g. dustomers - any Chat content (e.g. messages/conversations) 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 or requested by Nasstar to perform the services and Nasstar is not the controller of any sensitive data color of sending B2B marketing, billing and customer relationship management purposes.	in 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 to	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 P C P P C P P	ServiceNow provide support	P Customer data is held on
address/phone number and records of records of correspondence/marketing) for Nasstar's Customer contact(s)) which is used by Nasstar Group for the purpose of sending BZB marketing, billing and customer relationship management purposes. Indian August Called number	lin 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	
Internet Access C P P C & P P Business contact details (e.g., Business contact details (e.g., Contact details for the Business contact details (e.g., Contact details for the Business con	P ServiceNow provide support	P Support is managed through
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 admin and related commmunications Customer's admin and related commmunications Data routing information, Usage History / Log Details; Data routing information, Usage History / Log Details; Data routing information, Usage History / Log Details; Comms365 - CPF manage portal, 3rd line support - delivery of SIM cards to customers Cisco Call Recording. Ca the Support are recorded using Cisco Call Recording quality improvement pur Rapid Network C & P P P C & P P	in means that Customer data may be processed in the US, Australia, India and Singapore Cisco Call Recording. Calls to the Support are recorded ent using Cisco Call Recording for quality improvement purpose to	Comms Data is stored in Hortium (UK) & ServiceNow (London, Amsterdam, US,

	CRM Data	User Data	Communications Data	Content Data (this would	Other (incl. Sensitive Data)	Authorised Sub-Processors	Non-EEA Processing of	Additional Info
	(this is the personal data of	(this is focussed on a	(this will include a range of	cover a range of data that is	Street (men sensitive sata)	radionisca sab i roccissors	Customer Data by Nasstar as	Additional line
	representatives with whom Nasstar interacts for	customer's end users e.g. their contact details and	traffic and location data that Nasstar will process in order	processed in the provision of Nasstar's services but which is			Processor*	
Nasstar Product/Service	marketing and customer	authentication details, among	to perform certain services	created by users – ranging				
	relationship purposes)	other things)	(e.g. number called, date/time, duration of call)	from video, call and email content data)				
	Dueiness content details (c. c.	Contrat dataile for the	ID Address is started for	NI/A	ID address is used for status	Complete Name Company in	Coming Name and discount of	Command in an arranged About the
	Business contact details (e.g, name, job title, company	Contact details for the Customer's admin and related	IP Address is stored for remote management and	N/A	IP address is used for status monitoring (C) and remote	ServiceNow. Support is managed using ServiceNow	ServiceNow provide support for managed services which	Support is managed through Autotask (UK & EEA) and
	name and business e-mail address/phone number and	commmunications	support.		support and management (P). No sensitive data.	(with customer data hosted in London and Amsterdam).	means that Customer data may be processed in the US,	ServiceNow (London, Amsterdam, US, Australia,
	records of				No sensitive data.	Autotask. Support		India and Singapore) and
	correspondence/marketing) for Nasstar's Customer					management (UK & EEA). Hortium. Stores Comms Data.	Cisco Call Recording. Calls to the Support are recorded	Comms Data is stored in Hortium (UK) & ServiceNow
	contact(s)) which is used by					Comms365 - CPE	using Cisco Call Recording for	(London, Amsterdam, US,
	Nasstar Group for the purpose of sending B2B marketing,					management portal, 3rd line support + delivery of SIM	quality improvement purpose.	Australia, India and Singapore).
	billing and customer					cards to customers		
	relationship management purposes.					Cisco Call Recording. Calls to the Support are recorded		
						using Cisco Call Recording for		
						quality improvement purpose.		
MPLS Managed Network	c	P	P		C & P	P	P	P
Services	Purinary content division	Contact dotalla facili	ID Addross in atoms ()	N/A		ConsisoNov. Cores 11.	Sondenboy	Support is managed to the control of
	Business contact details (e.g, name, job title, company	Contact details for the Customer's admin and related	IP Address is stored for remote management and	N/A	IP address is used for status monitoring (C) and remote	ServiceNow. Support is managed using ServiceNow	ServiceNow provide support for managed services which	Support is managed through Autotask (UK & EEA) and
	name and business e-mail	commmunications	support.		support and management (P).	(with customer data hosted in	means that Customer data	ServiceNow (London,
	address/phone number and records of				No sensitive data.	London and Amsterdam). Autotask. Support		Amsterdam, US, Australia, India and Singapore) and
	correspondence/marketing) for Nasstar's Customer					management (UK & EEA).		Comms Data is stored in
	contact(s)) which is used by					SupportWorks. Support management	the Support are recorded using Cisco Call Recording for	Hortium (UK).
	Nasstar Group for the purpose of sending B2B marketing,					Hortium. Stores Comms Data. BT Wholesale, TalkTalk	quality improvement purpose.	
	billing and customer					Business + VIrgin Media.		
	relationship management purposes.					Wholesale carrier of access circuits.		
	parposes.					Xtel, Infradata + Commscare.		
						Onsite engineering services. Cisco Call Recording. Calls to		
						the Support are recorded		
						using Cisco Call Recording for quality improvement purpose.		
Nasstar Connect DMMA	6	n	n		C & P	n		D.
Nasstai Connect Divilvia	C		r		Car	<u></u>	-	
	Business contact details (e.g, name, job title, company	Contact details for the Customer's admin and related	IP Address & MAC address is stored for remote	N/A	IP address is used for status monitoring (C) and remote	ServiceNow. Support is managed using ServiceNow	ServiceNow provide support for managed services which	Support is managed through Autotask (UK & EEA) and
	name and business e-mail	communications	management and support		support and management (P).	(with customer data hosted in	means that Customer data	ServiceNow (London,
	address/phone number and records of		(when using NAT) and originator's IP address may be		No sensitive data.	London and Amsterdam). Autotask. Support	may be processed in the US, Australia, India and Singapore.	Amsterdam, US, Australia, India and Singapore) and
	correspondence/marketing)		held.			management (UK & EEA).	Cisco Call Recording. Calls to	Comms Data is stored in
	for Nasstar's Customer contact(s)) which is used by					SupportWorks. Support management	the Support are recorded using Cisco Call Recording for	Hortium (UK).
	Nasstar Group for the purpose					Hortium. Stores Comms Data.	quality improvement purpose.	
	of sending B2B marketing, billing and customer					Xtel, Infradata + Commscare. Onsite engineering services.		
	relationship management					Cisco Call Recording. Calls to		
	purposes.					the Support are recorded using Cisco Call Recording for		
						quality improvement purpose.		
National Business Leased	С	NA	NA	NA	NA	Р	Р	Р
Lines; Hosting Services (Colocation); and								
Broadband Services								
	Business contact details (e.g,	NA	NA	NA	NA	ServiceNow. Support is	ServiceNow provide support	Support is managed through
	name, job title, company					managed using ServiceNow	for managed services which	ServiceNow (London,
	name and business e-mail address/phone number and					(with customer data hosted in London and Amsterdam).	means that Customer data may be processed in the US,	Amsterdam, US, Australia, India and Singapore).
	records of					Cisco Call Recording. Calls to	Australia, India and Singapore.	
	correspondence/marketing) for Nasstar's Customer					the Support are recorded using Cisco Call Recording for	Cisco Call Recording. Calls to the Support are recorded	
1	contact(s)) which is used by					quality improvement purpose.	using Cisco Call Recording for quality improvement purpose.	
1			•	I	İ		quanty improvement purpose.	
	Nasstar Group for the purpose of sending B2B marketing,							
	Nasstar Group for the purpose of sending B2B marketing, billing and customer							
	Nasstar Group for the purpose of sending B2B marketing,							
Professional Services -	Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management	NA NA	NA NA	NA NA	P	NA	NA	NA
Professional Services - Implementation	Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management	NA .	NA .	NA NA	P	NA .	NA .	NA
	Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management	NA .	NA	NA	P	NA .	NA .	NA .
Implementation Assessment (Security and	Nasstar Group for the purpose of sending B2B marketing, billing and customer relationship management	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 BZB marketing, billing and customer relationship management purposes.		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