

At Ascendant Solutions Limited, data privacy comes first and is very important to us. On the 25th May 2018, the new General Data Protection Regulation went into effect in the UK as the <u>Data Protection Act 2018</u>, giving people more control over how their data is used. It introduces new responsibilities, including the need to demonstrate compliance, more stringent enforcement and substantially increased penalties than the previous Data Protection Act, which it supersedes.

Ascendant Solutions Limited is committed to high standards of information security, privacy and transparency, we work closely with our customers and clients, to ensure the data supplied to us is used only for its intended purpose, once we have processed the data given to us and it has been returned, it is then destroyed in our systems after the appropriate retention period.

Ascendant Solutions Limited are the Data Processor of your data, the Data Controller is the business partner we work on behalf of. You do have the right to access information that Ascendant Solutions Limited hold about you. Any requests must be made by email to the data security manager. If you require information that our business partner(s) hold about you then you should contact them directly.

All data transfer must comply with Ascendant Solutions Limited's <u>Cryptographic</u> <u>Controls Policy</u>. We then operate under instruction through our client's policies and procedures on processing the data and deletion processes. Approved external suppliers Supplier comply with our <u>Supplier Security Policy</u> or have a current ISO 27001 accreditation and will only be processed with express consent of the client.

No personal data will be held in our system for longer than our client requests, save for the sole exception of client requests contradicting legislation. Personally identifiable information and sensitive information will not be stored for longer than relevant or necessary for the purposes of providing services to clients.

Ascendant Solutions Limited may provide details to Credit Reference Agencies for information about you and any financial associate, if you have one, for example, a person with whom you have, or have had, joint personal financial arrangements such as joint accounts, or have made joint credit applications.

Ascendant Solutions Limited may also obtain information from Credit Reference Agencies to trace customers, to obtain certain credit application data and to prevent money laundering and /or fraud. We may also search public records such as the Electoral Roll, that are available from Credit Referencing Agencies to help us verify your identity.



Any Credit Referencing Agency Data provided to, or purchased by Ascendant Solutions Limited shall never be used for any purpose outside of the relevant client's express instructions and the constraints of applicable legislation.

Our Credit Referencing Agency data suppliers privacy notices can be found here:

TransUnion (Formerly CallCredit) https://www.callcredit.co.uk/legal-information/bureau-privacy-notice Equifax - https://www.equifax.co.uk/ein.html Experian - https://www.experian.co.uk/consumer/dsar/privacy.html Creditsafe - https://www.creditsafe.com/gb/en/legal/privacy-policy.html

Other Suppliers to Ascendant Solutions Limited:

Ascendant Solutions Limited engage the services of other suppliers which may involve those suppliers being able to access or be supplied with some of your data. These suppliers are only used for the purposes of maintaining our systems and facilities or for obtaining other data that you have consented for them to provide.

# Your Data Rights -

The Right to Be Informed – (Article 14, GDPR) We make available an explanation of how your data will be processed. This is in the form of this Privacy Policy. The Right to Access (Article 15, GDPR) – You have the right to access your personal data being processed; from 25th May 2018, you do not have to pay a fee for this unless we have previously supplied the requested data from you. You will need to complete a Data Subject Access Request form and supply proof of your identity. We must provide you with the data no later than one month after receiving your fully completed request. You need to make your request in writing by letter or email to the address at the end of this document. We will then send you the form to complete along with details of the identity documents we require.

You also have the right to withdraw consent at any time, where this doesn't affect the legitimate interests and lawfulness of processing.

# Automated Decision Making

Ascendant Solutions Limited does not use automated decision making in our role as data processor.

Some Acts of Parliament oblige Ascendant Solutions Limited to disclose customer information to certain bodies with statutory powers.



To assure our clients and customers further of our stance towards data security, Ascendant Solutions are ISO 27001 accredited in keeping with our commitment to constantly build on existing security and business continuity management systems and certifications. Our policies and procedures are available to view on request contacting the Data Security Manager via email and If you have any questions about this privacy statement, please contact us in the first instance.

Ascendant Solutions will comply with applicable GDPR regulations as a data processor from effect of 25th May 2018. Working in conjunction with our clients, we will explore opportunities within our services offerings to assist our customers to also meet their GDPR obligations.

# Log Information

When you visit our online services (FTPs, Websites, APIs etc) we collect standard internet log information and details, such as:

- Date and time of your visit;
- type and version of the browser you use;
- operating system;
- your Internet Protocol (IP) address

- the full URL clickstream to, through and from our website (e.g. websites that you have visited and products viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page);

- time zone setting; and
- plug in types and version for system administration.

We have a legitimate interest in this data since it enables us to further develop and enhance our services, diagnose any issues, identify and prevent malicious or illegal activity. We do not make any attempt to find your identity as a result of your visit to our website. We will not associate any data collected in this way with any personally identifying information from any other source in order to identify you.

# **Cookies**

Our online services make use of Cookies, Pixel Tags, Local Shared Objects (also called "Flash Cookies") and similar technologies when you are browsing our website to enable certain functionalities of our website and to help us analyze user behavior on the website in order to improve the customer experience.



You can prevent cookies from being installed by adjusting the settings on your browser software accordingly. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our online services.

## Use of Content Delivery Networks (CDNs) including web proxy

Ascendant Solutions online services are often delivered via a Content Delivery Network. This increases data protection by providing anonymity to our origin servers and can improve service delivery by caching requests for common public resources such examples include: artwork including logos, audio recordings for our telephony systems (IVR Greetings, Hold music etc.) Our approved CDNs are:

Microsoft (Microsoft Ireland Operations Limited) Privacy Policy

Cloudflare Inc Privacy Policy

Google Privacy Policy

# Use of Third Party Code and Libraries

Ascendant Solutions acknowledges use of third party code is inevitable, we commit to ensuring that:

- Third Party code use is restricted to a minimum
- We will self-host third party software wherever possible and lawful to avoid user connections to external parties. E.g. FontAwesome is served from our servers, avoiding user browsers connecting to third party servers.
- Use of approved suppliers and CDN providers will always be selected over unapproved providers regardless of performance penalties. E.G. Microsoft .NET libraries used for JSON as opposed to NewtonSoft.
- We use Google libraries for Data Visualisation (charts). Google do not permit self-hosting for related code meaning your browser will send requests to Google for the code required to generate charts Google's privacy promise: "all code and data are processed and rendered in the browser. No data is sent to any server." Google <u>Privacy Policy</u>

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