



... Analysis to Impact ...



## Data Privacy Policy

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**Astario Systems Ltd**

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## Introduction

This policy explains the personal data collect by Astario in relation to the delivery of client services and how any data is used.

There is a distinction between personal data which Astario collects, and personal data we might receive and process within contracted services for clients.

If you are not a current client, the section '[Data where Astario is the Controller](#)' is more relevant to you, as it defines data collected and used for our own purposes.

If you are a current client or interested in our data policies, data held, and processed within our client services, please view the section '[Data where Astario is the Processor](#)'.

## Personal Data Definition

The ICO's definition of Personal Data is data relating to an identified or identifiable individual.

If it's possible to identify an individual from data, and that data relates to an individual, then the data is deemed personal data. Even if data doesn't directly identify an individual but it might indirectly identify an individual it is still considered personal data.

## Where this policy applies

This data privacy policy applies to all data provided to us via our website, via an Astario system, or via Astario team members or any Astario personnel. It is also applicable to personal data received from clients and partners.

This data privacy policy does not apply to any data processing activities of other organisations, even if Astario plays a part in the redirection to other organisations via our website or other means.

## Data where Astario is the Controller

Where Astario collects data for its own business purposes, it is defined as the Controller for that data.

Data controllers are responsible for ensuring they collect, hold, and process data in a responsible manner, in line with legal requirements.

This section describes how Astario handles data, and your rights if we are storing your data.

### Types of data we collect

Astario collects a number of types of personal data under certain circumstances. These include:

- Data about your use of the Astario website, provided by Google Analytics
- Data which you provide to us directly via any medium
- Data gathered when you communicate with us or we communicate with you
- Data we receive from third parties (including clients and partners)

### How we use this data

Astario may use your data for the following purposes:

- Storing your data securely on the Salesforce.com platform or any other host platforms, on which Astario provides its business applications.
- Generating website and service usage data (for example, number of page views, number of downloads etc.)
- Granting you access to website pages, documentation, and content
- Sending you relevant content (where you give us permission to do so)
- Contacting you to discuss our services (where you give us permission to do so)
- In the organisation of events, producing attendee lists for events (where you sign up for our events).
- Controlling access to Astario systems and protecting data held on Astario systems
- Generating internal marketing data (e.g. the number of people who have requested calls in the last month)

### Disclosure of your data to third parties

Astario will only disclose your data to third parties under specific circumstances. These are:

- Where we are required to for legal reasons
- With our partners, on the condition that partners act in accordance with both this data privacy policy and relevant legislation

We will not disclose data to other third parties for the purposes of direct marketing.

## Retention Schedule

The period of data retention depends on the type of data:

Type of Personal Data	Retention Period
Contact Data of prospective clients	2 Years after last successful contact OR Immediately if confirmed out of date
Contact Data of active and former clients	5 Years after last successful contact OR Immediately if confirmed out of date
Contact Data of the primary contact associated with Astario trial systems.	2 Years after last successful contact OR Immediately if confirmed out of date
'Do not Contact' requests	All data except the email address is deleted when the 'Do Not Track' request is actioned. The email address and/or phone number is retained indefinitely in order to ensure we comply with the request made but may not be linked to any other personal data.
Job Applications, CVs	2 years after receipt. The personal data of successful candidates is stored as per the Astario Data Security Policy.

## Your Rights

If you believe that we hold erroneous, incomplete, or outdated data for you, you may request correction or deletion.

You may also request a copy of all data we hold on you.

You may request that we delete or do not process your data and, provided there is a legal basis to do so, we will comply.

Finally, you are in control of the circumstances under which we contact you, and the manner in which we use your data for this purpose. Please note that if you request that we do not contact you again, we will retain a record of your contact details specifically in order to avoid contacting you. We will not use this data for any other purpose.

**If you'd like to request any of the above changes please contact us using the details below.**

## Data where Astario is the Processor

In the context of delivery of services to clients, Astario acts as Data Processor. We may receive, hold, and process your personal data if it is provided to us by a client, or if it is necessary to fulfil agreed contractual activities on behalf of a client.

More details of the contractual terms governing the processing of personal data are available within our Terms and Conditions, or within the specific contract we have with the client. These terms require our clients to comply with the law when providing us with personal data.

The client remains the designated Data Controller, and defines the circumstances and scope of the processing which Astario undertakes on its behalf.

## Types of data Astario receives

Astario may receive personal data during service delivery. These include:

- Personal data which is provided to us by clients
- Personal data which is contained within data sent to us by clients
- Data gathered when you communicate with us or we communicate with you
- Data about your use of Astario Services and Systems
- Data which you provide to us via online forms or registrations

For more details about specific types of personal data we may collect and process during our activities, please see Appendix 1 below.

## How Astario use and/or process this data

Astario may use your data for the following purposes:

- Generating system usage data
- Controlling access to Astario Systems and protecting data held on Astario systems
- Delivery of services, data products, and analysis to the client as contractually agreed
- Contacting you on behalf of the client, as contractually agreed with the client

## Disclosure of personal data to third parties

Astario will only disclose personal data to third parties under specific circumstances. These are:

- Under the instruction of the client, acting in their capacity as data controller (Astario will advise clients if it believes that an instruction risks breaching legislation or contractual agreement)
- Where we are required to do so for legal reasons
- With Salesforce.com, in the context of storing data on the Force.com cloud services platform subject to the Astario Standard Terms and Conditions.
- Where it is strictly necessary to do so for Astario to fulfil agreed contractual activities as a data processor (for example during any data research activities which directly support Astario services to the client)

## Retention Schedule

Where Astario is the data processor, we store data only as agreed with the client (the data controller). We delete client data within 1 month of the end of a contract, unless otherwise agreed with the client.

We retain contact data associated with former clients for audit and accountability purposes, but this data is not used for marketing purposes.

## Your Rights

Clients may request that we transfer data which they have provided to another organisation and we will comply, provided there is a legal basis to do so.

If you believe that we have erroneous, incomplete, or outdated data relating to you, you may request that it be corrected or deleted.

You may also request a copy of all data we hold on you.

You may request that we delete or do not process your data and, provided that there is a legal basis to do so, we will comply. If we are processing data for a legitimate purpose on behalf of a client, we may under certain circumstances be entitled to refuse to delete or restrict our processing of your data.

Finally, you are in control of the circumstances under which we contact you, and the manner in which we use your data to do so. Please note that if you request that we do not contact you, we will indefinitely retain a record of your contact details specifically in order to avoid contacting you. We will not use this data for any other purpose.

**If you'd like to request any of the above changes please contacting us using the details below.**

Please note that we are likely to consult with our client prior to responding to you. Accordingly, a response to requests may alternatively be received from our client as they, being assigned data controller, determine the basis of our processing on your data.

## Contact Details

Requests relating to personal data will be responded to within 1 month, although we endeavour to respond more quickly where it is possible to do so.

### Enquiries

For enquiries about data protection and privacy, you can contact us in a number of ways:

**Address:** Astario  
Britannia House,  
Van Road,  
Caerphilly,  
CF10 1EW

**Phone:** 0330 350 3580

**Email:** [support@astario.co.uk](mailto:support@astario.co.uk)

### DPO Contact Details

Our data protection officer is Emeric Gabor, contactable using the details above contact.

### Complaints

If you have concerns, please raise them with the Data Protection Officer, above.

If you are dissatisfied with our response, you can also make a complaint to the UK's supervisory authority, the [Data Commissioner's Office \(ICO\)](#).

# Appendices

## Appendix 1 – Types of data Astario processes on behalf of clients

Astario routinely receives and processes a variety of types of data as part of the services it provides to clients, some of which contain personal data. This section is intended to summarise these types of data, how Astario processes them, and the purpose of processing.

Type of Data	Processing Conducted	Purpose of Processing
Name and corporate email address of users of an Astario system	Name and email are stored and linked to an Astario system activity data such as IP address, date, time, edits.	To authenticate access to the Astario system, and audit access to data stored in an Astario system.
Contact details of individuals who register on a client's customer/supplier/partner portal.	They are linked to data records held in an Astario system.	To enable clients to record customer/supplier/partner engagement with their Astario system, including entering data against any data records.
Contact details of individuals which a client requests that we record in the Astario system.	Name, email, phone, and other contact data given is stored.	To enable Astario to communicate with customers/suppliers/partners via email where they have registered an interest in receiving such communications.
	These are linked to an Astario system activity data such as IP address, date, time, edits.	To authenticate access to the Astario system, and audit access to data stored in an Astario system.
Name, address, postcode of individuals who provide services to or engage with a client, via an Astario system.	Data is stored and associated with any data records. This processing occurs on an Astario System, hosted by Salesforce.	To enable clients to analyse and report on data.
	Customer/Supplier/Partner names may be submitted to an external data provider for any data enrichment required. This processing is initiated by Astario, and conducted as per the data provider's terms.	Where a customer/supplier/partner is registered to an external data source such as Companies House, to enrich the data in the system.
	Customer/Supplier/Partner postcodes are correlated with the ONS Postcode database. This processing is conducted at Astario.	To enrich supplier data with any geographical segmentation or data assignments.

	<p>Customers/Suppliers/Partners are linked to an Astario Database storing data from all clients who use a data collaboration function or sharing service. This processing is conducted by Astario.</p>	<p>Where the same entity is used by multiple clients, Companies House updates are applied to all versions of that entity.</p> <p>Only Astario employees with justification to do so may access the Astario Database. Astario takes reasonable measures to remove unused records from the Database, where doing so will not impede services to clients.</p>
<p>Other potentially personally identifiable data received via Astario applications. This might include individual names or contact details within data records.</p>	<p>Other personally identifiable data is recorded, but is not subjected to processing. This data is stored on an Astario system, hosted by Salesforce.</p>	<p>Data not targeted for processing. Data is stored in the system as provided, and may be reported upon or interrogated by system users.</p>

Astario stores client data within the secure Salesforce.com platform. Access is restricted to only Astario employees who need access in order to support the client, and to users directly requested and authorised by the client.