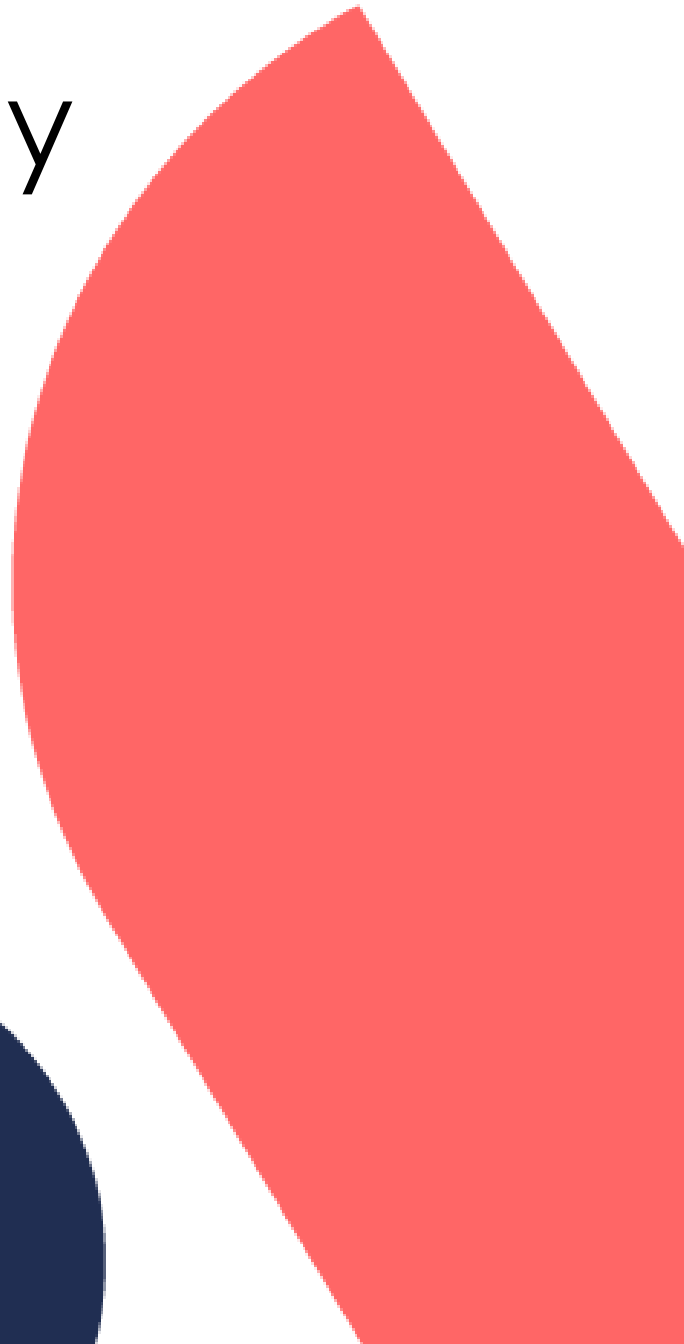
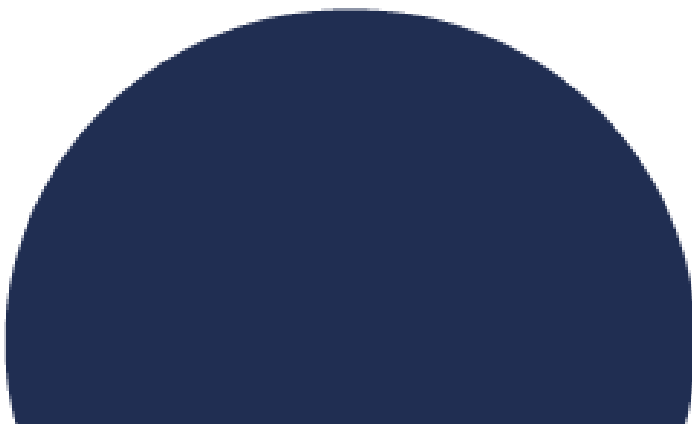




# Privacy Policy



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# 1. Policy Statement

ANS Group Limited ("ANS", "us", "we" or "our") is committed to respecting your privacy and to complying with applicable data protection and privacy laws.

We have provided this Privacy Policy Statement to help you understand how we collect, use and protect your information when you visit our websites, attend our events, attend our data centres for a data centre tour, download our whitepapers, watch our webinars, apply for a job role with us and when you generally use our products and services.

For the purpose of applicable data protection legislation (including but not limited to the UK Data Protection Legislation and to the extent applicable to the Customer's use of the Services to process Data the General Data Protection Regulation (EU) 2016/679 (the "GDPR"), the company responsible for your personal data is ANS Group Limited.

It is important to point out that we may amend this Privacy Policy from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.

If you are dissatisfied with any aspect of our Privacy Policy, you may have legal rights and we have described these as well.

You can visit our websites without disclosing any personally identifiable information about yourself (although please note that we may use cookies and collect other non-personally identifiable information about your browsing activity - see our cookie policy for detailed information).

If you do submit personal information by ordering products, services or completing a web form registration, for example, you can be assured that we will use your personal information as set out in this policy.

We wish to help you make informed decisions, so please take a few moments to read the sections below and learn how we may use your personal information.

# 2. Personal Data Collection

We endeavour to collect and use your personal information only with your knowledge and/or where required or permitted by applicable law, your consent and typically when you order and subsequently use products and services, make product or customer enquiries, register for information or other services, request product information, submit a job application or when you respond to communications from us (such as questionnaires or surveys).

We may also collect your information if you request a quote from us whether via a website form or via our live chat in which case it shall be within our legitimate interests to contact you (subject to any preferences expressed by you) to discuss a sale.

The type of personal information we may collect could include, for example, your name and postal address, date of birth, email address, telephone number, email address, credit/debit card information; and other information collected on registration or through surveys.

If you choose to provide us with personal information it will be used in support of the intended purposes stated at the time at which it was collected, and where appropriate, subject to any preferences indicated by you.

When you attend our offices or one of our data centres we may collect static or moving imagery via CCTV or surveillance systems and a photographic ID.

### **3. Non-personal Identifying Information**

We may also collect non-personally identifying information about your visit to our websites based on your browsing activities. This information may include the pages you browse and products and services viewed or ordered for example. This helps us to better manage and develop our sites, to provide you with a more enjoyable, customised service and experience in the future and to help us develop and deliver better products and services tailored to your individual interests and needs.

### **4. How will we use your information?**

We may use your information for a number of purposes which includes: processing your orders and managing and administering your account; delivering any services, products or information requested by you; responding to complaints, support tickets or account enquiries; administering debt recoveries; verifying your identity when required (you may lose your password or security information for example, and we may then need to ask you for other 'identifiable' information to protect your data from unauthorised access).

We may also undertake market research ourselves or via an authorised agent and product analysis based on your use of our services and products and contact you with information about new developments, products, services and special offers by post, telephone and automated means such as mobile text message (SMS), Email and the internet (subject to any preferences expressed by you).

From time to time, if you are a consumer rather than business to business customer and have consented accordingly, we may also store and use your information to contact you for marketing purposes. We or our authorised agent may contact you by email, phone or mail subject to any marketing preferences specified by you.

If you are business customer or prospective business customer, we may store and use your information to contact you for marketing purposes (relying on the soft opt in under applicable legislation) unless you specifically ask not to be contacted for such purposes.

If you have downloaded a whitepaper we may contact you by telephone to ask your views and feedback on the whitepaper you downloaded.

If you have attended one of our events we may contact you by telephone to ask your views and feedback on the event you attended.

If you have downloaded one of our webinars we may contact you by telephone to ask your views and feedback on the webinar you attended.

If you have consented to receive details of products and services, events and training you can contact us at any time to have your details removed from lists used by us for any or all of those purposes or from lists maintained by our recruitment team, to update your information or to otherwise tell us how you would like to receive information about our and/or third party products and services - the choice is yours.

To update your marketing preferences or to unsubscribe please email **dpo@ans.co.uk** and quote your account name, email address, and/or account number in the body of the email and tell us what you want us to do (i.e. 'opt-out Email', 'opt-out SMS' etc or if you have previously objected to receiving information by post for example, but would now like to change your mind and receive information then just say, 'opt-in post' in the subject header of your email).

We may use CCTV/surveillance imagery and any photographic ID for a number of purposes including but not limited to the following:

- To maintain the safety and security of our premises/data centres for our customers, customer data and employees
- To support the effective management of our premises/data centre operations and any incidents
- To respond to a subject access request

The lawful justification for collecting and using CCTV/surveillance imagery and any photographic ID is that there are legitimate interests to do so.

## 5. When will we disclose your information to others?

We may only disclose information about you and contact details to (i) companies within the ANS Group for the purposes and subject always to the terms of this Privacy Policy Statement; (ii) in the event that we undergo re-organisation or are sold to a third party, in which case you agree that any personal information we hold about you may be transferred to that re-organised entity or third party for the purposes and subject to the terms of this Privacy Policy Statement.

Please note that ANS does not sell or pass your personal information to third parties (other than as set out in this paragraph) unless you have given us permission or unless it is strictly necessary to deliver the products and services ordered or used by you. ANS may also be obliged to disclose your personal information to meet any legal or regulatory requirements (for example to comply with a court order) or obligations in accordance with applicable law or in response to a subject access request. We may disclose your data to a credit card company to validate your credit card details and obtain payment when you buy a product or service.

When you buy a product or service we may make a search with Credit reference agencies to assess your credit worthiness. The Credit reference agency may make a record of that search. We may also make a search on the personal credit file of all your principal directors/proprietors for the purposes of this application. This may include a search on current address and any previous addresses in the last three years.

For the purposes of credit referencing, fraud prevention and money laundering regulations we may also share your account information and trade payment performance with other carefully

selected third parties such as credit reference agencies. In requesting a quotation for services from us, you confirm to us that you have obtained the consent of all relevant individuals associated with your business to the processing of their personal data for the reasons stated above.

Should it become necessary for us to review your account, then a further credit reference agency search may be conducted and a record kept of that search.

We may also have to disclose some limited details to third party service providers, suppliers of software for audit reasons, processing of MDF claims from such third party suppliers and partners and/or when third party suppliers of software are involved in trouble-shooting on customer solutions.

## 6. Social media, blogs, reviews

Any social media posts or comments you send to us (on the ANS Facebook page, for instance) will be shared under the terms of the relevant social media platform (e.g. Facebook/Twitter) on which they are written and could be made public.

Other people, not us, control these platforms. We are not responsible for this kind of sharing. We recommend you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you will understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you are unhappy about it.

Any blog, review or other posts or comments you make about us, our products and services on any of our blogs, reviews or user community services will be shared with all other members of that service and the public at large. Any comments you make on these services and on social media in general must be not offensive, insulting or defamatory. You are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

## 7. Careers information

In submitting a job application and if you have provided your consent, we may contact you if there are other opportunities within ANS which we feel you may be interested in.

Further details are set out in the section below regarding for how long this information is kept if you are unsuccessful in your application(s). You can change your mind and withdraw this consent at any time.

Our privacy policy for job applicants can be found in Section 13 of this document.

## 8. How long do we keep your information for?

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes we acquired it for in the first place.

In most cases, this means we will keep your information for as long as you continue to use our services, and for a reasonable period of time afterwards if you stop doing so, to see if we can persuade you to come back to us. After that we will delete it other than where we lawfully can keep any data for audit or legal reasons.

We shall keep data on our prospect database for a reasonable period (which shall take into account whether you have had contact with us or otherwise actively engaged with us during that time) from receipt subject to an individual's right to unsubscribe or be forgotten at any time.

Active engagement shall mean if you are actively engaging with our online services where you communicate with us or click through from our marketing communications.

For job applicants, if your application for employment is unsuccessful, ANS will hold your data on file for 12 months after the end of the relevant recruitment process for legal/audit reasons. At the end of the 12 month period (if you have not provided consent under the successive paragraph or engaged in meaningful contact with us during that time) your data shall be deleted or destroyed.

During that period if you have not already done so as part of the application process (or engaged in other meaningful contact with us during that time) we may seek your consent to keep your data on file for a further 24 months to be able to contact you should an appropriate vacancy arise.

## 9. Access to your Information

You can write to us at any time to obtain details of the personal information we may hold about you or you may ask us to modify, update or delete such information. Please write to: [dpo@ans.co.uk](mailto:dpo@ans.co.uk) or Data Protection Officer, 1 Archway, Birley Fields, Manchester, England, M15 5QJ.

Please quote your name and address together with your mobile and/or account name (if relevant). We would be grateful if could also provide brief details of what information you want a copy of (this helps us to more readily locate your data).

We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

In certain situations (for example, where we have processed your personal data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will



minimise the chances of you being contacted in the future where your data is collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

## 10. Information Security

ANS recognises that its customers are increasingly concerned about how companies protect personal information from misuse and abuse and about privacy in general. ANS is constantly reviewing and enhancing its technical, physical and managerial procedures and rules to protect your personal data from unauthorised access, accidental loss and/or destruction. We use industry standard TLS certificates to provide encryption of data in transit, for example, all access to ANS's websites and management portals is covered by HTTPS.

Please be aware that communications over the Internet, such as emails/webmails, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered - this is the nature of the World Wide Web/Internet. ANS cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

## 11. Privacy Support

ANS reserves the right to amend or modify this Privacy Policy Statement at any time and in response to changes in applicable data protection and privacy legislation.

If we decide to change our Privacy Policy, we will post the changes on our website so you know what information we collect and how we use it. If at any point we decide to use personal information in a manner different from that stated at the time it was collected, we will tell you. You will have a choice as to whether or not we are able to use your information in this different manner.

If you have any enquiry about ANS's privacy policy or practices, please write to: Data Protection Officer, 1 Archway, Birley Fields, Manchester, England, M15 5QJ or send an email to: [dpo@ans.co.uk](mailto:dpo@ans.co.uk).

You can also contact the Information Commissioner if you have concerns about our data protection and privacy policy or practices. Their details are Information Commissioner's Office:

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF Phone: **0303 123 1113**



## 12. Monitoring and or recording of all your Communications

Monitoring or recording of your calls, emails, text messages and other communications may take place in accordance with English law, and in particular for business purposes, such as for quality control and training, to prevent unauthorised use of ANS's websites, to ensure effective systems operation and in order to prevent or detect crime.

[ANS Website](#)

## 13. PRIVACY NOTICE - Job Applicants

**Data controller: ANS Group Limited (company number 03176761) of 1 Archway, Birley Fields Manchester M15 5WJ.**

**Data protection officer: [dpo@ans.co.uk](mailto:dpo@ans.co.uk) or Data Protection Officer, 1 Archway, Birley Fields, Manchester, England, M15 5QJ.**

As part of any recruitment process, ANS collects and processes personal data relating to job applicants. ANS is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### 13.1. What information does ANS collect?

ANS collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which ANS needs to make reasonable adjustments during the recruitment process;
- equal opportunities monitoring information including information about your ethnic origin, sexual orientation and religion or belief;
- information about your criminal record; and
- information about your entitlement to work in the UK.

ANS may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or equal opportunities monitoring forms, or collected through interviews or other forms of assessment, including online tests.

ANS may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks.

Data will be stored in a range of different places, including on your application record, in management systems and on other IT systems (including our recruitment database).

### **13.2. Why does ANS process personal data?**

ANS needs to process data to take steps at your request prior to entering into a contract with you.

In some cases, ANS needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

ANS has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows ANS to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. ANS may also need to process data from job applicants to respond to and defend against legal claims.

ANS may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. ANS processes such information to carry out its obligations and exercise specific rights in relation to employment.

For some roles, ANS is obliged to seek information about criminal convictions and offences. Where ANS seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, ANS may keep your personal data on file in case there are future employment opportunities for which you may be suited. ANS will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

### **13.3. Who has access to data?**

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the legal team and recruitment team, interviewers involved in the recruitment process, managers, directors, and IT staff if access to the data is necessary for the performance of their roles.

If your application for employment is successful and ANS makes you an offer of employment, ANS will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

We may disclose information about you and your contact details to (i) companies within the ANS Group for the purposes of considering other opportunities which may exist for you within the ANS Group and subject to the terms of this Privacy Policy Statement; and (ii) in the event that ANS undergo re-organisation or are sold to a third party, in which case you agree that any

personal information ANS hold about you may be transferred to that re-organised entity or third party for the purposes of and subject to the terms of this Privacy Policy Statement.

For the purposes of this Privacy Policy Statement, "ANS Group" means any company or other entity in which ANS's ultimate holding company, Project Mountain Holdco Limited owns (directly or indirectly) more than 50% of the issued share capital.

ANS may also be obliged to disclose your personal information to meet any legal or regulatory requirements (for example with a court order or obligations in accordance with applicable law).

ANS will not transfer your data outside the European Economic Area.

### **13.4. How does ANS protect data?**

ANS takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Employees are restricted in their ability to, but not limited to, access any other departments' database; print documents, save work onto USBs. ANS also adopts a Data Protection Policy in line with the General Data Protection Regulation (GDPR).

### **13.5. For how long does ANS keep data?**

If your application for employment is unsuccessful, ANS will hold your data on file for 12 months after the end of the relevant recruitment process for legal/audit reasons.

At the end of the 12 month period (if you have not provided consent under the successive paragraph or not engaged with meaningful contact with us during this period) your data shall be deleted or destroyed.

During that period if you have not already done so as part of the application process (or have not engaged with meaningful contact with us during that period):

- we may seek your consent to keep your data on file for a further 24 months to be able to contact you should an appropriate ANS vacancy arise.

You can change your mind and withdraw such consent at any time.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in the form of our employee privacy policy.

## 13.6. Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require ANS to change incorrect or incomplete data;
- require ANS to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where ANS is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact our Data Protection Officer, contact details as shown above.

If you believe that ANS has not complied with your data protection rights, you can complain to the Information Commissioner.

## 13.7. What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to ANS during the recruitment process. However, if you do not provide the information, ANS may not be able to process your application properly or at all.

## 13.8. Automated decision-making

Recruitment processes are not based solely on automated decision-making.