

# Privacy Policy — Malta.

At Ascent, we take customer privacy very seriously. We are committed to the following privacy policy which demonstrates that any personal data we hold is done so in accordance with the UK General Data Protection Regulation (UK GDPR). We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to services we offer to individuals and our wider operations in the European Economic Area (EEA).

Please read this Privacy Policy carefully to learn about your rights, the information we collect and how we collect, use and protect it.

## **What categories of personal data do we collect?**

Personal data is any information relating to an identified or identifiable individual. The personal data we collect about you depends on the particular services we provide to you. We may obtain the following categories of personal data about individuals through the means described in this Privacy Policy.

The personal data we may collect includes:

- Contact details including name, company name, job title, work and mobile telephone numbers, work and personal email and postal address and information to check and verify your identity e.g date of birth.
- Professional details including job and career history, educational background, professional memberships and published articles.
- Your responses to surveys, competitions and promotions.

We collect and use personal data for the purposes described in the section ‘Why do we need personal data’ below. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

## **How do we collect personal data?**

- We obtain most of the personal data we collect directly from individuals in a variety of ways, including those that: complete our online forms, subscribe to our newsletters, register for training, webinars and meet ups,

attend meetings or events we host, visit our offices or for recruitment purposes.

- We obtain personal data indirectly about individuals from a variety of third parties, including recruitment services and our clients. This data is always obtained with the individual’s consent.
- Personal data may be obtained from publicly accessible sources such as Companies House, news articles, and internet searches.

We may also obtain personal data from cookies on our website—for more information on our use of cookies, please see our **Cookie Policy**.

## Why do we need personal data?

We aspire to be transparent when we collect and use personal data by telling you why we need it, this typically includes:

- Providing professional services — our services may include reviewing client files for data analytics which may involve processing personal data for the relevant client.
- Promoting our professional services, products and capabilities to existing and prospective business clients.
- Sending invitations and providing access to guests attending our events and webinars or our sponsored events.
- Administering, maintaining and ensuring the security of our information systems, applications and websites.
- Seeking qualified candidates, and forwarding candidate career inquiries to our HR team, which may be governed by different privacy terms and policies.
- Processing online requests, including responding to communications from individuals or requests for proposals and quotations.

## Does our website use cookies?

With prior consent, we use Google Analytics to collect information about our visitors. For more information please see our **Cookie Policy**.

## Do we share personal data with third parties?

We routinely share personal data with:

- companies within the Ascent group;
- third parties we use to help deliver our services to you, including Microsoft;
- other third parties we use to help us run our business;
- third parties approved by you, eg social media sites you choose to link your account to or third party payment providers;
- recruitment services providers.

## **Transferring your personal data out of the UK and EEA.**

It is sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

Where we transfer your personal data outside the UK and/or the EEA, we do so on the basis of an adequacy regulation or decision or (where that is not available) standard contractual clauses recognised by the UK and/or EU. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your personal data outside the UK and/or the EEA unless we can do so on the basis of an alternative mechanism or exception provided by applicable data protection law.

## **What are your data protection rights?**

- Access - the right to be provided with a copy of your personal data
- Rectification - the right to require us to correct any mistakes in your personal data
- Erasure (also known as the right to be forgotten) - the right to require us to delete your personal data (in certain situations)
- Restriction of processing - the right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
- Data portability - the right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party (in certain situations)
- To object - the right to object:
  - o at any time to your personal data being processed for direct marketing (including profiling);

- in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
- Not to be subject to automated individual decision making - the right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
- The right to withdraw consent - if you have provided us with consent to use your personal data you have a right to withdraw that consent easily at any time. Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn.

## **How do we protect personal data security and customer information?**

Appropriate technical and some additional organisational security policies and procedures are in place to protect personal data (including sensitive personal data) from loss, misuse, alteration or destruction. We are using dedicated technology for protection of personal data, by following internal data classification and handling guidelines. We aim to ensure that access to your personal data is limited only to those who need to access it whilst following the principle of minimisation. Those individuals who have access to the data are required to maintain the confidentiality of such information and follow internal data classification guidelines.

If you have access to parts of our websites or use our services, you remain responsible for keeping your user ID and password confidential. Please be aware that the transmission of data via the internet is not completely secure. Whilst we do our best to try to protect the security of your personal data, we cannot ensure or guarantee the security of your data transmitted to our site; any transmission is at your own risk.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **Changes to this Privacy Policy.**

We regularly review this Privacy Policy and will post any updates to it on this webpage.

## Revision History.

Revision Number	Date (dd-mmm-yyyy)	Author	Revision Details
1.0	01/11/2022	ISO	Update from Original New formats
1.1	24/11/2023	ISO	Minor changes Revision History section added
1.2	17/01/2025	ISO	Minor changes and updates

## How to contact us?

If you have questions or comments about this Privacy Policy with regards to how we handle personal data, or if you believe Ascent has not adhered to this Privacy Policy in any way and you would like to exercise your Data Subject Rights, please direct your correspondence to:

**Ascent Digital Services UK Ltd**  
**DeskLodge House, 2 Redcliffe Way, Bristol BS1 6NL**

Or via email:  
**dpo@ascent.io**

We aim to respond within 30 days from the date we receive privacy-related communications and may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This helps us to ensure that personal data is not disclosed to any person who has no right to receive it.

Alternatively, you may contact the UK Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/data-protection-complaints/> to report concerns you may have about our data handling practices.