

**Details of Personal Data Processing**

<b>Data subjects:</b>	Customer personnel Business contacts in general Other nominated contacts as made available by the Customer
<b>Types of personal data:</b>	Name Job title Business contact details (such as business address, business email address, business phone numbers) Any other personal data provided by Customer to Ultima
<b>Special categories of personal data:</b>	None
<b>Purpose of processing:</b>	IT hardware and software and related services provision
<b>Nature of processing:</b>	IT hardware and software and related services provision. As further set out in the body of the Agreement
<b>Sub processors</b>	In respect of: <ol style="list-style-type: none"><li>1. General Supply, Managed Services, Ultima Support Services, CSP Services and AntiSocial Engineer Services: Ultima sub-processors, who are not an Ultima Company, are contained in Annex 1 below.</li><li>2. Each Ultima Company at the date of this document is contained in Annex 2 below. Ultima Companies are defined as: Ultima and any company, which could be a UK or a non-UK registered entity, that is from time to time (a) a holding company of Ultima, (b) a subsidiary of Ultima, (c) a subsidiary of a holding company of Ultima, or (d) controlling, controlled by, or under common control with, Ultima or any of the aforementioned holding companies or subsidiaries. For the purposes of this definition the terms “holding company”, “subsidiary undertaking”, have the meanings given to them in the Companies Act 2006).</li></ol>

# Ultima Business Solutions Limited

## Data Protection Processing

### Annex 1 - Ultima Additional Sub Processor List

#### Ultima Sub Processor List

050LI Corporate Documents  
v1.9, 18/06/2025

Supplier / Vendor Name	Product/Technology/Service	Service High Level Overview	Data Storage Location	DR Location	Data Country	Cloud	Data Stored in Platform
<b>All Customers:</b>							
CheckPoint	Smart-1 Cloud	Firewall Management Services	Ireland (EEA)	EEA	EEA	SaaS	IP's, Host names, Policy data, Log Data, Configuration Information.
Check Point	Harmony Email & Office (O365 Security)	Security tool to detect malware/phishing/malicious content in emails & onedrive/Sharepoint	Ireland (EEA)	EEA	EEA	SaaS	Email including contents inbound/outbound.
Citrix	Citrix ShareFile	SaaS based Data Storage Solution	UK / EEA	UK / EEA	UK / EEA	SaaS	This is not a default storage location, Ultima can use ShareFile to securely share data.
Customer Thermometer	CSAT Reporting	customer feedback tool for various parts of the business	Distributed UK Datacentres (Rapidswitch)		UK	SaaS	Complaint / Feedback data - Company Name, ServiceNow Ticket Ref, User full name, IP address of end user (Public) at point of click submission.
Microsoft	Office 365 (And Wider Suite)		Geo Located UK/ EU	UK / EEA	UK / EEA	SaaS	Azure AD & Office365, Email and Administration. Hosting - UK (South), Ireland and Netherlands.
Microsoft	Dynamics 365	CRM Platform for Ultima	Geo Located EU		UK / EEA	SaaS	Customer Contract data, sales and invoicing data. Hosting - UK (South), Ireland and Netherlands.
Microsoft	Dynamics 365	Finance Platform for Ultima	Geo Located EU		UK / EEA	SaaS	Customer Contract data, sales and invoicing data. Hosting - UK (South), Ireland and Netherlands.
Mimecast	Email Security Gateway	Inbound/Outbound Mail relay incl security threat prevention features		UK	UK	SaaS	Email including contents inbound/outbound, mail content is archived there for BCP purposes
Delinea	Privileged Access Management (PAM) Solution	PAM offers a secure connectivity route to customers, by providing greater control of access to passwords for customer environments	Azure UK South – Primary Tenant.	Azure UK West (Availability zone).	UK	SaaS	User names, Passwords, Server / host name, Customer Names, IP addresses, Active Directory configuration details (Domain name, service account)
<b>Ultima Support Services provision (including Managed Services, Support Services, CSP Support for Direct Customers):</b>							
ServiceNow	CSM & ITOM Platform	Managed Service/Support ticketing, reporting, automation	Newport, London	Newport, London	UK	SaaS	Username, Phone Numbers, Email, Ticket Information, IP's, Hostnames, Platform info.
BrightPattern	Contact Centre/Telephony Services	SaaS based contact centre and telephony platform for Managed Services	Ireland (EEA)	UK	EEA	SaaS	Full names, Phone Numbers, Email, general contact information.

## Ultima Business Solutions Limited Data Protection Processing

### Managed Service - Transmitting Data Only:

Ivanti	Patching Services	Used to provide patching services to Ultima and all Managed Service Customers	AWS Cloud USA	North Virginia, USA	USA	SaaS	Client Hostname, IP, Patch Status & Compliance. Note: ONLY for Cloud Customers. Typically only Agent ID Metadata, Agent Policies, Proxy Credentials.
Logicmonitor	Monitoring Platform	Monitoring platform for all Ultima & Customer Platforms	Geo Located across Amsterdam/Dublin		EEA	SaaS	Hostnames, IP's, App Details/Status, Basic log information.
Tenable IO	VMDR (Cloud)	Vulnerability Scanning of internal/external networks either via a VM based scanning device or an agent installed onto the system All data is then securely sent to the Tenable Cloud platform which is a UK based instance	UK (London)	Germany (Frankfurt)	UK/EEA	SaaS	The Scanners will process and store data – Network Scanner – Capturing IP, Hosts, OS Details, Application Details (where it can), any discovered vulnerabilities Agents – Capture IP, Host Details, OS, Applications, Last logged on user ID/Name, any discovered vulnerabilities and metrics on patching. Both of these scanners will securely transmit to the Tenable SaaS platform and store it on there for the purpose of reporting, or resolving/mitigating any threats/vulnerabilities
Vicarius	Patching Services	Used to provide patching services to Ultima and all Managed Service Customers	AWS Cloud, Germany	Germany	EEA	SaaS	Endpoint information and similar metadata.

### CSP Support - Direct and Indirect Customers

Vantage Inc.	Vantage	The Vantage tool is a FinOps product, for cloud cost management and optimisations. This is rolled out to CSP and Managed Cloud customers only to enable finer granularity in cost reporting for customers' internal usage.	US East 1 - AWS Cloud	USA Region (failover)	USA	AWS Cloud	SKU's resource names (in Azure/AWS portal/console), Log on name / Vantage user account name (Full names PII), Resource groups, Tags, Host Names and IP Addresses - Vantage Log In Locations.
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### CSP Support - Direct Customers

IOTAP Inc	Work365 (CSP support)	platform that enables customer self-service for CSP products and services. This platform integrates into Ultima's D365 CRM. Work 365 for Microsoft Dynamics CRM is licensed on a subscription basis and delivered as a Software-as-a-Service (SaaS) solution embedded into Microsoft Dynamics 365.	Geo Located UK/ EU	UK / EEA	EEA	Cloud	Customer subscription count, BCI, customer names, business addresses, website
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# Ultima Business Solutions Limited

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### CSP Support - Indirect Customers

TD Synnex UK Ltd	Cloud Support Services	provides full technical support 24/7 for the Microsoft Cloud Products entitled to Cloud Support Services for Partners and all its End Customers, under partner's branding	StreamOne (SCM): Europe / ION (previously SES): US	StreamOne (SCM): Europe / ION (previously SES): US	EEA / US	Cloud	In connection with 1st and 2nd level support services for MS cloud solutions, TD SYNnex may have technical possibility to access content data but there is no transfer of data involved. Categories of data are End User; End-User employee or End User - solution user
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Quattro Business Support Services (Quattro Inc)	Cloud Support Services	provides full technical support 24/7 for the Microsoft Cloud Products on behalf of Tech Data	StreamOne (SCM): Europe / ION (previously SES): US	StreamOne (SCM): Europe / ION (previously SES): US	EEA / US	Cloud	In connection with 1st and 2nd level support services for MS cloud solutions, TD SYNnex may have technical possibility to access content data but there is no transfer of data involved. Categories of data are End User; End-User employee or End User - solution user
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### The AntiSocial Engineer

Kinsta	Knowledge - Training Platform	A Learning Management System (LMS), built using WordPress, hosted by Kinsta. This delivers training to 3rd party customer organisations, as well as internal training.	Google Cloud UK	UK	UK	SaaS	Full names, email address (BCI and/or personal email), performance scores course completion / progress. No Sensitive PII
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Kinsta	Anti-phish - Social Engineering Platform	The AntiPhish service is a consultant-led service which imitates real phishing attacks in a safe and controlled fashion to increase security awareness	Google Cloud UK	UK	UK	SaaS	Full names, email address (BCI and/or personal email). No sensitive PII.
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Ultima Business Solutions Limited  
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**Annex 2 - Ultima Companies List**

<b>Ultima Business Solutions South Africa Proprietary Limited</b>	<b>Just After Midnight Limited</b>	<b>Just After Midnight PTE Limited</b>	<b>Just After Midnight Proprietary Limited</b>	<b>Just After Midnight Inc.</b>
Incorporated and registered in South Africa with company registration number 2023/853808/07  Registered address: c/o Bass Gordon, Suite 1502, 15th Floor, Portside, 4 Bree Street, Cape Town 8001, South Africa	An English limited liability company incorporated in England and Wales with company number 10307714  Registered address: Gainsborough House, Manor Park, Reading RG2 0NA, UK	Incorporated and registered in Singapore with company number 201627568M  Registered office: 39 Pagoda Street, #03-01, Singapore 059198	Incorporated and registered in New South Wales, Australia with company number 33628706178  Registered office: 120-40 Meagher St, Chippendale, NSW, Australia 2008	Incorporated and registered in the State of Delaware, United States of America with file number 5974998  Registered office: 111 Congress Avenue, Suite 500, Austin, Texas, 78701, USA;
Ultima and the Ultima Companies have team members distributed globally.  Please see our data policies and safeguards section below for more information relating to access of data.				
<p><b>For all Customers:</b></p> <p>Each applicable Ultima Company has access to the Ultima Business Solutions Limited (“Ultima”) environment (hosted in the UK/EEA) which includes but is not limited to, the Finance and CRM platforms and SharePoint environment. Each Ultima Company may provide resources, including administrative and operational support, to Ultima and the other Ultima Companies. Staff of the applicable Ultima Company may provide professional services, including consultancy and project management services to Ultima’s Customers.</p>				
<p><b>For CSP Support, Ultima Support Services and Managed Services only:</b></p> <p>unless agreed otherwise, Ultima Company employees shall have access to the following in order to provide Services:</p> <ul style="list-style-type: none"> <li>- ITSM ticket data pertaining to alerting / issues to the infrastructure, including: full names / emails addresses of customer staff, Line Manager full names / job titles, working locations, telephone number, IP Addresses and server names/ locations.</li> <li>- Call recordings / logs</li> <li>- Access to Customer Environment/s as contracted.</li> </ul>				
<p><b>Data policies and safeguards:</b></p> <p>All data hosting for core systems (as outlined in Annex 1) shall be in the UK/EEA. Access to such data by the applicable Ultima or Ultima Company employees (including the remote team members), shall be granted, within the confines of Ultima’s Information Security Management System (ISMS) rules (Including PIM, MFA, full encryption and Single Sign on).</p>				

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Data shall not be physically transferred to the applicable Ultima Company (including the remote team members), but access to such data by the applicable Ultima or Ultima Company employees (including the remote team members) shall be granted, within the confines of Ultima's ISMS rules as outlined on our [website](#).

Ultima has appropriate safeguards including, but not limited to, an intra-group data sharing agreement, as required by Applicable Data Protection Laws<sup>1</sup>, for the 'processing' of personal data by the applicable Ultima Company.

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<sup>1</sup> Applicable Data Protection Laws means:

- a) To the extent the UK Data Protection Legislation applies, the laws of the United Kingdom or of a part of the United Kingdom which relates to the protection of personal data.
- b) To the extent the EU GDPR applies, the law of the European Union or any member state of the European Union to which Ultima is subject, which relates to the protection of personal data.

UK Data Protection Legislation means: all applicable data protection and privacy legislation in force from time to time in the UK including: the UK GDPR; the Data Protection Act 2018; the Privacy and Electronic Communications Directive 2002/58/EC (as updated by Directive 2009/136/EC) and the Privacy and Electronic Communications Regulations 2003 (SI 2003/2426) as amended.

EU GDPR means: the General Data Protection Regulation ((EU) 2016/679)

UK GDPR: has the meaning given to it in section 3(10) (as supplemented by section 205(4)) of the DPA 2018.