

Data protection is a particularly high priority for the management of SAS International®. The use of SAS International's internet pages is possible without any indication of personal data. However, if you want to use special company services via our website, processing of personal data may become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from you.

The processing of personal data, such as your name, address, e-mail address, IP address or telephone number shall always be carried out in accordance with the General Data Protection Regulation (GDPR) and with the country-specific data protection regulations applicable to SAS International. By means of this data protection declaration, our company would like to inform the general public of the nature, scope and purpose of the personal data we collect, use and process. Furthermore, you are informed by this declaration of the rights to which you are entitled.

SAS International has implemented numerous technical and organisational measures to ensure the most complete protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, you have the option of providing personal data to us via alternative means, e.g. by telephone.

1.0 Name and Address of SAS International

The Data Controller for the purposes of the General Data Protection Regulation (GDPR) or other country-specific data protection laws and other provisions related to data protection is:

Address: SAS International, 31, Suttons Business Park, Earley, Reading. RG6 1AZ, United Kingdom
Phone: +44 (0)118 290 900
Website: sasintgroup.com

2.0 Name and Address of the Data Protection Officer

SAS International's Data Protection Officer is:

Glenn Cook
Email: gcook@sasint.co.uk
Website: <https://sasintgroup.com>

You may contact our Data Protection Officer directly with any questions and suggestions concerning data protection.

3.0 Cookies

The internet pages of SAS International use cookies, which are text files that are stored in a computer system via an Internet browser. Through the use of cookies, SAS International can provide the users of this website with more user-friendly services that would not be possible without the cookie setting. The cookies on the SAS International website record information about what device you are using, which pages on our site you are visiting and check if this is a repeat visit to allow us to tailor our website to your interests.

You may prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, those cookies already established may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If you deactivate the setting of cookies in the Internet browser used, not all the website functions may be entirely usable.

Do Not Track (DNT) is a feature offered by some browsers which, when enabled, sends a signal to websites to request that your browsing is not tracked, such as by third party ad networks, social networks and analytic companies. The SAS International website does not currently respond to DNT requests.

4.0 Collection of General Data and Information

The website of SAS International collects a series of general data and information when you access it. This general data and information are stored in the server log files and may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, SAS International does not draw any conclusions about you. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimise the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, SAS International analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our company, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by you.

5.0 Registration on Our Website

You can register on our website, where the personal data transmitted to us is determined by the respective choices used for the registration. The personal data entered by you is collected and stored exclusively for internal use by us. Registration may be required for a variety of reasons, for example, to register for news updates based on interest, events or to participate in surveys.

SAS International shall provide information on request to you as to what personal data is stored about you. In addition, SAS International shall correct or erase personal data at the request of you, insofar as there are no statutory storage obligations.

6.0 Subscription to Our Updates and News

On the SAS International website, you are given the opportunity to subscribe to our company updates via email. The input used for this purpose determines what personal data is transmitted, as well as when the updates are ordered from SAS International.

SAS International informs its customers and business partners regularly by means of emails on company offers or technical updates. The company's emails may only be received by you if (1) you have a valid e-mail address and (2) have registered for the newsletter.

The personal data collected as part of a registration for this correspondence will only be used to send our relevant updates. The subscription to these may be terminated by you at any time. You can do this by clicking on the corresponding link which can be found in each email. It is also possible to unsubscribe from the email updates at any time directly on the SAS International website.

7.0 Contact Possibility Via the Website

The website of SAS International contains information that enables quick electronic contact to our company, as well as direct communication with us, which also includes a general e-mail address. If you contact SAS International by e-mail or via a contact form, the personal data transmitted by you is automatically stored. Such personal data transmitted on a voluntary basis by you to SAS International is stored for the purpose of processing or contacting you. There is no transfer of this personal data to third parties.

8.0 Routine Erasure and Blocking of Personal Data

SAS International shall store and process your personal data only for the period necessary to achieve the purpose of storage, or as far as this is granted by any laws or regulations to which SAS International is subject to.

9.0 Data Protection for Applications and the Application Procedures

SAS International shall collect and process the personal data of online job applicants for the purpose of the processing of the application procedure. The processing may also be carried out electronically. In particular, this is the case if an applicant submits corresponding application documents by e-mail or by means of a web form on the SAS International website. If SAS International concludes an employment contract with an applicant, the submitted data will be stored for the purpose of processing the employment relationship in compliance with legal requirements. If no employment contract is concluded with the applicant by SAS International, the application documents shall be automatically erased two months after notification of the refusal decision, provided that no other legitimate interests of SAS International are opposed to the erasure.

10.0 Legal Basis for the Processing

GDPR or country-specific data protection regulations applicable to SAS International set out the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which you are party, e.g. when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1)(b) of the GDPR. The same applies to such processing operations which are necessary for carrying out pre-contractual measures, e.g. making enquiries about our products or services. If our company is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Article 6(1)(c) of the GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of you or of another person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data or other vital information would have to be passed on to a doctor, hospital or other third party. In this instance, the processing would be based on Article 6(1)(d) of the GDPR. Finally, processing operations could be based on Article 6(1) of the GDPR. This legal basis is used for processing operations which are not covered by any of the above mentioned legal grounds, if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require the protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned and in accordance with the country-specific data protection regulations applicable to SAS International. It is considered that a legitimate interest could be assumed if you are a client of SAS International.

11.0 The Legitimate Interests Pursued by SAS International or by a Third Party

Where the processing of personal data is based on Article 6(1) of the GDPR, our legitimate interest is to carry out our business in favour of the well-being of all our employees and shareholders.

12.0 Period for Which Personal Data Will be Stored

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract.

13.0 Provision of Personal Data as Statutory or Contractual Requirement; Requirement Necessary to Enter into a Contract; Obligation of You to Provide the Personal Data; Possible Consequences of Failure to Provide Such Data

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes, it may be necessary to conclude a contract that requires you to provide us with personal data, which must, subsequently, be processed by us. You are, for example, obliged to provide us with personal data when our company signs a contract with you. The non-provision of the personal data would have the consequence that the contract with you could not be concluded. Before personal data is provided by you, you can contact our Data Protection Officer. Our Data Protection Officer is able to clarify whether the provision of the personal data is required by law, or contract, or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of not providing personal data.

PRIVACY POLICY



14.0 Existence of Automated Decision-Making

As a responsible company, we do not use automatic decision-making or profiling.

15.0 Related Documentation

Data Protection Policy

SAS Privacy Policy

Privacy Notices

16.0 References

The EU General Data Protection Regulation 2016/679

Data Protection Bill 2017

UK Information Commissioners Office

17.0 Change History

Issue 1 - 05 March 2018 - Initial draft

A handwritten signature in black ink, appearing to read 'Todd Altman', with a stylized flourish at the end.

Todd Altman

Chief Executive | SAS International

Date: 02/05/2018