

## SCHEDULE E: ANALYTICS, REPORTING, ARCHIVE AND METADATA ACCESS CONTROL SCHEDULE

VERSION 1.1 - EFFECTIVE FROM [.]

### Introduction

This **Analytics, Reporting, Archive and Metadata Access Control Schedule** is a schedule to our agreement with you.

It sets out:

- the **switching metadata** we will collect, process and analyse from your use of the **hub**;
- what, how and to whom we will report; and
- the controls we have in place to restrict access to **switching metadata** and the reports we derive from its analysis.

This schedule does not deal with our handling of **personal data**. Information on how we:

- process **personal data** on your behalf as a **data processor** can be found in the **Data Protection Schedule**; and
- process **your business contact** personal data as a **data controller** can be found in our **Privacy Policy**.

### What switching metadata will we collect, process and analyse?

*What do we collect? Audit Trail of actions in **hub***

Every action in the **hub** is logged as part of our **hub's** audit trail. The audit trail data will be kept for all actions performed by the **hub** post office or one of the associated portals, such as the administration portal. All actions will be sequenced, timestamped, and stored securely to prevent tampering or unauthorised access. All logging will be stored in a centralised location and capable of free text searching.

*What do we store? **Hub** Archive*

After a **switching message** has been sent through the **hub** and delivery to the recipient has been confirmed, the different elements of the **switching message** (other than the **switching message** content which will be deleted) will be stored in our **hub** archive in accordance with the deletion/archiving policy set out below:

- **switching metadata** (GRCP/LRCP IP, message type, etc)
  - deletion 24 months after generation
- invoices and billing information
  - deletion after 7 years (tax and legal requirement to retain)

We do not store, archive or otherwise retain any **switching message** content.

*What do we analyse? Use of **switching metadata** for our analysis and reporting*

We will not access or process the **personal data** in the **switching message** content for any analysis or reporting.

The data in the **switching message** envelope contains no personal data and this will be used as **switching metadata** for our analysis and reporting.

### **What, how and to whom will we report?**

**You** will be able to access your own **switching metadata** and run **your** own reports using our self-service portal.

**We** will provide reports to Ofcom in accordance with our legal obligations.

**We** will generate and use reports of the following purposes:

- Customer service
- Generating invoices
- Understanding hub usage patterns, performance and security
- Analysing the health of the switching process
- Reporting to industry of anonymised statistics

### **What access controls do we have to protect access to switching metadata and derived reports?**

**We** will keep **switching metadata** and derived analysis and reports confidential and secure as set out in our **Security Policy**.

To protect the commercial sensitivity of this information, **we** have put in place the following access controls for **switching metadata** and derived analysis and reports:

- Access is barred to all TOTSCo constituency directors and their alternates.
- Access is restricted to those TOTSCo employees and contractors that need to know this information.