



A Note On 'You'

'You' and 'your' mean the Customer.

Data Processing Annex

1 Subject Matter Of The Processing Of Personal Data

This Data Processing Annex sets out the details regarding how Customer Personal Data is Processed when providing the BT Managed Cloud Security (Zscaler) Service that is provided as part of the Managed Cisco SD-WAN Service.

2 Duration Of The Processing Of Personal Data

BT or its Sub-Processor will Process the Customer Personal Data for the BT Managed Cloud Security (Zscaler) Service as set out in this Annex for as long as BT provides the BT Managed Cloud Security (Zscaler) Service with the Managed Cisco SD-WAN Service and for as long as BT may be required to Process the Customer Personal Data in accordance with Applicable Law.

3 The Nature And Purpose Of The Processing Of Personal Data

- 3.1 The Service allows you to set rules by which URLs are blocked and web content is filtered on your IT systems. The software itself is provided by a third party and hosted on that third party's public cloud infrastructure, with no access to underlying information possible for BT.
- 3.2 If you request a 'management overlay', BT will have access through the online portal to a log of your IP addresses and MAC addresses, together with attempted URL or website visits by those addresses, in order to provide reports to you. BT has no access to data other than within this portal.
- 3.3 If BT is purely reselling the Service to you, then BT is neither a Controller nor a Processor of Personal Data.

4 Types Of Personal Data and Categories of Data Subjects

- 4.1 The types of Customer Personal Data Processed by BT or its Sub-Processors or you will be:

- 4.1.1 website or IP address;
- 4.1.2 name;
- 4.1.3 address;
- 4.1.4 telephone number;
- 4.1.5 email address;
- 4.1.6 job title;
- 4.1.7 company name;
- 4.1.8 contact records;
- 4.1.9 usage records (call, internet or router logs); and
- 4.1.10 identity management - user profiles.

- 4.2 The Customer Personal Data will concern the following categories of Data Subjects:

- 4.2.1 your employees;
- 4.2.2 your customers or third parties; and
- 4.2.3 any Data Subject (as controlled by you).