



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 Managed Embedded Security Controls Service.

2 Duration Of The Processing Of Personal Data

BT or its Sub-Processor will Process the Customer Personal Data for the Managed Embedded Security Controls Service as set out in this Annex for as long as BT provides the Managed Embedded Security Controls 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 nature and purpose of the Processing of Customer Personal Data by BT includes:

- 3.1.1 providing a service that allows you to configure your Managed Embedded Security Controls Service implementing rules by which source and destination IP Addresses, protocols, Users and applications can be controlled via the CSP;
- 3.1.2 monitoring traffic traversing the Managed Embedded Security Controls Service to enforce the rules and CSPs implemented on the Security Appliance;
- 3.1.3 sharing Customer Personal Data with the suppliers of BT Equipment or sub-contractors as may be necessary for the provision and management of the Managed Embedded Security Controls Service including installation, maintenance and resolution of Incidents;
- 3.1.4 if you have selected the Threat Emulation Service, Customer Personal Data being sent automatically from Security Appliances or Software to cloud-based infrastructure operated by the supplier for threat emulation and assessment; and
- 3.1.5 accessing a log of customer IP Addresses, MAC addresses and Users, together with attempted URL and website visits by those addresses and Users, using an online Security Portal in order to provide you with reports.

3.2 If you have selected the SSL/TLS Inspection Service Option, any Customer Personal Data that is present in the SSL Encrypted Traffic at the time of de-encryption will be Processed for threat detection only before being re-encrypted. BT cannot know in advance the types of Customer Personal Data that could be present in the SSL Encrypted Traffic and they are, therefore, not listed in Paragraph 4 below.

3.3 Customer Personal Data may be Processed in a country other than where the User is located and this country may be changed by BT.

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 of destination;
- 4.1.2 IP Address of source device;
- 4.1.3 MAC address of source device;
- 4.1.4 business contact details including:
 - 4.1.4.1 name;
 - 4.1.4.2 address;
 - 4.1.4.3 telephone number;
 - 4.1.4.4 email address;
 - 4.1.4.5 job title;
 - 4.1.4.6 company name;
- 4.1.5 contact records;
- 4.1.6 usage records (internet or router logs);
- 4.1.7 User ID and log-in details; and
- 4.1.8 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).