



A Note On 'You'

'You' and 'your' mean the Customer.

Data Processing Annex

1 Subject Matter of the Processing

This Data Processing Annex sets out the details regarding how Customer Personal Data is Processed when providing the BT Managed Cloud Security (Zscaler) Service.

2 Duration of the Processing

While BT is not directly processing Customer Personal Data for providing the managed Service, the Customer Personal Data for the Service will be processed by the Supplier for as long as the Service is provided and for as long as it is required, in accordance with Applicable Laws.

3 The Nature and Purpose of the Processing

- 3.1 With this Service BT will only act as Controller in accordance with the terms set out in the Governing Agreement and in relation to the data that is necessary for contract administration purposes.
- 3.2 If BT is purely reselling the Service to you. You as a Data Controller of Customer Personal Data acknowledges and accepts Supplier's privacy policy as set out on <https://www.zscaler.com/privacy-policy.php>. and as may be amended or supplemented from time to time by the Supplier. The Supplier uses the following Sub-processors: <https://www.zscaler.com/legal/subprocessors>.
- 3.3 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.
- 3.4 The Service allows you to set rules for public and private hosted applications.
- 3.5 The Service allows you to set rules by which User experience insights can be shared.
- 3.6 Where Zscaler Digital Experience is provided, device information, location information, device inventory, username along with call quality metrics are available to You subject to licence subscription. Data types can be obfuscated if required but are available under the performance of User experience.
- 3.7 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 these portal(s).

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 transaction logs, identity management – user profiles.

This list is not exhaustive as you will specify what Personal Data is Processed.
- 4.2 The Customer Personal Data will concern the following categories of Data Subjects:
 - 4.2.1 your employees, directors and contractors and you other third parties;
 - 4.2.2 your customers or third parties;
 - 4.2.3 your customer's end users; and
 - 4.2.4 any Data Subject (as controlled by you).

This list is not exhaustive as you will specify what Personal Data is Processed.