

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 (Cisco Cloud Umbrella) Service.

2 Duration Of The Processing Of Personal Data

BT or its Sub-Processor will Process the Customer Personal Data for the Managed Cloud Security (Cisco Cloud Umbrella) Service as set out in this Annex for as long as BT provides the Managed Cloud Security (Cisco Cloud Umbrella) 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 Account/Contract Information:

- (a) Administrator email address;
- (b) Administrator first and last name;
- (c) password;
- (d) billing contact name;
- (e) validation details;

4.1.2 Usage and Event Data:

- (a) Domain;
- (b) DNS record type;
- (c) IP address;
- (d) User email ID;
- (e) HTTP traffic and HTTP header info;

4.1.3 Configuration Information:

- (a) User name;
- (b) device ID;
- (c) Administrator name;
- (d) IP address;
- (e) MAC address;
- (f) unique account settings;

4.1.4 Dashboard Activity Information:

- (a) IP address,
- (b) User ID,
- (c) geolocation data of your Administrator(s);

4.1.5 Support Information:

- (a) Name;
- (b) Email address;
- (c) phone number of the employee appointed to open the service request,

(d) your information.

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).