

# Product Transparency Notice

For any queries, please contact [privacyteam@symantec.com](mailto:privacyteam@symantec.com)

## Advanced Threat Protection (ATP)

This Privacy Transparency Notice describes how Advanced Threat Protection (ATP) (“Product”) collects and processes Personal Data. Its purpose is to provide You (our current or prospective “Customer”) the information You need to assess the Personal Data processing that is involved in using the Product.

### 1. Product Description

Advanced Threat Protection is an on-premise appliance that monitors the activity of an entire organization, collecting forensics data and detecting activity that may constitute a cybersecurity threat.

Further information about the Product is available at:

<https://www.symantec.com/products/threat-protection>

### 2. Personal Data Collection And Processing

#### Sources of Data

The product collects and holds in the Customer’s environment information about a variety of activities within the customer’s organization, from routers, firewalls and software running on endpoints within the organization. Some of this information can be correlated to individuals by the use of IP address, and occasionally company usernames. This information may also be correlated with web browsing activity and with applications downloaded and run.

Optionally the Customer can opt for the product to send telemetry data back to Symantec for the purpose of improving the detection of, and protection against cybersecurity threats. Such telemetry data is anonymous and does not contain Personal Data such as usernames, IP addresses, emails, machine identifiers or any data that is relatable or attributable to an individual.

#### Respective Roles of Symantec and Customer

With respect to Personal Data collected by the Product during its use, the Customer is the Controller. The use of the Product does not involve Symantec as a Data Processor.

#### Personal Data Elements Collected and Processed, Data Subjects, Purpose of Processing

| Personal Data Category  | Data Subject Category              | Purpose of Processing   |
|---|------------------------------------|---|
| Individual identifiers (usernames) and contact information (e.g. email addresses)   | Customer employees and contractors | To collect usernames associated with the monitoring of corporate managed devices, for forensic analysis of possible security incidents          |
| Network activity data (browsing activity, session logs, traffic data and related telemetry), to the exclusion of any content data | Customer employees and contractors | To record the logs of security scans triggered by the network activity of the customer’s corporate managed devices and networks that are routed |

|   |                                    |  |
|---|------------------------------------|--|
|   |                                    | through the product; to perform the security analysis of information regarding the sources and destinations of network traffic and files being transferred |
| Applications downloaded and launched on company equipment | Customer employees and contractors | To perform the security analysis of actions performed by applications downloaded and run on the customer's corporate managed devices                       |

The Product does not need and is not meant to collect or process any Special Categories of Personal Data.

**Personal Data Retention Schedule**

As the Controller, the Customer is solely responsible for defining and implementing the retention policies and periods applicable to Personal Data collected through the use of the Product. The use of the Product does not involve Symantec as a Data Processor.

**3. Disclosure and International Transfer of Personal Data**

**Third-Party Sub-Processors**

Symantec involves no third-party sub-processor in delivering the Product to the Customer.

**International Transfers of Personal Data**

As the Controller, the Customer is solely responsible for complying with any rules applicable to the international transfers of Personal Data that the Customer collects by using the Product. The use of the Product does not involve Symantec as a Data Processor.

**4. Exercise Of Data Subject Rights**

As the Controller, the Customer is solely responsible for complying with any rules applicable to the exercise of Data Subject Rights related to Personal Data that the Customer collects by using the Product. The use of the Product does not involve Symantec as a Data Processor.

**5. Information Security**

**Technical and Organizational Measures**

As the Controller, the Customer is solely responsible for complying with any rules applicable to the security of the processing of Personal Data that the Customer collects by using the Product. The use of the Product does not involve Symantec as a Data Processor.

Security documentation about the Product itself is available on the [Symantec Customer Trust Portal](#).

This notice is the sole authoritative statement relating to the Personal Data processing activities associated with the use of this Product. It supersedes any prior Symantec communication or documentation relating thereto.