

Product Transparency Notice

For any queries, please contact privacyteam@symantec.com

Cloud Data Protection (CDP)

This Privacy Transparency Notice describes how Cloud Data Protection (CDP) (“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

Cloud Data Protection is a server solution deployed onsite within a customer's network, designed to identify sensitive data (as defined by a customer policy) transacted by the customer when using a SaaS application, and replace such data with encrypted or tokenized values as a real-time, inline capability.

Further information about the Product is available at:

<https://www.symantec.com/products/cloud-data-protection-security>

2. Personal Data Collection And Processing

Sources of Data

CDP does not collect data from CDP customers. Symantec customers may - through the course of a troubleshooting engagement with Symantec Customer Support - transmit application logs manually for the purpose of issue resolution. This is beyond the scope of product operation.

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, except as may regard application logs transmitted manually by the customer to Symantec Customer Support for troubleshooting purposes. With respect to any Personal Data transmitted from the customer to Symantec for this purpose, the customer is the controller, and your Symantec contracting entity as specified in Your applicable Agreement (“Symantec”) acts as a processor. The rights and obligations of both parties with respect to Personal Data processing are defined in the applicable Data Processing Addendum available on the [Symantec Privacy - GDPR Portal](#).

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

Personal Data Category	Data Subject Category	Purpose Of Processing
Individual identifiers (names, usernames) and network activity data (session logs, traffic data)	Customer employees and contractors	Product operation logging
Any Personal Data which the customer decides to tokenize using the Product	Any individual whose Personal Data the customers decides to tokenize using the Product	Tokenization

The Product does not need and is not meant to collect or process any Special Categories of Personal Data for its operation. It is however suitable for the enhanced protection of such data by applying customer-defined tokenization policies to such data.

Personal Data Retention Schedule

The customer has full control over the product's logging rollover configuration and can define size of log file(s) and number of archived versions to retain. As regards any Personal Data transmitted by the Customer to Symantec, for the duration of the contractual relationship with the Customer, Personal Data is retained as described in the applicable product description. After the expiry or termination of the contractual relationship, Personal Data is decommissioned except where its retention is required by applicable law, in which case Personal Data covered by such requirement will be further retained for the legally prescribed period.

3. Disclosure and International Transfer of Personal Data

Recipients of Personal Data

Symantec will send Personal Data to internal recipients (affiliated Symantec entities) and, if applicable, external recipients (third party sub-processors), in the facilitation or provision of the Product. The list of Symantec affiliated entities and their geographical locations are available on the [Symantec Privacy - GDPR Portal](#).

Third-Party Sub-Processors

No third-party sub-processor is involved in delivering the Product.

International Transfers of Personal Data

As regards any Personal Data transmitted by the Customer to Symantec, You are advised that Symantec and its affiliated entities will transfer Personal Data to locations outside of the European Economic Area, including potentially to external recipients, on the basis of European Commission Decision C(2010)593 on Standard Contractual Clauses (processors), or of any alternate, legally permitted means.

4. Exercise Of Data Subject Rights

The customer can delete system logs at any time. Further, pursuant to the applicable Data Processing Addendum, and to the extent possible taking into account the nature of the processing, Symantec will assist the Customer, insofar as this is feasible, with the fulfillment of the Customer's obligation to respond to requests for exercising Data Subjects' rights such as the rights of access, rectification, deletion and objection laid down in Chapter III of the EU General Data Protection Regulation (GDPR).

5. Information Security

Technical and Organizational Measures

It is Symantec's and all of its affiliated entities' commitment to implement, and contractually require all sub-processors to implement, appropriate technical and organizational measures to ensure an appropriate level of security, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk for the rights and freedoms of Data Subjects. Additional security documentation 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.