Cloud Workload Protection for Storage (CWP for Storage)

This Privacy Transparency Notice describes how Cloud Workload Protection for Storage – AWS Agent and/or Microsoft Azure Blob Storage Agent (“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

Symantec Cloud Workload Protection for Storage (CWP for Storage) service helps in protecting the data that is stored in AWS S3 Buckets and/or Azure Blob Storage from malware infections. The product scans the S3 Buckets and/or Storage Account Blobs for security threats (like malware) with the help of Symantec’s security technologies.

**AWS S3 Agent:** The service enables customers to deploy an Agent in a desired AWS region of the customer’s account. Based on the configuration, the Agent will provide necessary protection to the data in AWS S3 buckets of the region in which the Agent is deployed. Agent instances of one or more AWS regions across multiple AWS accounts of the customer can be centrally managed through the cloud based Centralized Management Console.

Additionally, CWP for Storage enables information protection with the help of sensitive Data Identification by leveraging Symantec’s proprietary Data Leakage Prevention* (DLP) technology. DLP detectors can be deployed in pair with CWP Storage Agents, and CWP for Storage can be configured to use those DLP Detectors to scan files for detecting sensitive information in the customer’s AWS storage, based on customer-defined DLP policies. By applying AWS Tags to files that violate such policies, CWP for Storage can thus provide visibility into violations of the customer’s information protection policy.

**Azure Blob Agent:** The service enables customers to deploy an Agent in a desired Customer’s Azure subscription. Based on the configuration, the Agent will provide necessary protection to the data in the Azure Blob Storage Account within the Customer’s subscription ID. Agent instances within the Customer’s Azure subscription can be centrally managed through the cloud based Centralized Management Console.

The Cloud based Console of Symantec is shared with Symantec’s other services like Cloud Workload Protection* (CWP) and Symantec Protection Engine* (SPE).

Further information about the Product is available at:
https://www.symantec.com/products/cloud-workload-protection

2. Personal Data Collection And Processing

Sources of Data

The CWP for Storage Console accepts personal information at the time of product enrollment from common cloud or AWS marketplace, specifically work email address, LiveUpdate Administrator* IP Address, AWS VPC & Subnets or Azure VNet & Subnets for the purpose of configuring the Agent in the customer’s AWS account and/or Azure subscription and enabling the service.
To deliver the security service, the AWS Agent collects user IDs and machine IP addresses to identify the source of detected malware or infection. The violation information along with these details is sent from Agent to Cloud Console.

CWP for Storage Agent integrates internally with various security/anti-malware technologies from Symantec Security Technology & Response* (STAR) team.

Respective Roles of Symantec and Customer

With respect to Personal Data transmitted from the Customer to Symantec for the purposes of the Product, 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

<table>
<thead>
<tr>
<th>Personal Data Category</th>
<th>Data Subject Category</th>
<th>Purpose Of Processing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact information (email address)</td>
<td>Customer employees and contractors</td>
<td>Service configuration, user notifications about the deployment of the Agent</td>
</tr>
<tr>
<td>Online identifiers and trackers (AWS VPC &amp; Subnets, Azure VNet &amp; Subnets, user ID, IP address, cookies)</td>
<td>Customer employees and contractors, other persons interacting with customer</td>
<td>Security service configuration and enablement, detection of the origin of infected files</td>
</tr>
<tr>
<td>Any personal data that may be contained in the files scanned by DLP detectors</td>
<td>Any data subject whose data may be contained in the customer’s files</td>
<td>Detection of violations of customer-defined information protection policies</td>
</tr>
</tbody>
</table>

### Personal Data Retention Schedule

Email addresses used to configure AWS or Azure services in the customer's account are retained within that account until the customer deletes the AWS (S3) Agent, AWS account, Azure Storage Blob or Azure account. LiveUpdate Administrator* IP Address is retained with the AWS (S3) Agent or Azure Blob Agent until the customer changes or removes it. It is also removed after the customer deletes their AWS (S3) Agent or Azure Blob Agent from their AWS or Azure account. AWS VPC & Subnet and/or Azure VNet & Subnet data will stay in the configuration of various services in the customer's AWS and/or Azure account until the customer removes the configuration or deletes the account.

Personal Data collected to identify users registered with the product is erased 30 days after the subscription expires or cancelled. Events data is erased after 90 days. For the duration of the contractual relationship with the Customer, any other 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 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

The third-party sub-processors involved in delivering the Product are:

<table>
<thead>
<tr>
<th>Sub-Processor</th>
<th>Personal Data</th>
<th>Purpose of processing</th>
<th>Locations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amazon Web Services (AWS)</td>
<td>Individual identifiers, contact information, online identifiers and trackers</td>
<td>Services are deployed on AWS Infrastructure. CWP can be configured to export the events to AWS CloudWatch in customer account.</td>
<td>U.S.A.</td>
</tr>
<tr>
<td>Microsoft Azure</td>
<td>Individual identifiers, contact information, online identifiers and trackers</td>
<td>Services are deployed on Azure Infrastructure.</td>
<td>U.S.A.</td>
</tr>
</tbody>
</table>

This list is subject to change. Any planned change will be announced in advance on the Symantec Privacy - GDPR Portal. Customers can exercise their rights with respect to such changes according to the provisions of the applicable Data Processing Addendum.

International Transfers of Personal Data

You are advised that Symantec and its affiliated entities will transfer Personal Data to locations outside of the European Economic Area, including 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 request to amend/rectify or delete the data collected by CWP for Storage. 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

Symantec authorized personnel have exclusive access to the secure data store. All the data is transferred on secure https/SSL channel and stored in secured data store. The Customer sensitive data is stored in encrypted form. 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.
For further information on the Personal Data processing involved in the use of other Symantec products referenced in this Notice, please refer to those products’ Transparency Notices on the Symantec Privacy - GDPR Portal.