Symantec Critical System Protection

This Privacy Transparency Notice describes how Symantec Critical System Protection ("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 Critical System Protection is a security engine designed to protect IoT devices against cyberthreats. Based on the function-specificity and predictable performance and actions of IoT devices, Symantec Critical System Protection can enforce Customer-defined policies to govern the operation of the system, allowing only non-malicious device actions and behaviors. Symantec Critical System Protection includes among other features a host firewall, device and configuration control, file integrity monitoring, intrusion detection, operating system hardening, application whitelisting and automatic application sandboxing.

Further information about the Product is available at:

https://www.symantec.com/products/embedded-security

2. Personal Data Collection And Processing

Sources of Data

The Product is not designed or meant to collect or process any personal data. Its purpose is to secure Internet of Things devices typically in industrial environments. Nevertheless, as the Product involves monitoring connected devices’ network connections to block harmful inbound traffic and unauthorized outbound traffic, the Product will process devices’ network identifiers (e.g. IP address) within the Customer’s environment.

Respective Roles of Symantec and Customer

The Product is deployed on-premise in the Customer’s environment and does not transmit any Personal Data to Symantec or to any third party. The Customer is the sole Controller of any Personal Data that may be collected and processed by the Product.

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>
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<tbody>
<tr>
<td>Network identifiers of devices in the Customer’s IoT environment</td>
<td>Customer end-users who may be controlling, operating, monitoring, supervising or otherwise interacting with protected devices in the Customer’s environment</td>
<td>Protection of Customer’s IoT devices from cyberthreats, monitoring and logging of actions and behaviors associated with protected devices</td>
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The Product does not need and is not meant to collect or process any Special Categories of Personal Data.
Privacy Transparency Notice

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**Personal Data Retention Schedule**

The device does not retain any Personal Data. The Customer being the sole controller of any Personal Data collected or generated by the Product in the Customer’s environment, the retention of any such data is at the Customer’s sole discretion.

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

**Recipients of Personal Data**

All data collected and processed by the Product remains within the Customer’s environment.

**Third-Party Sub-Processors**

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

**International Transfers of Personal Data**

The Customer being the sole controller of any Personal Data collected or generated by the Product in the Customer’s environment, any international transfer of such data is at the Customer’s sole discretion.

**4. Exercise Of Data Subject Rights**

The Product neither collects, nor processes any Personal Data susceptible of being covered by any 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.

**Applicable Information Security Certifications**

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.