Integrated Cyber Defense Exchange (ICDx 1.3)

This Privacy Transparency Notice describes how Symantec’s Integrated Cyber Defense Exchange (ICDx) (“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’s Integrated Cyber Defense Exchange (ICDx) is a free on-premise software which Customers can install to integrate events from multiple Symantec products, so as to normalize event data before pushing it to third-party tools like ServiceNow, Splunk, Elastic, Bay Dynamics, ICA, Microsoft and Anomali. ICDx release 1.3 integrates event data from Symantec Endpoint Protection (SEP)*, Data Loss Prevention (DLP)*, Email Security.Cloud (ESS)*, Data Center Security (DCS)*, Symantec Endpoint Detection and Response (SEDR) on-prem and cloud*, ProxySG/ASG-ISG* and Web Security Service (WSS)*.

2. Personal Data Collection And Processing

Sources of Data

ICDx does not collect or generate any Personal Data of its own, it exclusively ingests event data from such Symantec products and solutions as listed in the description above and in use by the Customer.

Respective Roles of Symantec and Customer

With respect to data collected, stored and processed within the ICDx software deployed in the Customer’s environment, the Customer is the Controller and Symantec does not in any way intervene as a Processor.

However with respect to any Personal Data transmitted from the Customer to Symantec for the purposes of the Product (e.g. case data submitted to Symantec Support), 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>Please refer to transparency notices of the relevant other Symantec products* used by the Customer</td>
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<td>Normalization and push to third-party tools such as listed in the description above</td>
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The Product does not need and is not meant to collect or process any Special Categories of Personal Data.

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Personal Data Retention Schedule

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

Third-Party Sub-Processors

No third-party sub-processor is involved in delivering this on-premise Product.

International Transfers of Personal Data

The Customer as the Controller has sole authority over any cross-border transfers of event data to or from the ICDx platform, which the Customer deploys on their own premises at the location(s) of their choice.

4. Exercise Of Data Subject Rights

The customer as the Controller has sole authority to manage the data fed into and pushed from the ICDx platform deployed on their premises.

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.

* For further information on the Personal Data processing involved in the use of other Symantec Products or Services referenced in this Notice, please refer to those Products’ or Services’ Transparency Notices on the Symantec Privacy - GDPR Portal.