Intelligence Services

This Privacy Transparency Notice describes how Intelligence Services ("Service") 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 involved in using the service.

1. Product Description

Intelligence Services is a cloud-based service that collects and supplies threat intelligence to point products. The service allows devices or software applications such as ProxySG the ability to obtain real-time website categorization, risk ratings, and file reputations for the purpose of enforcing customer acceptable use and security policies.

Further information about the Product is available at:

https://www.symantec.com/theme/global-intelligence-network

2. Personal Data Collection And Processing

Sources of Data

The type of data collected is URLs and file hashes from licensed devices or applications, such as ProxySG* or WSS*. For example, when ProxySG* encounters a web request, it will look in both a local database and in the cloud service (if no match can be made in the local database) to try and establish what category the URL matches. When cloud lookups occur, the URL data, is stored in the cloud database along with other metadata (more details below). The cloud lookup feature is available at the customer’s discretion.

Respective Roles of Symantec and Customer

With respect to Personal Data transmitted from the customer to Symantec for the purposes of the service, 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>Online identifiers and trackers (IP addresses, device IDs and similar unique identifiers, individual product settings and preferences)</td>
<td>Customer employees and contractors, any other individuals operating in the customer’s environment</td>
<td>For security research and abuse prevention</td>
</tr>
<tr>
<td>Network activity data (browsing activity and history, telemetry, traffic data)</td>
<td>Customer employees and contractors, any other individuals operating in the customer’s environment</td>
<td>For security research</td>
</tr>
</tbody>
</table>

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

Identifiers are kept for two years from collection, unless their processing beyond that timeline remains necessary and relevant to the fulfillment of the cybersecurity purpose for which they were collected, and unless their retention is required by applicable law, in which case identifiers covered by such requirements 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</td>
<td>Network activity data</td>
<td>For Security research</td>
<td>Brazil, Japan</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

Pursuant to the applicable Data Processing Addendum, depending on the nature and object of the request submitted by the customer, 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

Personal Data collected for the purposes of the service is protected by the implementation of access controls, segregation of duties, change controls, encryption, secure communications and physical security 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 referenced in this Notice, please refer to those products’ Transparency Notices on the Symantec Privacy - GDPR Portal.