Symantec IT Management Suite (ITMS)

This Privacy Transparency Notice describes how Symantec IT Management Suite (ITMS) ("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 IT Management Suite (ITMS) enables Customers to manage computing devices and peripherals in their environments. The solution is offered to Customers and managed by the Customers directly.

Further information about the Product is available at:


2. Personal Data Collection And Processing

Sources of Data

Data is collected from devices that a Customer manages with ITMS using the Symantec Management Agent portion of ITMS. The data collected is transmitted to a database managed and maintained by the Customer. The database is not managed by or accessible to Symantec except to the extent that a Customer makes it available to Symantec for technical support purposes.

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.

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 and network identifiers, cookies and other device trackers, product settings)</td>
<td>Customer employees and contractors</td>
<td>To track the identity and usage of specified applications on devices managed by ITMS</td>
</tr>
<tr>
<td>Network Activity Data (traffic telemetry, session logs, electronic communications metadata)</td>
<td>Customer employees and contractors</td>
<td>To identify devices that are connected to the network at any point in time</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

As the Controller, the Customer is solely responsible for defining and implementing the retention policies and periods applicable to Personal Data collected through the use of the Product. The use of the Product does not involve Symantec as a Data Processor.
### 3. Disclosure and International Transfer of Personal Data

**Third-Party Sub-Processors**
Symantec involves no third-party sub-processor in delivering the Product to the Customer.

**International Transfers of Personal Data**
As the Controller, the Customer is solely responsible for complying with any rules applicable to the international transfers of Personal Data that the Customer collects by using the Product. The use of the Product does not involve Symantec as a Data Processor.

### 4. Exercise Of Data Subject Rights

The Personal Data collected by ITMS is not transmitted to Symantec. It is retained in a database that is managed and maintained by Customers at a location of their choice. This data is not accessible or available to Symantec unless explicitly provided by the Customer for purposes of technical support. As the Controller, the Customer is therefore solely responsible for complying with any rules applicable to the exercise of Data Subject Rights related to Personal Data that the Customer collects by using the Product. The use of the Product does not involve Symantec as a Data Processor.

### 5. Information Security

**Technical and Organizational Measures**
ITMS uses FIPS 140-2 encryption to protect data while in transit and at rest. ITMS does not transmit personal data to Symantec. As the Controller, the Customer is solely responsible for complying with any rules applicable to the security of the processing of Personal Data that the Customer collects by using the Product. The use of the Product does not involve Symantec as a Data Processor.

Security documentation about the Product itself 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.