This Privacy Transparency Notice describes how Symantec Management Center (“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

Management Center is an on-premise central management tool used to manage and monitor other Symantec Network Protection Products.

Further information about the Product is available at:


2. Personal Data Collection and Processing

Sources of Data

The product collects data from other devices as well as form users interacting with the system.

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 itself 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>Individual online identifiers (names, usernames, device IDs), contact information (email), network activity data (traffic data, session logs)</td>
<td>Customer employees and contractors</td>
<td>Product licensing with a central portal and identification of users logging into the system</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 data 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 and held on premise.

Concerning data transmitted to Symantec for licensing purposes, 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

**Recipients of Personal Data**

Symantec will send Personal Data to internal recipients (affiliated Symantec entities) and, if applicable, 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**

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

**International Transfers of Personal Data**

Data transmitted by the Customer to Symantec will be transferred or accessed (including for storage, backup and archiving) to the U.S.A. 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, based on European Commission Decision C (2010)593 on Standard Contractual Clauses (processors), or of any alternate, legally permitted means.

4. Exercise Of Data Subject Rights

Internal logs and user information stored within the product can be deleted by the customer. Further, pursuant to the applicable Data Processing Addendum, and to the extent possible considering the nature of the processing, Symantec will assist the Customer, insofar as this is feasible, with the fulfilment 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**

Data is collected and stored on the product which resides at the Customer’s location. Access to the data stored on the device is restricted and cannot be accessed under normal circumstances. The device is equipped with strict access control.

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.