

Privacy Data Sheet

Adaptive Network Security (ANS)

This Privacy Data Sheet describes the processing of personal data by Adaptive Network Security (“ANS” or the “Service”).

ANS is provided directly by Lumen to its customers (“Customers”) for use by Customer and Customer’s end users (each an “End User”). Lumen may process personal data Customers provide in the course of providing the Service regarding Customer and Customer’s End Users.

Types of End User personal data

End User personal data may include:

- IPv4 addresses
- Domain names
- Host Names
- Network names
- Operating Systems
- Groups or names associated with accounts
- File information (file name, size & type)
- Port number and packet sizes
- Customer End User traffic destinations
- Enriched data that may include threat intelligence, threat signatures and GeoIP blocking
- URLs
- System logs and traffic statistics
- De-identified threat data

Purpose of processing

Necessary to provide services and troubleshoot

Authorized personnel with access (and reasons)

- **Lumen:** Trouble-shoot and support service
- **Customers:** Through Control Center Customer Portal with access limited to only that Customer’s End User data
- **Fortinet:** May have limited access when required to assist Lumen with troubleshooting

Retention periods

- Rolling 90 days for monitored data and logs, unless extended by contract
- Data overwritten for monitored data
- IP address retained for duration of the Service
- Service logs retained for up to 2 years for service planning purposes

Transfers of personal data across borders

Lumen uses Standard Contractual Clauses to transfer personal data outside the European Economic Area to countries that have not received a determination of adequacy from the European Commission.

Locations where personal data is processed and stored

| Organizations with authorized access to consumer data | Storage location | Access location |
|---|--|---|
| Lumen personnel Customer Fortinet (supplier) | <u>Asia</u> Hong Kong Singapore <u>Australia</u> <u>Europe</u> Netherlands Germany UK France <u>North America</u> Colorado, USA Virginia, USA | Lumen and Customer Personnel: Authorized personnel located anywhere with secure internet access |

Lumen uses Amazon Web Services (AWS) as its cloud service provider for storing data associated with providing ANS. Data is stored in the AWS cloud in Virginia and California in the United States. AWS does not have access to End User personal data. For more information, please review the [AWS Privacy Notice](#).

Sub-processors used (third party suppliers)

Lumen may share personal data described in this Privacy Data Sheet with Lumen affiliates and suppliers.

Lumen uses the following third-party suppliers who also process personal data to provide the Service to Customers and their End Users.

| Third-party suppliers | Country | Supplier's privacy statement |
|---------------------------------------|---------|---|
| Fortinet (security services supplier) | Global | Data Privacy Practices Data Privacy Policy |