

Privacy Data Sheet

Content Delivery Network Service (CDN)

This Privacy Data Sheet describes the processing of personal data by Content Delivery Network Service, including Mesh Delivery, CDN Load Balancer (f/k/a CDN Orchestrator), Intelligent Traffic Manager, CDN Object Storage, and Media Transformation (“CDN” or the “Service”).

CDN is provided 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 (Lumen does not link this information to an individual):

- IPv4 and IPv6 addresses
- Device information
- Device interface information
- Domain names
- Host names
- Network names/numbers
- Network type
- Operating systems
- Geographic region
- Numbers or IDs associated with accounts
- File information (file name, size & type)
- Port ID and packet sizes
- Language used
- NetFlow data -- to optimize egress traffic flow

Purpose of processing

Necessary to provide services and troubleshooting

Authorized personnel with access (and reasons)

- **Lumen personnel:** Trouble-shoot and support service and/or for R&D required to improve the performance of the Services
- **Customers:** Through Control Center Customer Portal with access limited to only that Customer’s End User data
- **Reseller Partners** (if applicable): Troubleshoot and support Service with access limited to only that Reseller’s Customer’s End User data
- **Suppliers:** Troubleshoot and support Service

Retention periods

- Up to 3 months for Lumen CDN monitored data and logs
- For Mesh Delivery and CDN Load Balancer: Personal data is sent to data pipeline on a secure encrypted channel and anonymized in real time at ingestion. Aggregated anonymized data are kept without any limit (one data point per day). Anonymization is not reversible.
- For Mesh Delivery and CDN Load Balancer: Logs of all connections to backend services are sampled and kept for 60 days; these contain the origin IP address, the request, and the status code.

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. The data for Mesh and CDN Load Balancer is stored in the European Union.

Locations where personal data is processed and stored

Organizations with authorized access to End User data	Storage location	Access location
Lumen personnel Customer Reseller partners (if applicable) Nokia/Deepfield MediaKind	Personal data is collected and stored at the locations indicated on the CDN Network Map available here . For Mesh and CDN Load Balancer, the data is stored in Google Cloud in Belgium.	Authorized personnel located anywhere with secure internet access

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	Vendors' privacy statement
IBM (for CDN Object Storage)	EEA, United States	IBM Online Privacy Statement
Nokia/Deepfield	Finland	Nokia Privacy Statement
MediaKind (Media Transformation using Google Cloud)	Australia, Belgium, Brazil, Finland, Germany, Hong Kong, India, Indonesia, Netherlands, Singapore, South Korea, Switzerland, Taiwan, United Kingdom, United States	MediaKind's Privacy Policy
Google Cloud (for Mesh and CDN Load Balancer)	Belgium, United States	Google Cloud Privacy Notice
Amazon (for Mesh & CDN Load Balancer)	United States	https://aws.amazon.com/privacy/