

Dedicated Internet Access (DIA)

Privacy Data Sheet

November 2024

This Privacy Data Sheet describes the Processing of Personal Information by Dedicated Internet Access (“DIA” or the “Service”). The Service combines vital business internet features with maximum global reach and scalability. DIA offers comprehensive connectivity solutions that are scalable, reliable, and secure. Specifically geared for enabling enterprise applications that keep pace with and drive market growth, the Service can help provide the enhanced internet capabilities to business Customers and Partners. Lumen provides the Service directly to its Customers for use by Customers and Customers’ End Users. Lumen may Process Personal Information Customers provide regarding Customer and End Users while providing the Service.

Types of End User Personal Information

End User Personal Information may include:

- IPv4 and IPv6 (source/destination)
- MAC addresses
- Device information
- Device interface information
- Domain names
- Operating systems
- NetFlow data such as Port ID, and packet sizes

Purpose of Processing

Necessary to provide the Service

Authorized Personnel with Access

- **Lumen:** To troubleshoot and support the Service
- **Customer:** Through the Control Center Portal with access limited only to that Customer’s End User information
- **Nokia/Deepfield:** May have limited access when required to assist Lumen with troubleshooting

Retention Periods

Lumen:

- Rolling one-hundred-eighty (180) days for monitoring data
- Data overwritten for monitored data
- IP address retained for duration of the Service
- IP address deleted after Customer terminates contract

Transfer of Personal Information Across Borders

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

Locations where Personal Information is Processed

Organizations with authorized access to Customer Information	Storage location per Customer’s instructions	Access location
Lumen	None	Global: Authorized Personnel located anywhere with secure internet access

Customer	None	Global: Authorized Personnel located anywhere with secure internet access
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Lumen uses Amazon Web Services ("AWS") as its cloud service provider for storing data associated with providing DIA. Data is stored in the AWS cloud in the USA. AWS does not have access to End User Personal Information. For more information, please review the [AWS Privacy Notice](#).

Sub-processors (third party suppliers)

Lumen may copy Personal Information described in this Privacy Data Sheet to Lumen supplier to set up and/or deliver the Service. Lumen uses the following third-party suppliers who may Process Personal Information to provide the Service to Customer and their End-Users.

	Third-party Suppliers and Purposes	Country	Supplier's privacy statement
	Nokia/Deepfield	Finland, Global	Nokia Privacy Statement

To the extent that Customer is purchasing the Service for use within the Asia Pacific, LATAM & EMEA regions, Lumen is reselling that Service and any related access for the Service from the Telecommunications providers listed in each country, as set out below:

	Third-party Suppliers and Purposes	Country	Supplier's privacy statement
	Optus	Australia	Optus Privacy Policy
	China Telecom Americas	China	China Telecom Americas
	CITIC (CPC)	China	China Entercom Privacy Policy
	Cirion	LATAM	Cirion Privacy Policy
	DYXnet	China	DYXnet Privacy Policy Statement
	Bharti Airtel	India	Airtel Privacy Policy
	Tata	India	Tata Communications Privacy Policy
	Sify	India	Sify Privacy Policy
	Linstasarta	Indonesia	None available

	Telin	Indonesia	Telin Privacy Policy
	Orient	Malaysia	Privacy Policy Orient Telecoms (orient-telecoms.com)
	Telekom Malaysia	Malaysia	Telekom Malaysia Privacy Notice
	TIME Telekom	Malaysia	Privacy Policy Time Malaysia
	Telstra (PACNET)	Malaysia, New Zealand, Philippines, South Korea, Taiwan	Telstra Privacy Statement Telstra Global Data Protection Regulation Terms and Conditions
	Spark	New Zealand	Privacy Policy Spark NZ
	GLOBE	Philippines	Privacy Policy - Globe
	PLDT	Philippines	PLDT Privacy Policy
	Taifo (Taiwan Intelligent Fiber Optic)	Taiwan	None Available
	TFN (Taiwan Fixed Network)	Taiwan	None Available
	JasTel	Thailand	None Available
	CMC Telecom	Vietnam	None Available
	FPT Telecom	Vietnam	None Available
	VNPT	Vietnam	None Available
	Colt	EMEA	Binding Corporate Rules on Data Transfer Privacy