# High Speed Internet Protocol (HSIP)

Privacy Data Sheet

November 2024

This Privacy Data Sheet describes the Processing of Personal Information by High-Speed Internet Protocol ("High Speed IP" or "HSIP" or the "Service"). The Service provides access to a global IP backbone across North America, Latin America, Europe, and Asia. This Service includes sophisticated network security, a comprehensive range of port interface speeds, online performance reports, and service management capabilities. By combining Lumen's ability to scale, its extensive network reach, and the reliability of its resilient network, Customers receive a quality IP service with proven performance. 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 (depending upon Customer configurations):

- IPv4 and IPv6 (source/destination)
- Device information
- Device interface information
- Operating systems
- NetFlow data such as Port ID, and packet size

## **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 to only that Customer's End User Information
- Nokia/Deepfield: may have limited access when required to assist Lumen with troubleshooting (Nokia doesn't store customer data, Lumen does.) Nokia (the business) accesses Lumen data through a secure API and makes it available for Lumen using their proprietary software tool called Deepfield.

# **Retention Periods**

#### Lumen:

- Rolling one-hundred-eighty (180) days for monitoring data
- Data overwritten for monitored data
- IP address retained for duration of 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 an adequacy determination from the European Commission.

## Locations where Personal Information is Processed and Stored



Organizations with authorized access to Customer Information	Storage location per Customer's instructions	Access location
Lumen	None	<b>Global:</b> Authorized Personnel located anywhere with secure internet access
Customer	None	<b>Global:</b> 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 HSIP. 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 <u>AWS Privacy Notice.</u>

### Sub-processors (third party suppliers)

Lumen may share Personal Information described in this Privacy Data Sheet to Lumen suppliers for the purposes of setting up and/or delivering the Service. Lumen uses the following third-party suppliers who may Process Personal Information:

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
Cirion	LATAM	Cirion Technologies Privacy Statement
Colt	EMEA	Colt Privacy Statement

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