# Lumen Dedicated Internet Extension (LDIE)

Privacy Data Sheet

November 2024

This Privacy Data Sheet describes the Processing of Personal Information by Lumen Dedicated Internet Extension ("LDIE" or the "Service"). The Lumen Dedicated Internet Extension Service is third-party provided Internet Service where Lumen is acting as the reseller for various internet connections. Lumen may not bill for Services in a country where Lumen does not currently hold a license to operate. Service is quoted by a Lumen sales representative, who collects relevant order information and obtains the order from the relevant third-party provider. Lumen may Process Personal Information Customers provide regarding Customer and End Users in the course of 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
- Operating systems
- NetFlow data such as Port ID and packet sizes
- Network names/numbers

# **Purpose of Processing**

Necessary to provide the Service

### **Authorized Personnel with Access**

- Lumen: support the Service
- Customer: through the Control Center Customer Portal with access limited to only that Customer's End User information
- Third Party Internet Vendor: Installation, troubleshoot, and support services

## **Retention Periods**

### Lumen:

- Rolling one-hundred-eighty (180) days for monitored data and logs
- Data overwritten for monitored data
- IP addresses 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 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   | <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 LDIE. 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 copy Personal Information described in this Privacy Data Sheet to Lumen supplier for the purposes of setting up and/or delivering 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<br>Purposes | Country    | Supplier's privacy statement             |
|---------------------------------------|------------|--|
| Optus                                 | Australia  | Optus Privacy Policy                     |
| AAPT                                  | Australia  | AAPT Privacy Policy                      |
| ADN Gateway                           | Bangladesh | None Available                           |
| China Telecom Americas                | China      | China Telecom Americas Privacy<br>Policy |
| CITIC (CPC)                           | China      | CITIC Privacy Policy                     |
| DYXnet                                | China      | DYXnet Privacy Policy                    |
| Docomo Pacific                        | Guam       | DOCOMO PACIFIC Privacy Policy            |



| COLT              | Hong Kong, Japan,<br>Singapore                                | Colt Privacy Policy                |
|-------------------|---|------------------------------------|
| Tata              | India   | Tata Communications Privacy Policy |
| Sify              | India   | Sify Technologies Privacy Policy   |
| BizNet            | Indonesia   | Biznet Networks   Privacy Policy   |
| Lintasarta        | Indonesia   | None Available                     |
| Telin             | Indonesia   | Telin Privacy Policy               |
| NTT               | Japan   | NTT Privacy Policy                 |
| Softbank          | Japan   | SoftBank's Privacy Policy          |
| KDDI              | Japan   | KDDI's Privacy Policy              |
| Tokia             | Japan   | None Available                     |
| Orient            | Malaysia  | None Available                     |
| Telekom Malaysia  | Malaysia  | TM Privacy Policy                  |
| TIME Telekom      | Malaysia  | Time Privacy Policy                |
| Telstra (PACNET)  | Malaysia, New Zealand,<br>Philippines, South Korea,<br>Taiwan | Telstra Privacy Policy             |
| Frontiir          | Myanmar   | Myanmar Net Privacy Policy         |
| Spark             | New Zealand   | Spark Privacy Policy               |
| Globe             | Philippines   | Globe Privacy Policy               |
| PLDT              | Philippines   | PLDT Privacy Policy                |
| SkyBiz (SkyCable) | Philippines   | SKYBIZ   Privacy Policy            |
| Radius            | Philippines   | Radius Privacy Policy              |



| Singtel                                   | Singapore   | Singtel Privacy Policy         |
|---|---|--------------------------------|
| Starhub                                   | Singapore   | StarHub Data Protection Policy |
| ViewQwest                                 | Singapore   | ViewQwest Privacy Policy       |
| LG Uplus                                  | South Korea   | LG Uplus Privacy Policy        |
| ChungHwa Telecom (CHT)                    | Taiwan  | ChungHwa Privacy Policy        |
| Taifo (Taiwan Intelligent Fiber<br>Optic) | Taiwan  | None Available                 |
| TFN (Taiwan Fixed Network)                | Taiwan  | None Available                 |
| JasTel                                    | Thailand  | Jastel Privacy Policy          |
| UIH                                       | Thailand  | UIH Privacy Policy             |
| Symphony                                  | Thailand  | Symphony Privacy Policy        |
| True                                      | Thailand  | True Privacy Policy            |
| Cat                                       | Thailand  | Cat Privacy Policy             |
| CMC Telecom                               | Vietnam   | None Available                 |
| FPT Telecom                               | Vietnam   | None Available                 |
| VNPT                                      | Vietnam   | None Available                 |
| Tigo                                      | Guatemala, El Salvador,<br>Honduras, Nicaragua, Costa<br>Rica, Panama, Columbia,<br>Bolivia | Tigo Privacy Statement         |



| Bestel           | Mexico   | Bestel Privacy Policy           |
|------------------|--|---------------------------------|
| Orchest          | Mexico, Costa Rica,<br>Guatemala, El Salvador,<br>Venezuela, Columbia,<br>Argentina, Brazil, Chile,<br>Panama, Ecuador, Peru,<br>Bolivia, Uruguay, Paraguay,<br>Puerto Rico, Bahamas, Belize,<br>Bermuda, Curcao, Domican<br>Republic, Trinidad & Tobago,<br>Montserrat                                | Orchest Privacy Policy          |
| Flo Networks     | Mexico   | Flo Networks Privacy Policy     |
| Claro            | Mexico, Guatemala, El<br>Salvador, Nicaragua,<br>Honduras, Puerto Rico,<br>Dominican Republic  | Claro Privacy Policy            |
| Liberty Networks | Puerto Rico, Anguilla, Antigua, Bahamas, Barbados, British Virgin Islands, Cayman Islands, Curacao, Dominican Republic, Dominica, Grenada, Jamaica, Sint Maarten, St. Kitts, St. Lucia, St. Vincent, Trinidad & Tobago, Turks & Caicos, Panama, Costa Rica, Guatemala, El Salvador, Honduras, Columbia | Liberty Networks Privacy Notice |
| Telxius          | Argentina, Brazil, Chile,<br>Ecuador, Peru, Columbia   | Telxius Data Protect Policy     |
| Cirion           | Argentina, Uruguay, Chile,<br>Peru, Ecuador, Venezuela,<br>Columbia, Brazil, Mexico,<br>Panama, Costa Rica, Puerto<br>Rico   | Cirion Privacy Notice           |
| Telefonica       | Mexico   | Telefónica Privacy Notice       |



