

Privacy Data Sheet

Mesh Delivery for Enterprise

This Privacy Data Sheet describes the processing of personal data by Lumen Mesh Delivery for Enterprise (the “Service”).

The Service 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 data

End User personal data may include (Lumen does not link this information to an individual):

- Public and private IPv4/IPv6 addresses
- Device type
- Device interface information
- Domain / host names
- Content URLs
- Network names/numbers
- Network type
- Operating systems
- Geographic region
- File information (file name, size & type)
- Port ID and packet sizes

Purpose of processing

Necessary to provide Services, troubleshooting and/or for R&D required to improve the performance of the Services

Authorized personnel with access (and reasons)

- **Lumen:** Troubleshoot and support services; R&D has access only to anonymized End User data
- **Customers:** Through Customer Dashboard with access limited to only that Customer’s End User anonymized data
- **Reseller Partners (if applicable):** Troubleshoot and support Services with access limited to only that Reseller’s Customer’s End User anonymized data

Retention periods

- End User 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.**
- 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

Data for the Service is stored in the European Union.

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

Storage location	Access location
Data for Services is anonymized, then stored in Google Cloud in Belgium.	Lumen and Customer: 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 Services to Customers and their End Users.

Third-party suppliers	Country	Supplier's privacy statement
Google	Belgium	https://cloud.google.com/terms/cloud-privacy-notice