

# Privacy Data Sheet

## for SD-WAN with Versa Networks

This Privacy Data Sheet describes the processing of personal data by SD-WAN with Versa Networks (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 personal data

SD-WAN without the Optional Security Upgrade does not process End User personal data. However, when Customer purchases the Optional Security Upgrade associated with SD-WAN, Customer End User personal data may be processed. The data processed by the Optional Security Upgrade is a subset of the data processed by Security Log Monitoring (SLM) (See the Privacy Data Sheet for SLM).

### Purpose of processing

Necessary to provide Services

### Authorized personnel with access (and reasons)

- **Lumen:** Troubleshoot and support Service
- **Customer:** Through Control Center Customer Portal with access limited to only that Customer’s End User data
- **Versa Networks:** Troubleshoot and provide Services

### Retention periods

If the Optional Security Upgrade is purchased:

- Security logs are retained for a rolling 90 days unless extended by Customer contract
- Rolling 7 days for logged data unless extended by Customer contract
- Log data deleted within 10 days of notice upon termination of contract for log data

## 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.

## Locations where personal data is processed and stored

Organizations with authorized access to consumer data	Storage location	Access location
Lumen Customer Versa Networks	<u>Asia</u> Hong Kong Japan Singapore  <u>Australia</u>  <u>Europe</u> Germany United Kingdom  <u>North America</u> <a href="#">CenturyLink Data Centers</a> throughout North America	Authorized personnel located anywhere with secure internet access

To the extent that Customer is purchasing the Service for use within the Asia Pacific region, CenturyLink is reselling connectivity or configuring the Service from the providers listed in each country, as set out below:

APAC Provider	Country	Vendors' Privacy Statement
CITIC (CPC)	China	<a href="#">CITIC Telecom CPC Privacy Policy</a>
Tata	India	<a href="#">Tata Communications Privacy Policy</a>

## 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	Supplier's privacy statement
Versa Networks	India, USA	<a href="#">Versa Networks Privacy Policy</a>