

# Privacy Data Sheet

## for Zoom delivered by Lumen

This Privacy Data Sheet describes the processing of personal data by Zoom delivered by Lumen Service (the “Service”).

Lumen is reselling Zoom cloud services 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

End User personal data may include:

- IPv4 and IPv6 address (source/destination)
- MAC addresses
- Device information
- Device interface information
- Device logs
- Domain names
- Operating Systems
- Latitude and longitude
- NetFlow data such as Port ID and packet sizes
- File information (file name, last modification, size & type)
- Usage information (meeting duration, participant information, session quality metrics)
- Account information (including email addresses)
- Subscription plan information (capacity, add-on features, etc.)

### Purpose of processing

Necessary to provide services, and troubleshoot

### Authorized personnel with access (and reasons)

- **Lumen personnel:** Troubleshoot and support service
- **Customers:** Through Control Center Customer Portal and Zoom administrative portal with access limited to only that Customer’s End User data
- **Zoom:** Access to Zoom administrative portal to troubleshoot and support service

### Retention periods

#### *Zoom Meetings and Webinars*

- Account information: 10 years (max)
- User profile, webinar registration data, and structured meeting data: 31 days after account term.
- Cloud recordings: 60 days after account term.
- Files and Images from meetings: 31 days after meeting

*Zoom Chat Client:* 31 days after account term.

#### *Zoom Phone*

- CDRs: 7 years after account term.
- System logs: 31 days
- Call history log, Voicemail recording & transcript, SMS/MMS: 31 days after account term.

#### *Backups and Application Logs*

- Zoom Meetings & Webinar S3 logs and unstructured MMR logs, and Zoom Phone logs: 5 years
- Zoom Meetings & Webinar database backup: 35 days
- Zoom Chat backup: 2 years
- Zoom Phone: 36 days max, depending on data type

## 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 End User data	Storage locations	Access location
Lumen Customer Zoom	<u>Asia</u> Hong Kong Singapore  <u>Australia</u>  <u>Europe</u> France Germany Netherlands UK  <u>North America</u> Colorado, USA Virginia, USA	<u>Asia:</u> Hong Kong Singapore  <u>Europe</u> Germany UK  <u>North America</u> Arizona, USA Colorado, USA Minnesota, USA Washington, DC, USA Montreal, Canada  <b>Lumen, Customer and Zoom Personnel:</b> Authorized personnel located anywhere with secure internet access

Lumen and Zoom use Amazon Web Services (AWS) as a cloud service provider for storing data associated with providing the Service. Data is stored in the AWS cloud in Virginia and California in the United States. AWS does not have access to End User personal data. For more information, please review the [AWS Privacy Notice](#).

## Other processing

Lumen is reselling Zoom cloud services. Zoom is also processing End-User personal data in accordance with the terms and conditions Customer has signed with Zoom available [here](#). For further information Customer can view Zoom's Privacy Statement [here](#).