



ANNEX 1

VERITAS ALTA™ ARCHIVING SERVICE

Data exporter

The Data Exporter is:

Customer and those of its Affiliates that are permitted contractually to use the Veritas hosted archiving service known as Veritas Alta Archiving, Veritas Alta eDiscovery, Veritas Alta Surveillance, or Veritas Alta Classification (each, a “Service”).

Data importer

The Data Importer is:

Veritas Technologies LLC in the following circumstances:

- a) as the Veritas entity that procures the provision of “*follow the sun*” and technical support by the following Veritas entities in the following locations:

Veritas Technologies (UK) Ltd 1320 Arlington Business Park
Theale, Reading Berkshire RG7 4SA United Kingdom

Veritas Storage (Ireland) Limited Ballycoolin Business Park
Blanchardstown Dublin 15 Ireland

Veritas Technologies LLC 2815 Cleveland Avenue
Roseville, MN 55113 USA

Veritas Technologies LLC 1001 International Park Lane
Heathrow, FL 32746 USA

Veritas Software India LLP Tower C, Level 4 & 11-16, Panchshil Business Park Phase 2,
Balewadi High Street, Balewadi, Pune, Maharashtra 411045 India

- b) where Customer has stipulated that the Service shall be provided from a data center in the U.S.

Data subjects

The Personal Data transferred concern the following categories of data subjects (please specify):

In the context of “follow the sun” support: Workers of the Data Exporter that are named as persons authorised to contact Veritas for support.



In the context of usual Service requests made via cloud.dm@veritas.com address: Workers of the Data Exporter

In the context of the processing of the Customer Data in the Service: Workers of the Data Exporter, its Affiliates and the suppliers and customers, and any other categories of individuals that correspond or interact with the Data Exporter in the course of its business.

Categories of data

The Personal Data transferred concern the following categories of data (please specify):

In the context of “follow the sun” support: name, email name, email address, company name and address, job title, contact number.

In the context of usual service requests made via cloud.dm@veritas.com: name, email address, company name and address, job title, contact number, ip address

In the context of the processing of the Customer Data in the Service: Miscellaneous categories of Personal Data that exist in the various communications and documents archived in the Service.

Special categories of data (if appropriate)

The Personal Data transferred concern the following special categories of data (please specify):

In the context of “follow the sun” support: N/A

In the context of usual service requests made via cloud.dm@veritas.com: N/A

In the context of the processing of the Customer Data in the Service: Miscellaneous categories of Sensitive Personal Data that exist in the various communications and documents archived in the Service.

Processing operations

The Personal Data transferred will be subject to the following basic processing activities (please specify):

In the context of “follow the sun” support: employee/worker contact details are used to verify that the person contacting Veritas for support is the employee/worker of Customer and therefore authorised to seek support on Data Exporter’s behalf.

In the context of usual service requests made via cloud.dm@veritas.com: details are used to action and fulfil Data Exporter requests.

In the context of the processing of the Customer Data in the Service: the Personal Data is held by the Data Exporter in the Service for archiving purposes.



Subprocessors

To view a list of current sub-processors which may have access to personal data processed by the Service, please visit: <https://www.veritas.com/content/dam/Veritas/docs/policies/sub-processors-for-veritas-services.pdf>.

For information regarding any historical sub-processors related to your use of the Service, please contact privacy@veritas.com.



ANNEX 2
Security Measures

1. Access control to premises and facilities

Measures must be taken to prevent unauthorized physical access to premises and facilities holding Personal Data. Measures shall include:

- Access control system
- ID reader, magnetic card, chip card
- (Issue of) keys
- Door locking (electric door openers, etc.)
- Surveillance facilities
- Alarm system, video/CCTV monitor
- Logging of facility exits/entries

2. Access control to systems

Measures must be taken to prevent unauthorized access to IT systems. These must include the following technical and organizational measures for user identification and authentication:

- Password procedures (incl. special characters, minimum length, forced change of password)
- No access for guest users or anonymous accounts
- Central management of system access
- Access to IT systems subject to approval from HR management and IT system administrators

3. Access control to data

Measures must be taken to prevent authorized users from accessing data beyond their authorized access rights and prevent the unauthorised [input, reading, copying, removal] modification or disclosure of data. These measures shall include:

- Differentiated access rights
- Access rights defined according to duties
- Automated log of user access via IT systems
- Measures to prevent the use of automated data-processing systems by unauthorised persons using data communication equipment

4. Disclosure control

Measures must be taken to prevent the unauthorized access, alteration or removal of data during transfer, and to ensure that all transfers are secure and are logged. These measures shall include:



- Compulsory use of a wholly-owned private network for all data transfers
- Encryption using a VPN for remote access, transport and communication of data
- Prohibition of portable media
- Creating an audit trail of all data transfers

5. Input control

Measures must be put in place to ensure all data management and maintenance is logged, and an audit trail of whether data have been entered, changed or removed (deleted) and by whom must be maintained.

Measures should include:

- Logging user activities on IT systems
- Ensure that it is possible to verify and establish to which bodies personal data have been or may be transmitted or made available using data communication equipment

6. Job control

Measures should be put in place to ensure that data is processed strictly in compliance with the data importer's instructions. These measures must include:

- Unambiguous wording of contractual instructions

7. Availability control

Measures should be put in place to ensure that data are protected against accidental destruction or loss. These measures must include:

- Ensuring that installed systems may, in the case of interruption, be restored
- Ensure systems are functioning, and that faults are reported
- Ensure stored personal data cannot be corrupted by means of a malfunctioning of the system
- Uninterruptible power supply (UPS)
- Business Continuity procedures
- Remote storage
- Firewall and intrusion detection systems

8. Segregation control

Measures should be put in place to allow data collected for different purposes to be processed separately.



These should include:

- Restriction of access to data stored for different purposes according to employee duties.
- Segregation of business IT systems
- Segregation of IT testing and production environments