

# Privacy Data Sheet for CenturyLink® SD-WAN with Versa Networks

This Privacy Data Sheet describes the processing of personal data by CenturyLink® SD-WAN with Versa Networks (the “Service”).

The Service is provided directly by CenturyLink to its customers (“Customers”) for use by Customer and Customer’s end users (each an “End User”).

## Processing of personal data

CenturyLink may process personal data in the course of providing the Service regarding Customer and Customer’s End Users. Certain personal data may be viewable by others even after it has been deleted by CenturyLink, if the Customer or End User has shared the personal data with others. 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). The privacy data sheet for SLM can be found [here](#).

This table describes how CenturyLink processes personal data in the course of providing the Optional Security Upgrade associated with the Service.

Purpose of processing	Authorized individuals with access (and reason for access)	Retention period and reason for retention/deletion
Necessary to provide services	<p><b>CenturyLink personnel:</b> To troubleshoot and support services</p> <p><b>Customer personnel:</b> Through Control Center Customer Portal with access limited to only that Customer’s End User data</p> <p><b>Versa Networks personnel:</b> To troubleshoot and support service, if asked</p>	<ul style="list-style-type: none"><li>• If the Optional Security Upgrade is purchased,<ul style="list-style-type: none"><li>○ Security logs are retained for a rolling 90 days unless extended by customer contract</li><li>○ Rolling 7 days for logged data unless extended by customer contract</li><li>○ Log data deleted within 10 days of notice upon termination of contract for log data</li></ul></li></ul>

## Transfers of personal data across borders

CenturyLink 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.

CenturyLink processes and stores personal data associated with this service at these locations:

Organizations with authorized access to End User data	Storage location	Access location
<ul style="list-style-type: none"> <li>CenturyLink personnel</li> <li>Customer personnel</li> <li>Versa Networks personnel</li> </ul>	<p><u>Asia:</u> Hong Kong Japan Singapore</p> <p><u>Australia:</u> Australia</p> <p><u>Europe:</u> Germany United Kingdom</p> <p>North America: (<a href="#">CenturyLink Data Centers</a> throughout North America)</p>	<p><b>CenturyLink and Customer personnel:</b> Authorized personnel located anywhere with secure internet access</p>

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 vendors)

CenturyLink may share personal data described in this Privacy Data Sheet with CenturyLink affiliates and vendors.

CenturyLink uses the following third-party vendors who also process personal data to provide the Service to Customers and their End Users.

Third-party vendors	Country	Vendors' privacy statement
Versa Networks	India, USA	<a href="#">Versa Networks Privacy Policy</a>