

GTT *PRIVACY* *DATA SHEET*

FOR EnvisionCLOUD Service

SERVICE DESCRIPTION

This document provides information on how and why we process personal data in connection to the Service, where we store and transfer that personal data, how we keep it secure, and how we comply with applicable privacy laws and regulations. We will process personal data in accordance with this Privacy Sheet and with our Privacy Policy.

ENVISIONCLOUD

EnvisionCLOUD is a computing environment, and associated services made available to Clients for the purpose of operating their applications. GTT provides and provisions computing resources and related services including servers, storage, networking, databases and software applications which are hosted on GTT infrastructure and delivered to the Client over a network and the internet. These services are delivered over shared or dedicated infrastructure in a multiple or dedicated/single tenant architecture and may include Infrastructure as a Service (IaaS) or Platform as a Service (PaaS) where each tenant is allocated assigned Cloud Resources.

Client may order EnvisionCLOUD that includes one or more Services: EnvisionCLOUD Edge, EnvisionCLOUD Core, EnvisionCLOUD Core Private Pod, with accompanying Service options: EnvisionCLOUD Self-Care, EnvisionCLOUD Managed Services and EnvisionCLOUD Professional Services. GTT shall support the EnvisionCLOUD solution by procuring, configuring, deploying, testing, designing, and supporting of solution components. This includes management of Appliances such as edge devices and centrally hosted functions. The EnvisionCLOUD solution also encompasses the set-up, maintenance, and modification of administrative policies as well as full life-cycle management and continuous monitoring of the EnvisionCLOUD Platform. EnvisionCLOUD includes:

EnvisionCLOUD Edge

EnvisionCLOUD Edge enables Client to build a distributed computing and a cloud model for applications and data processing near to their physical location and at the Client's network edge. GTT shall provide computing resource that processes and store data close to where it is generated for low-latency and near-time responsiveness. Computing resource shall be delivered on CPE dedicated for sole use by the Client and located at the Client's Site(s), delivered as virtual machine(s) or physical machine configured and made accessible to Client via a portal. GTT shall deliver VNF(s) on same CPE delivering Cloud Resources for EnvisionCLOUD Edge, unless otherwise specified in the Service Order Form.

EnvisionCLOUD Core.

EnvisionCLOUD Core enables Client to build cloud computing environments provided by GTT in GTT datacentres interconnected via the GTT Network. These consists of the components that support the creation of configurable computing infrastructure, delivering virtual or physical machine(s), storage, connectivity and related components. The infrastructure includes host switching, network, computing, storage, servers and hypervisors made accessible to Client via a portal for processing applications and data.

EnvisionCLOUD Core Private Pod.

EnvisionCLOUD Core Private Pod enables Client to be sole tenant to Dedicated Equipment for computing resource. The Client is the exclusive user of the Dedicated Equipment. The computing resource shall be provisioned in an EnvisionCLOUD Core environment as virtual machine(s) or physical machine(s) configured and made accessible to Client via a portal.

Clients have options of managing their own EnvisionCLOUD Environment or outsourcing this to GTT. The Service models and options are outlined in Table 1 and include:

EnvisionCLOUD Self-Care.

EnvisionCLOUD Self-Care allows Clients to provision and control Cloud Resources. The Client does not manage or control the underlying cloud infrastructure but has control over and responsibility for operating systems, storage, deployed applications and virtualized networking components.

EnvisionCLOUD Managed Services.

EnvisionCLOUD Managed Services allows the Client to outsource management of EnvisionCLOUD Environment including management of operating systems. Under EnvisionCLOUD Managed Services, GTT shall: (a) perform the activities included within EnvisionCLOUD Self-Care; (b) provide Software Licensing where specified; and (c) provide Anti-Virus Updates, Patch Management, Service Monitoring, Server Backups, Data Snapshots, Incident Management, Change Management, and Problem Management for EnvisionCLOUD Core and EnvisionCLOUD Core Private Pod. Applications, middleware and database management are undertaken by the Client.

EnvisionCLOUD Professional Services.

EnvisionCLOUD Professional Services allows Client to outsource specific tasks, either as once-off or recurring, outlined in a Statement of Work. The scope of work is agreed with the Client and is considered relevant to specific Client requirements.

Table 1 - EnvisionCLOUD Service options

	EnvisionCLOUD Self-Care	EnvisionCLOUD Managed Service	EnvisionCLOUD Professional Services
EnvisionCLOUD Edge	Available	N/A	N/A
EnvisionCLOUD Core	Available	Available	Available
EnvisionCLOUD Core Private Pod	Available	Available	Available

For a comprehensive understanding of the Service and its associated commitments, including Service Level Agreements (SLAs), please refer to the EnvisionCLOUD Schedule, available upon request.

TYPES OF (CLIENT) END USER DATA

The Services may process the following categories of personal data:

- Network identifiers and traffic metadata, including IP addresses, MAC addresses, hostnames, device identifiers, routing information, connection records, and abstracted TCP/UDP traffic metadata relating to Client systems and end-user devices..
- User account and authentication information, including usernames, login credentials, authentication records, role and access permissions, and other identity and access management data used to access the Services, portals, or related systems.
- Device and system information relating to Client-managed infrastructure and end-user devices, including operating system information, configuration data, event logs, audit logs, monitoring data, and performance telemetry.
- Geolocation data associated with Client systems and end-user devices, including reverse IP lookup data, GPS coordinates, Wi-Fi location data, and, where applicable, cell-ID derived location information. User authentication Information, such as user login details
- Support and service management data, including business contact details of Client personnel, support ticket content, incident records, change management records, troubleshooting information, and communications relating to provisioning, support, monitoring, configuration, maintenance, and administration of the Services.
- Backup, snapshot, and recovery data to the extent such data contains personal data processed within the EnvisionCLOUD environment
- Client content and other data hosted, transmitted, stored, generated, or otherwise processed by the Client through the Services, the nature and scope of which are determined solely by the Client.
- Client personal data, contents of which are solely determined by the Client.

PURPOSE OF PROCESSING (PROCESSOR)

- Service Provision
- Reporting
- Service Management
- Technical Monitoring
- Customer Support
- Troubleshooting



DATA DELETION & RETENTION

The table below lists the applicable retention periods for each category of personal data processed by GTT in connection to the Service.

Categories of Personal Data	Retention Period
End User Client Personal Data.	For the duration of the Service and for 30 days following Service expiration or as required by applicable law.

DATA LOCATION & STORAGE

Storage Location (Subprocessors)	Access Location
Client Personal Data hosted in GTT-enabled data center. GTT provisions exclusive storage at each client location where services are delivered. Data residency is tied to that location by default; replication or migration to other regions occurs only as instructed by the client and in accordance with the applicable Data Processing Agreement and applicable transfer mechanisms.	GTT Personnel: Authorized personnel located in Bulgaria, India, and USA or other locations with authenticated access into the appropriate management platform. Client: Authorized Client employees, contractors, representatives and end-users depending on their country's location. Sub-processor: Authorized sub-processor personnel with authenticated access into the appropriate management platform depending on their country location.



PERSONAL DATA TRANSFER

To ensure compliant data transfers across jurisdictions, GTT has established an Intra Group Data Transfer Agreement (IGDTA) between GTT's entities. This agreement utilizes the EU Standard Contractual Clauses and other applicable data transfer mechanisms as needed to maintain lawful and secure data processing practices.

ACCESS TO PERSONAL DATA

Users, Client, and GTT can access personal data in connection to the Service as described in the table below.

Parties with Access	Justification	Access Control
Client Personal data	Designated employees authorized to troubleshoot hosting services • Client via the service offered • Potentially GTT's third-party sub-contractors authorized to troubleshoot hosting services	Internal access controls • User authentication • Restricted access may be provided upon request by the Client.
GTT personnel	Troubleshoot, support Service and report.	Corporate Credentials and MFA
Client	Through appropriate management platform with access limited to only that Client's End User Personal Data	Client Credentials and MFA (may be available depending on the technology provided)
Sub-processors	Troubleshoot and support Service	Corporate Credentials and MFA

THIRD-PARTY SERVICE PROVIDERS (SUB-PROCESSORS)

Below is a list of third-party service providers that GTT may use to deliver the service, along with links to their respective privacy policies.

Third-Party Suppliers	Country	Supplier's Privacy Statement
Red Hat Inc.	Global	https://www.redhat.com/en/about/privacy-policy
Microsoft Inc.	Global	https://privacy.microsoft.com/en-us/privacystatement
Oracle Corporation	Global	https://www.oracle.com/legal/privacy/service-s-privacy-policy/#1-1
LiveChat Software	Global	https://www.livechat.com/legal/privacy-policy/
Veritas	Global	https://www.veritas.com/why-veritas/trust/privacy
Cloudian	Global	https://cloudian.com/privacy-policy/
ServiceNow	Global	https://www.servicenow.com/service-privacy.html
ShapeBlue	Global	https://www.shapeblue.com/privacy-policy/
Canonical	Global	https://canonical.com/legal/data-privacy
NetApp	Global	https://www.netapp.com/company/legal/privacy-policy