

GTT PRIVACY DATA SHEET

Fax Cloud Service

SERVICE DESCRIPTION

The Service is a managed cloud fax solution made available by GTT (“we,” “us,” and “our”) to companies (“Client,” “you,” or “your”) for their authorized users (each, a “user”).

GTT’s Cloud Fax service offers Fax-to-Email, Email-to-Fax and optionally Fax-to-HTTPS server application. This helps enable customers to migrate away from legacy POTS lines and to new business telephone systems that cannot support fax.

TYPES OF (CLIENT) END USER DATA

- First and last name
- Email addresses
- Business telephone number
- Traffic data (which may or may not contain personal data)
- Business IP address

PURPOSE OF PROCESSING (PROCESSOR)

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



DATA RETENTION & DELETION

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 Personal Data contained within Traffic Data	Fax to Email: • Successful transmission by e-mail: 1 day in cloud • Failed transmission by e-mail: Upon Client deletion via cloud portal Fax to HTTPS application: • Successful transmission to HTTPS application: 4 days in cloud and the Client is responsible for deleting data on premises. • Failed transmission to HTTPS application: Upon Client deletion via cloud portal Email to Fax: • Successful transmission by e-mail: 1 day in cloud • Failed transmission by e-mail: Upon Client deletion via cloud portal HTTPS to Fax: • Not supported
Call Records	Up to 7 years

DATA LOCATION & STORAGE

- Traffic data and fax messages are stored in third-party fax servers hosted in the United States.

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

Categories of Personal Data	Parties with Access	Access Control
Traffic Data	GTT personnel	Corporate credentials
Traffic Data	Client	Client specific portal credentials initially assigned by GTT to the Client
Traffic Data	Client End-User	Recipient of Fax-to-Email or Fax-to-HTTPS application
Troubleshooting and Billing	GTT personnel Sub-processors	Corporate credentials and MFA-enabled for Sub-processors

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
"IAF Pacific Inc." doing business as "FAXcentric".	United States	https://www.faxback.com/About/Privacy.aspx