

# Product Transparency Notice

For any queries, please contact [privacyteam@symantec.com](mailto:privacyteam@symantec.com)

## Symantec Mail Security for Microsoft Exchange

This Privacy Transparency Notice describes how Symantec Mail Security for Microsoft Exchange (“Product”) collects and processes Personal Data. Its purpose is to provide You (our current or prospective “Customer”) the information You need to assess the Personal Data processing that is involved in using the Product.

### 1. Product Description

Symantec Mail Security for Microsoft Exchange (SMSMSE) provides Antivirus, File Filtering and Content Filtering with optional Premium Antispam for Microsoft Exchange Servers. It supports MS Exchange 2010, MS Exchange 2013 and MS Exchange 2016.

Further information about the Product is available at:

<https://www.symantec.com/products/mail-security-exchange>

### 2. Personal Data Collection And Processing

#### Sources of Data

During installation the customer admin supplies the MS Exchange server's IP, the email ID of an employee to receive security notifications, and admin username and password to run the service. SMSMSE collects data from emails passing through or stored on the customer's MS Exchange server. SMSMSE does not export that data from the customer's environment. The product submits non-personal install count telemetry to Symantec.

#### Respective Roles of Symantec and Customer

With respect to Personal Data collected by the product during its use, the customer is the controller. The use of the Product does not involve Symantec as a data processor.

With respect to any Personal Data transmitted from the customer to Symantec for the purposes related to the Product (e.g. support), the customer is the controller, and your Symantec contracting entity as specified in your applicable Agreement (“Symantec”) acts as a processor. For such cases the rights and obligations of both parties with respect to Personal Data processing are defined in the applicable Data Processing Addendum available on the [Symantec Privacy - GDPR Portal](#).

#### Personal Data Elements Collected and Processed, Data Subjects, Purpose of Processing

Personal Data Category	Data Subject Category	Purpose of Processing
Individual and online identifiers (admin username and password, MS Exchange Server name and IP address), contact information (admin email address)	Customer employees and contractors	Service setup, administration and operation, service communications
Communications data (email metadata and content)	Customer employees and contractors, individuals corresponding with the	Detection and evaluation of malware violations and data leakage, security event logging

	customer's MS Exchange Server	
--	-------------------------------	--

The Product does not need and is not meant to collect or process any Special Categories of Personal Data.

**Personal Data Retention Schedule**

As the data controller of all Personal Data collected or generated by the Product and held within the customer's environment, the customer is solely responsible for defining and enforcing the retention schedule they see fit.

As regards any Personal Data that the customer chooses to transmit to Symantec pursuant to the use of the Product, for the duration of the contractual relationship with the customer, Personal Data is retained as described in the applicable product description. After the expiry or termination of the contractual relationship, Personal Data is decommissioned except where its retention is required by applicable law, in which case Personal Data covered by such requirement will be further retained for the legally prescribed period.

**3. Disclosure and International Transfer of Personal Data**

**Recipients of Personal Data**

During normal operation, the Product does not transmit Personal Data to Symantec. Regarding any Personal Data that the customer chooses to transmit to Symantec pursuant to the use of the Product, Symantec will send Personal Data to internal recipients (affiliated Symantec entities) and, if applicable, external recipients (third party sub-processors). The list of Symantec affiliated entities and their geographical locations are available on the [Symantec Privacy - GDPR Portal](#).

**Third-Party Sub-Processors**

No third-party sub-processor is involved in delivering the Product.

**International Transfers of Personal Data**

You are advised that, if necessary for service delivery or on customer instruction, Symantec and its affiliated entities will transfer Personal Data to locations outside of the European Economic Area, including potentially to external recipients, based on European Commission Decision C (2010)593 on Standard Contractual Clauses (processors), or of any alternate, legally permitted means.

**4. Exercise Of Data Subject Rights**

For troubleshooting purposes customers may provide product logs to Symantec support. Such logs may contain personal data which the customer can rectify or erase before sharing it.

Further, pursuant to the applicable Data Processing Addendum, and to the extent possible considering the nature of the processing, Symantec assists the Customer, insofar as this is feasible, with the fulfillment of the Customer's obligation to respond to requests for exercising Data Subjects' rights such as the rights of access, rectification, deletion and objection laid down in Chapter III of the EU General Data Protection Regulation (GDPR).

**5. Information Security**

**Technical and Organizational Measures**

The customer is solely responsible for the security of any data collected by the product and stored in the customer's environment. Symantec has no access to it. As regards product design and any data submitted by the customer to Symantec during or pursuant to the use of the product, it is Symantec's and all its affiliated entities' commitment to implement, and contractually require all sub-processors to implement, appropriate technical and organizational measures to ensure an

appropriate level of security, considering the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk for the rights and freedoms of Data Subjects. Additional security documentation is available on the [Symantec Customer Trust Portal](#).

This notice is the sole authoritative statement relating to the Personal Data processing activities associated with the use of this Product. It supersedes any prior Symantec communication or documentation relating thereto.