



Product Transparency Notice

For any queries, please contact privacyteam@symantec.com

Symantec Cyber Defense Manager Trial Request Flow

This Privacy Transparency Notice describes how the Symantec Common Trial Request Flow (“Process”) collects and processes Personal Data. Its purpose is to provide You (our current or prospective “Customer”) the information You need in order to assess the Personal Data processing that is involved in using the Process.

1. Process Description

The Symantec Common Trial Request Flow follows three simple steps by which a user can request and obtain trial access to eligible Symantec cloud services, either within the tenant of the organization that the user belongs to, or within an independent new tenant. In the first step, the user signs in to their Norton Secure Login account and request to join the tenant of their organization (Customer). In the second step, the tenant administrator assigned by the Customer is prompted to grant the request. In the third step, if Customer tenant administrator authorization was granted, the user joins the tenant and selects the product for trial, as available within that tenant. Alternatively, if an independent new tenant is created, then the user is designated as tenant administrator.

Further information about the Process is available at:

<https://www.symantec.com/products/endpoint-protection>

2. Personal Data Collection And Processing

Sources of Data

The Process collects user data as provided by the user who enrolls for the trial, and leverages tenant administrator data which Symantec has on record as provided by the Customer.

Respective Roles of Symantec and Customer

With respect to Personal Data transmitted from the Customer to Symantec for the purposes of the Product, the Customer is the Controller, and Your Symantec contracting entity as specified in Your applicable Agreement (“Symantec”) acts as a Processor. 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
General identifiers, contact information and login credentials of the user (name, mailing and email address, username, password)	Customer’s employees, agents and other legitimate users	Access to the platform, submission and processing of the trial request
Contact information of the Customer-assigned tenant administrator (email address)	Customer’s employees, agents and other legitimate users	Authorization of the user’s access to the Customer’s tenant

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

Personal Data Retention Schedule

For the duration of the contractual relationship with the Customer, Personal Data is retained as described in the applicable process and product descriptions. 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

Symantec will send Personal Data to internal recipients (affiliated Symantec entities) and external recipients (third party sub-processors), in the facilitation or provision of the Product. The list of Symantec affiliated entities and their geographical locations are available on the [Symantec Privacy - GDPR Portal](#).

Third-Party Sub-Processors

The third-party sub-processors involved in delivering the Process are:

Sub-Processor	Personal Data	Purpose of processing	Locations
Microsoft Azure	User identifiers and credentials	User authentication	U.S.
AWS	Customer administrator and user identifiers and contact information	Trial request processing, authorization and provisioning	U.S.

This list is subject to change. Any planned change will be announced in advance on the [Symantec Privacy - GDPR Portal](#). Customers can exercise their rights with respect to such changes according to the provisions of the applicable Data Processing Addendum.

International Transfers of Personal Data

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

4. Exercise Of Data Subject Rights

Users and respectively Customer-assigned tenant administrators may access and update editable portions of their data in their Norton Secure Login account and respectively their administration portal. Further, pursuant to the applicable Data Processing Addendum, and to the extent possible taking into account the nature of the processing, Symantec will assist 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

It is Symantec's and all of 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, taking into account 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 Process. It supersedes any prior Symantec communication or documentation relating thereto.