

**Description of the Processing of
Personal Data by Orange as the Client's Data Processor
Managed Applications**

This Processing Description applies to the processing of the Customer's Personal Data for the provision of **Managed Applications**.

Nature of Data Processing Activities	The Customer’s Personal Data is processed to provide the Service in accordance with the applicable Service Description or in accordance with the Customer’s additional instructions.	
	Processing operations include the collection, access, transmission, storage, and erasure of the Customer’s Personal Data, as well as other processing activities depending on the Service’s configuration and options, such as recording, organizing, modifying, combining, pseudonymizing, or anonymizing.	
Purpose of Data Processing Activities		Duration
Activation, implementation, provision, and management of the Service. Incident management and support, including changes to the Service.		For the period necessary to provide the Service, plus one year.
Selon les options choisies :		
Provision of reports (regarding billing, usage, quality of service, and other reports requested by the Customer).		As specified in the Service Description or the Client's instructions
Portals, i.e., providing access to portals, online tools, and other applications dedicated to customers managed by Orange for the provision of its services.		For as long as necessary to provide the services
For cloud hosting and “as a service” features, i.e., hosting the Customer’s Personal Data on a dedicated or shared infrastructure.		According to the Client's instructions
Categories of Customer Personal Data Processed	Contact information: first name, last name, email address, and phone number.	
	Usage data: information related to usage—to the extent that it pertains to individuals—that Orange collects through the services provided to Customers. Support data: information from the service ticket of the Customer’s representative or the user (including questions and comments) and, if applicable, telephone recordings of the Customer’s representative or the user regarding the incident. Identification data: first name, last name, professional ID (CUID). Technical data: technical logs, IP address, connection data, customer login (Portal, Bastion), customer AD ID, and other technical data generated during use of the Service. Cloud Services and “as a service” features:	

	Hosted Data: any category of Personal Data that may be recorded or stored (such as voicemail, call recordings, files) by the Customer and that is hosted on the infrastructure provided by Orange. This includes sensitive data of the health data category.
Categories of Affected Individuals	Employees of the Customer and its Affiliates. Employees of Orange Business. For Hosted Data, any category of Data Subjects, as determined by the Customer.
Authorized Subcontractors	Orange Business affiliates and external suppliers within and outside the EU that process the Customer's Personal Data for the purposes of the Service. Authorized subprocessors engaged solely for the Service are listed below. Authorized subprocessors engaged to provide support or centralized services as part of the Service are disclosed separately to the Customer.

	Authorized Subcontractors in the EU		Authorized Subcontractors Outside the EU	
	Last Name	Country of the contracting entity	Last Name	Country of the contracting entity
Orange Business Affiliates	No issues		Orange Business Egypt Orange Business India Orange Business Madagascar Orange Business Mauritius	Egypt India Madagascar Mauritius
External Suppliers	Azure AWS GCP SAP CyberArk (Alero/PAM)	Ireland Ireland Ireland Germany France		