

Description of Processing of Personal Data by Orange Business Services as Processor for Customer – Article 28 of GDPR

Name of the Service : Flexible Web Platform

1. Processing Activities

Collection (receiving personal data of employees and users of customer who are natural persons...)	Yes
Recording (capturing personal data in a file or software program, including the generation of metadata like Call Details Records...)	Yes
Organization (organizing personal data in a software program...)	Yes
Storage (keeping the personal data in a software program for a determined period, including for archiving purposes...)	Yes
Modification (modifying the content or the way the personal data are structured...)	Yes
Consultation (looking at personal data that we have stored in our files or software programs...)	Yes
Transmission (carrying the traffic that may include personal data on our network using switching and/or routing...)	Yes
Disclosure or otherwise making available (communicating personal data to another recipient by any means...) Except for disclosure mentioned in the service description or required by law, or otherwise specifically directed by the customer, the categories of potential recipients are only those subcontractors referenced herein or otherwise approved by the customer.	Yes
Combination (merging two or more databases with personal data...)	Yes
Restriction (implementing security measures in order to restrict the access to the personal data...)	Yes
Deletion or destruction (deleting or anonymizing the personal data or destroying the hard copies...)	Yes
Other use	No

2. Categories of personal data processed (type of personal data):

<i>Categories of Personal data identifiable by Orange</i>	
Identification data (ID document / number, phone number, email, ...)	Yes
Traffic / Connection data (IP address, Mac address, CDRs, access and usage data, online tracking and monitoring of services)	Yes
Location Data (geographic location, device location)	Yes
CRM data (billing information, customer service data, ticketing info, telephone recordings, etc.)	Yes
Financial data (bank account details, payment information)	No
Sensitive Data (racial/ethnic background, religion, political or philosophical beliefs, trade union membership, biometric data, genetic data, health data, sexual life and/or orientation)	No
<i>Categories of Personal data not identifiable by Orange</i>	
Any categories of personal data that may be contained in the voice, data or internet traffic of Customer carried over Orange network	Yes
Any categories of personal data that may be recorded or stored (voicemail, call recording, files) by Customer and which recording is hosted on Orange infrastructure	Yes

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3. Subject-matter and duration of the processing:

<i>Subject-matter of processing</i>		<i>Duration of processing</i>
Service activation	Yes	For the period necessary to provide the service to the customer
User authentication	Yes	
Routing configuration	No	
Incident Management	Yes	
Quality of Service	Yes	
Invoice, contract, order (if they show the name and details of the contact person of Customer)	Yes	For the period required by applicable law
Itemized billing (= including traffic / connection data of end-users who are natural persons)	No	
Customer reporting	No	For the duration requested by Customer
Carry the traffic of customers end-users	No	For the duration of the transmission
Hosting	Yes	For the duration of the hosting service ordered by Customer
Other	No	

4. Purposes of processing

Provision of the service to Customer

5. Categories of Data Subject:

Customer's employees / self-employed contractors using the service who are natural persons	Yes
Customer's other end-users of the service who are natural persons (client of the Customer ...)	Yes

6. Sub-processors:

	<i>Sub-processors approved by Customer</i>	<i>Safety measures for sub-processors outside of the EU/EEA</i>
Orange Business Services legal entities that are processing information for this Service and that are within the EU/EEA	Orange SA (France)	NA
Orange Business Services legal entities that are processing information for this Service and that are outside of the EU/EEA	NA	Intra-group agreements with standard model clauses, Binding Corporate Rules approval request filed with CNIL
Orange Business Services suppliers which are performing one or more processing activities described above in connection with this Service and that are within the EU/EEA	Platform.sh SAS (France)	NA
Orange Business Services suppliers that are processing information for this Service and that are outside of the EU/EEA	NA	Standard Model Clauses in contract with supplier