

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

### Name of the Service: Flexible Computing Premium

#### 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 (Example: 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)   | No  |
| CRM data (billing information, customer service data, ticketing info, telephone recordings, etc.)  | Yes |
| Financial data (bank account details, payment information)   | Yes |
| 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   | Yes | For the duration requested by Customer                          |
| Carry the traffic of customers end-users   | No  |   |
| 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)<br>Orange Cyberdefense SAS (France)<br>Orange Cloud for Business SAS (France)   | NA   |
| Orange Business Services legal entities that are processing information for this Service and that are outside of the EU/EEA  | Orange Business Services Mauritius Limited (Ile Maurice)<br>Orange Business Services India Solutions Private Limited (India)<br>Equant Egypt for Communications S.A.E (Egypt)                          | 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 | STREAM GLOBAL SERVICES (France)<br>SII (France)<br>SOPRA-STERIA (France)<br>ALTRAN (France)<br>INTITEK (France)<br>HUMANIS (France)<br>SOGETI (France)<br>IBM (France)<br>HP (France)<br>DELL (France) | NA   |

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|  |                                 |  |
|--|---------------------------------|--|
|  | EMC (France)<br>Netapp (France) |  |
| 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 |