

**Description of Processing  
of Personal Data by Orange as Processor for Customer  
Cloud for Business Services: Private Cloud Solutions**

This Description of Processing applies to the Processing of Customer Personal Data for the provision of **Private Cloud Solutions**. This is a general description of all the applicable treatments and associated data categories and a customisation (restriction) of the list remains possible according to the needs expressed by the client.

Nature of the Processing activities	Customer Personal Data are processed to provide the Service in accordance with the Service Description or as further instructed by Customer.	
	Processing operations include collection, hosting, copy, consultation, transfer, conservation (storage, backup) and deletion of Customer Personal Data, as well as other Processing activities in accordance with the configuration and options of each Service, such as recording, organization, modification, combination, pseudonymisation or anonymisation.	
Subject matter of the Processing activities		Duration
Activating and implementing the Services and changes to the Services. Delivering, operating and managing the Services (including intrusion detection and monitoring the Services if ordered by Customer). Incident, change management and support.		For the necessary period to provide the Service plus 6 months.
In accordance with the Service Description and the options selected:		
Reporting, i.e. reports on billing, usage, quality of service and other reports if and as required by the Customer.		As per Service Description or Customer instructions
Portals, i.e. providing access and use of portals, on-line tools and other applications managed by Orange as part of the provision of its Services.		As long as necessary for the provision of the Services
For Cloud hosting, Contact Center and “as a service” features, i.e. hosting Customer Personal Data on a dedicated storage infrastructure.		As per Customer instructions
Types of Customer Personal Data to be Processed	Contact Data: first name, last name, email address, business address and telephone numbers, job role within the Customer.	
	Usage Data: the usage related data to the extent related to natural persons, that Orange collects from Services it provides to its Customers.	
	Support Data: Customer representative or end user service ticket information (including feedback, comments or questions) and if applicable, Customer representative or end user telephone recordings for incident.	

	<p><b>Identity Data:</b> first name, last name, honorific (e.g. Ms, Mr. Dr.,...), username or similar identifier, password, ID document / number.</p> <p><b>Location Data:</b> geographic location, device location, SIM card location for mobile services.</p> <p><b>Technical Data:</b> internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, as well as other technology on the devices natural persons use to access areas of Orange portals, or other technical data generated through the use of the service.</p> <p><b>Traffic/Connection Data:</b> data revealing a communication's origin, destination, route, format, size, time duration, IP address, time zone setting, MAC address.</p> <p><u>For Cloud Services, Contact Center and "as a service" features:</u></p> <p><b>Hosted Data:</b> any categories of Personal Data that may be recorded or stored (such as voicemails, call recordings, files) by Customer and which is hosted on the infrastructure provided by Orange. According to the data hosted by Customer, it may include special categories of Personal Data. This is data of which Orange has no knowledge and which is not processed by Orange.</p>
<b>Categories of Data Subjects</b>	<p>Employees of Customer and of its affiliates.</p> <p>If applicable, other individuals using the Service or whose Personal Data are collected via the Service.</p> <p>For Hosted Data, any category of Data Subjects as determined by the Customer.</p>
<b>Authorised Sub-Processors</b>	<p>Orange Business Services Affiliates in the EU and outside of the EU Processing Customer Personal Data for the purpose of this Agreement and communicated separately to Customer. Private Cloud Solutions projects are tailor-made, including the service delivery model. The response varies from project to project and should be described in the project definition.</p>
	<p>Orange Business Services suppliers in the EU and outside of the EU Processing Customer Personal Data for the purpose of this Agreement and communicated separately to Customer. Private Cloud Solutions projects are tailor-made, including the service delivery model. The response varies from project to project and should be described in the project definition.</p>