PGP (Symantec Encryption Management Server, Symantec Encryption Desktop and PGP Command Line)

This Notice describes how the above designated Product processes Personal Data. It provides the information relevant to assess and document privacy relevant aspects of the use of this Product. This Notice and the relevant terms of the Broadcom Privacy Policy are the authoritative statements relating to the Personal Data processing activities and privacy regulatory compliance aspects associated with the use of this Product.

1.   About this Notice

Product version(s) covered by this Notice:	v10.5.x
Last revision of this Notice:	May 11, 2022

Prior versions of this Notice as applicable to earlier releases of the Product may be available in the Archives. Where this Notice references other Products marked with an asterisk (*), please refer to the separate Notices of such Products.

2.   About the Product

For information on the purpose, features and technical characteristics of the Product, please refer to the documentation at https://www.broadcom.com/products/cyber-security/information-protection/encryption.

Product type:	☐ Hardware	☒ Software	☐ Service	☐ Other
Deployment model(s):	☒ On-premise	☐Cloud-based	☐ Hybrid	☐ Other

3.   About the Processing Operation(s) performed by / for the purpose(s) of the Product

This Product:	☒ Must process Personal Data to deliver its core feature(s)	☐ Does not require processing any Personal Data to deliver its core feature(s)
This Product:	☒ Has optional features that may process Personal Data	☒ Such optional features are active by default ☐ Such optional features are inactive by default
This Product processes:	☒ Non-sensitive Personal Data	☒ Sensitive Personal Data ☐ Not applicable
The Product involves:	☐ Profiling of individuals based on personal characteristics	☐ Automated decision making that produces legal or other significant impacts on individuals

The Product only processes sensitive data to the extent strictly necessary for the purpose of applying encryption to it.

4.   About the Personal Data processed by / for the purpose(s) of the Product

Categories of Personal Data	Categories of Data Subjects	Purpose(s) of Processing	Categories of Data Recipients	Needed for core features (Yes/No)	Processing location(s)	CA Inc. acts as Processor (Yes/No)
Individual identifiers and contact details	Customer admins	Product management and reporting	Customer admins	Yes	Customer premises	No
Online identifiers	Customer's end-users	Product configuration, user management, server communications	Customer admins	Yes	Customer premises	No
Electronic communication and network activity data	Customer's end-users	Protection of information, outbound email encryption, machine recovery	Customer's end-users	Yes	Customer premises	No
Any other data fed to the Product by the Customer	Customer's end-users	Implementation of encryption	Customer's end-users	Yes	Customer premises	No

5. About managing the Personal Data processed by / for the purpose(s) of the Product

Privacy Enhancing Technologies

Subject to more detailed information provided in the Product description and other customer literature e.g. on optional Product settings and configurations available, the Product has the following technical and organizational capabilities to enhance and protect the privacy of the Personal Data it processes:

Privacy Objective	Privacy Enhancing Technologies / Measures	Data at rest	Data in transit[a]
Data confidentiality	Access control measures	☒	☐
	Encryption	☒	☒
Data integrity	Anti-tampering technology	☐	☐
	Change logging	☐	☐
Data availability	Business continuity measures (e.g. failover)	☐	NA
	Disaster recovery measures (e.g. backups)	☐	NA
Data incident	Detection and flagging of incidents	☐	NA
	Response mechanisms to incidents	☐	NA

[a]Data in transit encompasses traffic between client systems and SaaS endpoints.

Data Subject Rights

The Customer has full control and sole responsibility for servicing Data Subject Rights applicable to Personal Data collected by the Product. All such data is stored in the Customer's environment.

Personal Data Retention Schedule

The Customer has full control and sole responsibility for defining and enforcing the retention schedule(s) of Personal Data collected by the Product. All such data is stored in the Customer's environment.

6. About Regulatory Compliance Matters

Data Processing Addendum

Where your use of the Product or of related services involves CA Inc., its parent and/or affiliates acting as a Data Processor on your behalf, the rights and obligations of both parties with respect to such Personal Data processing, including as regards disclosures and cross-border transfers of Personal Data to and/or by CA Inc., its parents and/or affiliates and any of their sub-processors, are defined in the applicable Data Processing Addendum available at https://www.broadcom.com/company/legal/ca/data-transfers.

CCPA Compliance

If you are subject to the California Consumer Privacy Act and require CA Inc., its parent and/or affiliates to enter into CCPA-based service provider terms with you, please use our CCPA Customer Agreement Supplement available at https://www.broadcom.com/company/legal/ca/data-transfers.

Sub-Processing

Not applicable