



Acquia Campaign Studio

Last revision of this Product Notice: [v1.1 – 17 May 2021 – hyperlinks updated]
 Prior version(s) of this Product Notice: [v1.0 – 04 March 2021 – initial version]

This Product Notices describes the privacy relevant aspects of the above-mentioned Acquia product/services.

About the Product

Acquia Campaign Studio is a marketing automation platform where Customers can build email campaigns, personalize messages, execute A/B tests, and measure results. Customers may add any data about the recipients of such email campaigns and personalize messages based on such data. Customers identify in their sole discretion what Personal Data of their recipients is used for the personalization of the respective email campaign. In its own discretion, Customer can connect Campaign Studios with its third-party tools (e.g. CRM) by using connectors supplied by Acquia.

For details about this Product, please refer to the Product Description available online at <https://docs.acquia.com/guide>.

1. Processing Operation(s)

The objective of Processing of Personal Data by data importer is the performance of the Services pursuant to the Agreement.

- Processing of Personal Data to deliver its core functionalities required: yes no
- Optional features processing Personal Data: yes no
 - The optional features are deactivated by default: yes no n/a*
- Processing of sensitive Personal Data: yes** no n/a*
- Profiling of individuals based on personal characteristics: yes no n/a*
- Automated decision making that produces legal or other significant impacts on individuals: yes no n/a**

* (n/a = not applicable)

** (optional; depends on the Customer's configuration of the system, the connection to other systems, and the categories chosen by the Customer to be collected from Third Party Users)

2. Details of Personal Data being processed

Categories of Personal Data	Categories of Data Subjects	Purpose of Processing	Categories of Data Recipients	Needed for Core Features	Processing Location	Acquia Inc. acts as Processor
Through the configuration, design, and administration of their own Acquia Campaign Studio instance, Customer in its sole discretion determines and controls the categories of Personal Data collected by their Acquia Campaign Studio instance. Customer has full access and autonomy over what types of data are tracked and has access to this data and can manipulate it in various ways. The categories of Personal Data could be any category the Customer chooses, e.g. commercial information, purchasing tendencies, records of personal properties, contact information including home address, personal email, phone numbers, geolocation, age, date of birth, first name, gender, height, last name, marital status, nationality, racial or ethnic origin, religion / religious beliefs, sexual orientation, or other unique personal identifiers, including sensitive Personal Data.	Through the configuration, design, and administration of their own Acquia Campaign Studio instance, Customer in its sole discretion determines and controls the categories of data subjects collected by their Acquia Campaign Studio instance. Customer has full access and autonomy over what types of data are tracked and has access to this data and can manipulate it in various ways. Primarily, the categories of Data Subjects are the recipients and addressees of Customer's email marketing campaigns.	Provision of the Services by Acquia to Customer. Data collected is processed by Acquia Campaign Studio only for the purposes of delivering tailored email marketing to the Customer's marketing campaign recipients. Any usage of the data beyond is in the sole discretion of the Customer.	Customer's personnel	yes	Depends on the data center location chosen by customer; data collected in a given region will exist only within that region. Subprocessors, Support: see Acquia Affiliates If Customer uses the Service to connect to third parties (e.g. CRM), processing of the respective data may occur at the place of such third party. Such third parties are (sub-)processors of Customer, not Acquia.	Yes



3. Privacy Enhancements

Objective	Technology / Measure	Data at Rest	Data in Transit
Anonymization and Pseudonymization	Data anonymization at Customer level optional for Customer	No	No
Data confidentiality	Access control measures Encryption at customer level Encryption at Acquia level Encryption at Acquia Sub-processor level (see Security Annex and Product Description)	Yes n/a * n/a * Yes	Yes Yes Yes Yes
Data integrity	Ant-tampering technology (see Security Annex)	Yes	Yes
Data availability including restoring availability, restoring access to personal data, and data resilience	Business continuity and disaster recovery measures (see Security Annex)	Yes	Yes
Regular testing, assessing and evaluating of TOMs	Regular security and process reviews (see also Security Annex)	Yes	Yes

* encryption at subprocessor level used

4. Data Subject Rights

n/a

5. (Personal) Data Retention Cycles

Profile data can be deleted and updated at any time during the Term of the Service by the Customer. Profile data and application/configuration is retained latest until the end of the subscription term.

6. Sub-Processing

The specific list of sub-processors is available from: www.acquia.com/about-us/legal/subprocessors

Any current Acquia customer with a data processing agreement in place with Acquia may subscribe to receive notifications of new or changed sub-processors through above website.

7. Description of the technical and organisational security measures implemented by the data importer in accordance with Clauses 4(d) and 5(c) (or document/legislation attached)

Data importer has implemented and will maintain appropriate administrative, physical, and technical safeguards for the protection of the security, confidentiality and integrity of Personal Data uploaded to the Services, as described in the Acquia Security Annex (available from <https://www.acquia.com/about-us/legal/gdpr>) applicable to the specific Services purchased by data exporter, as updated from time to time, and made available by data importer upon request. The data exporter is wholly responsible for implementing and maintaining security and data administration within any data exporter applications, configuration settings, or log settings used by data exporter in conjunction with the Services.