Acquia Edge
(Powered by Akamai)

Prior version(s) of this Product Notice: *[v1.0 – 17 March 2022 – initial version]*

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

About the Product
Acquia Edge consists of the following services:

1. Acquia Edge CDN
2. Acquia Edge Web Application & API Protection
3. Acquia Edge WAAP & Bot Management

Acquia Edge CDN
Acquia Edge CDN provides global content delivery network (CDN) and website optimization services for web traffic on domains hosted by Acquia, excluding Chinese web traffic.

Acquia Edge Web Application & API Protection
Acquia Edge Web Application & API Protection provides web application firewall (WAF), distributed denial of service (DDoS) mitigation, global content delivery network (CDN), and website optimization services for web traffic on domains hosted by Acquia, excluding Chinese web traffic.

Acquia Edge WAAP & Bot Management
Acquia Edge WAAP & Bot Management provides advanced bot management, web application firewall (WAF), distributed denial of service (DDoS) mitigation, global content delivery network (CDN), and website optimization services for web traffic on domains hosted by Acquia, excluding Chinese web traffic.

Acquia Edge is a service provided by Akamai Technologies, Inc.**,** 145 Broadway Cambridge, MA 02142 ("**Akamai**") and resold by Acquia to Acquia's customers. Akamai is a Sub-processor to Acquia.

For details about this Product, please refer to the Annex contained within the relevant Order Form.

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)*

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 the Service, Customer in its sole discretion determines and controls the categories of personal data by the Service. These may be names, titles, position, employer, contact information (email, phone, fax, physical address	Through the configuration, design, and administration of the service, Customer in its sole discretion determines and controls the categories of data subjects collected by the Service: Natural persons that (i) access or use the Customer's domains, networks, websites, application programming interfaces ("APIs"), and applications,	Provision of the Services by Acquia to Customer	Site administrators	yes	globally through Akamai's network as described here: https://www.akamai.com/our-thinking/cdn/what-is-a-cdn .	Yes

etc.), identification data, professional life data, personal life data, connection data, or localization data (including IP addresses).	or (ii) are authorized users such as the Customers' employees, agents, or contractors..					

3. Privacy Enhancements (incl. CIA)

Objective	Technology / Measure	Data at Rest	Data in Transit
Anonymization and Pseudonymization	Data anonymization at Customer level optional for Customer	☐	☐
Data confidentiality (incl. encryption)	Access control measures Encryption at customer level Encryption at Acquia level Jurisdiction restrictions for (private) key storage and option to choose data center locations (see Security Annex and Product Description)	☒ ☒ ☒ ☒	☒ ☒ ☒ ☒
Data integrity	Ant-tampering technology (see Security Annex)	☒	☒
Data availability including restoring availability, restoring access to personal data, and data resilience	Business continuity and disaster recovery measures (see Security Annex)	☒	n/a
Regular testing, assessing and evaluating of TOMs	Regular security and process reviews (see also Security Annex)	☒	n/a

4. Certifications (on Sub-processor level)

Refer to **https://www.akamai.com/legal/compliance** for the following Akamai services, as applicable: Kona Site Defender, Dynamic Site Accelerator, Bot Manager. Your Acquia account team may supply you with copies of the relevant compliance documentation, where the Akamai account team is otherwise referenced, as applicable.

5. Data Subject Rights

Through the Product's administration console the Customer may manage, update, retrieve, and erase individual Personal Data.

6. (Personal) Data Retention Cycles

Customer Account Information - Customer Account Information includes customer registration and contact information, audit logs, and other logs and data about account configurations and settings. We store Customer Account Information as long as a Customer has an active account, and we set specific timeframes for retaining Customer Account Information following deletion of an account based on the reason for collection and applicable law. In addition, upon deletion of an account or upon receipt of an individual's request to be forgotten, we may be required to retain the email address associated with the account for an extended period of time, and potentially block that email address from creating a new account in the future, in order to comply with legal obligations and our terms.

Operational Metrics - Acquia stores server and network activity data and logs collected by Akamai in the course of operating the Service and our observations and analysis of traffic data (together, "Operational Metrics") up to 12 months or as long as we have a legitimate business purpose for retention.

Edge Server Logs capture traffic delivery metadata on our edge servers that perform the customer traffic processing & proxying. We do not store the POST body, and we remain oblivious to the content we deliver on behalf of our customers at all times. Edge Server logs contain basic traffic metadata including:

- Client IP address, forward IP address,
- URL,
- HTTP method, Response code,
- Non-sensitive headers such as Host, Content-type, Accept Language, Content Length,
- A large number of Akamai-specific indicators for caching, mapping, and performance decisions.

Potentially sensitive HTTP headers including Cookie, Referrer, and User-agent string are only logged if explicitly configured so.

Long term storage depends on the type of log and the applicable requirements. For instance, logs containing personal information such as IP addresses (e.g., Edge Server logs above) are only kept for 45-90 days as GDPR mandates. Security event logs including Authgate accesses are kept for at least 1 year as required for various security compliance regimes.

Detailed reference on Akamai's personal data processing behaviors as a sub-processor to Acquia Edge Powered by Akamai: https://www.akamai.com/content/dam/site/en/documents/akamai/overview-of-akamai-personal-data-processing-activities-and-role.pdf

7. 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 the above website.

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

Acquia 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 applicable to the specific Services purchased by Customer, as updated from time to time, and made available by Acquia upon request. Customer is wholly responsible for implementing and maintaining security and data administration within any Customer applications, configuration settings, or log settings used by Customer in conjunction with the Services.

In addition, Akamai's security program includes further security measures as detailed here https://www.akamai.com/legal/compliance/privacy-trust-center.