



Acquia Personalization

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 Personalization is a subscription service that unifies person profile data collected from Customer’s Drupal or non-Drupal websites, and, if Customer purchases Acquia Personalization Premium or Acquia Personalization Starter-Premium, other sources, such as the Customer’s own CRM system and email. Acquia Personalization tracks the behavior of anonymous and identified customers throughout their customer journey; from first point of interaction to becoming a repeat customer. Acquia Personalization creates a unified profile for each person (Customer’s customers) based on their historical and real-time behavior and lets the Customer (a) track its (third party) customers’ behavior throughout their buying journey and (b) allows the Customer to create personalized web experiences for its customers.

For details about this Product, please refer to the Product Description available online at <https://docs.acquia.com/guide>. For Acquia Content Hub connected to Acquia Personalization, please see the respective Product Notice for Acquia Content Hub, also available from <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 Personalization instance, Customer in its sole discretion determines and controls the categories of data subjects collected by their Acquia Personalization 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 Personal Data are limited to marketing activities and could be browsing time, IP address, website history, geolocation information, account (to Customer’s website) age, account	Through the configuration, design, and administration of their own Acquia Personalization instance, Customer in its sole discretion determines and controls the categories of data subjects collected by their Acquia Personalization 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 could be Customer’s end-users including visitors to Customer’s website or online shop.	Provision of the Services by Acquia to Customer. Data collected is processed by Acquia Personalization only for the purposes of delivering tailored web content to the Customer’s customers. 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	Yes

number.						
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3. Privacy Enhancements

Objective	Technology / Measure	Data at Rest	Data in Transit
Anonymization and Pseudonymization	Data anonymization at Customer level optional for Customer	Yes	Yes
	End-customer (Customer’s customers) accounts are encrypted and not decryptable by Acquia	Yes	Yes
Data confidentiality	Access control measures	Yes	Yes
	Encryption at customer level	No	No
	Encryption at Acquia level (see Security Annex and Product Description)	No	No
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)	No	No
Regular testing, assessing and evaluating of TOMs	Regular security and process reviews (see also Security Annex)	Yes	Yes

4. Certifications

n/a

5. Data Subject Rights

n/a

6. (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 for at least seven days after the end of the subscription term (to allow a data transfer/data return to the Customer).

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 above website.

8. 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.