Acquia Site Factory

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

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
- Optional features processing Personal Data:
  - The optional features are deactivated by default: yes
- Processing of sensitive Personal Data: yes**
- Profiling of individuals based on personal characteristics: yes
- Automated decision making that produces legal or other significant impacts on individuals: yes

* (n/a = not applicable)
** (optional; depends on the Customer’s Drupal application)

2. Details of Personal Data being processed

<table>
<thead>
<tr>
<th>Categories of Personal Data</th>
<th>Categories of Data Subjects</th>
<th>Purpose of Processing</th>
<th>Categories of Data Recipients</th>
<th>Needed for Core Features</th>
<th>Processing Location</th>
<th>Acquia Inc. acts as Processor</th>
</tr>
</thead>
<tbody>
<tr>
<td>Through the configuration, design, and administration of their own Drupal application, Customer in its sole discretion determines and controls the categories of personal data collected by their Drupal Application. These may be individual identifiers, contact details, online identifiers, network activity, location data, and any sensitive data categories.</td>
<td>Through the configuration, design, and administration of their own Drupal application, Customer in its sole discretion determines and controls the categories of data subjects collected by their Drupal Application. Primarily, these would be Customer’s end-users including visitors to Customer’s website.</td>
<td>Provision of the Services by Acquia to Customer</td>
<td>Site administrators; customers and visitors of Customer’s Drupal application</td>
<td>yes</td>
<td>Depends on the data center location chosen by customer</td>
<td>Yes</td>
</tr>
</tbody>
</table>

3. Privacy Enhancements

<table>
<thead>
<tr>
<th>Objective</th>
<th>Technology / Measure</th>
<th>Data at Rest</th>
<th>Data in Transit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anonymization and Pseudonymization</td>
<td>Data anonymization at Customer level optional for Customer</td>
<td>☒</td>
<td>☒</td>
</tr>
</tbody>
</table>
Data confidentiality
- Access control measures
- Encryption at customer level
- Encryption at Acquia level
  (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)

Regular testing, assessing and evaluating of TOMs
- Regular security and process reviews (see also Security Annex)

4. Certifications
- SSAE16/ISAE 3402: SOC 1 Type II
- SOC 2 Type II
- ISO 27001:2013
- FedRAMP

5. Data Subject Rights
Through the Product’s administration console and through the Customer’s own Drupal application, the Customer may manage, update, retrieve, and erase individual Personal Data.

6. (Personal) Data Retention Cycles
The retention of data in the Product is managed by the Customer and may be stored during the entire term of the Services. Latest 90 days after the end of the contractual term of the Services, Acquia will purge any customer data in the Services including personal data from its systems.

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.