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

### About the Product
Acquia Site Studio is a Drupal module plus SaaS service to enable low-code site building. For details about this Product, please refer to the Product Description available online at [https://docs.acquia.com/guide](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
- Optional features processing Personal Data:
  - 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 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>The Service does not process personal data.</td>
<td>The Service does not process personal data.</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</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>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Data confidentiality</td>
<td>Access control measures Encryption at customer level Encryption at Acquia level (see Security Annex and Product Description)</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Data integrity</td>
<td>Ant-tampering technology (see Security Annex)</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Data availability including restoring availability, restoring access to personal data, and data resilience</td>
<td>Business continuity and disaster recovery measures (see Security Annex)</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Regular testing, assessing and evaluating of TOMs</td>
<td>Regular security and process reviews (see also Security Annex)</td>
<td>n/a</td>
<td>n/a</td>
</tr>
</tbody>
</table>

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

5. **Data Subject Rights**

n/a

6. **(Personal) Data Retention Cycles**

Data is retained in the Customer’s Drupal application, not in the Service.
7. **Sub-Processing**


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](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.