

VMware SD-WAN by VeloCloud – Privacy Datasheet

ABOUT VMWARE SD-WAN BY VELOCLOUD

VeloCloud, now part of VMware simplifies branch WAN networking by automating deployment and improving performance over private, broadband Internet and LTE links for today's increasingly distributed enterprises. VMware SD-WAN includes: a choice of public, private or hybrid cloud network for enterprise-grade connection to cloud and enterprise applications; branch office enterprise appliances and optional data center appliances; software-defined control and automation; and virtual services delivery. Learn more at <https://www.vmware.com/products/sd-wan-by-velocloud.html>

ABOUT VMWARE'S PRIVACY PROGRAM?

- Cloud Trust Center – At VMware, we want to bring transparency that underlies trust. *The VMware Cloud Trust Center* is the primary vehicle to bring you that information.
- Data Privacy Officer - Please contact VMware's Privacy Team at privacy@vmware.com or by mail at Office of the General Counsel of VMware, Inc., 3401 Hillview Ave, Palo Alto, California, 94304, USA.

How VMware SD-WAN by VeloCloud brings value to you!

VMware SD-WAN™ by VeloCloud® (“VeloCloud” or “Service Offering”) is a cloud-based network overlay that allows enterprise users to connect to any available transport and reliably connect to applications deployed on-cloud or off-cloud. All to ensure optimal performance and user experience for business-critical applications, even in cases where the underlying transport links carrying the application degrade in quality. Customers typically use the VMware SD-WAN service to rapidly deploy new branch office or store locations and centrally manage policy and operations of these sites without the need of technical staff to be present at the branch.

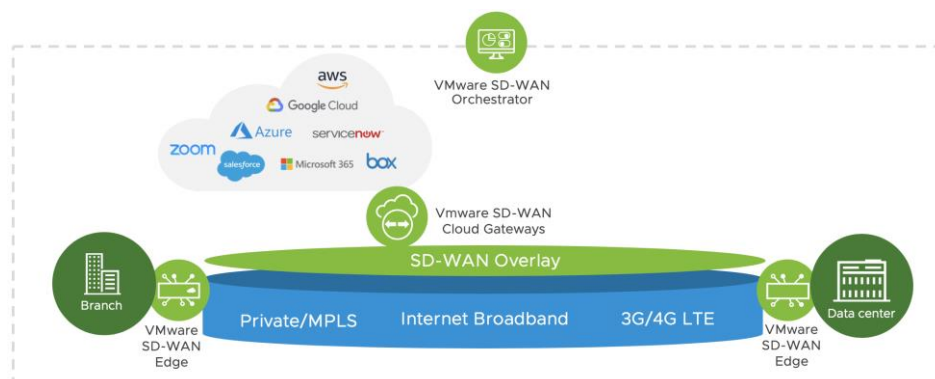


FIGURE 1: VMware SD-WAN by VeloCloud

VMware SD-WAN Gateways, unique to the VMware SD-WAN cloud infrastructure, are the strategically deployed and highly available VMware SD-WAN Gateways. These onramp cloud devices offer the added benefit of real-time monitoring, dynamic steering of traffic, and link remediation on the underlying single or multiple public WAN connections without adding inefficiency of the network hairpin effect. The VMware SD-WAN Orchestrator collects envelope metadata directly from the VMware SD-WAN Edge Devices, including flow statistics (source and destination IP address, source MAC address, protocol and ports, application and application category) and link statistics (ISP name, Public IP address, bandwidth, latency, packet loss and jitter). No network payload information from your network traffic is sent to or stored on the VMware SD-WAN Orchestrator, nor is it stored on VMware SD-WAN Gateways. For more information on the Service Offering, see the VeloCloud [Service Description](#).

VMware and Privacy

In a complex world of data and the digital era our goal is simple: at VMware, you, our customers, and your data are our primary concern. VMware takes privacy and data protection very seriously and is committed to providing clear information about how we collect, use and process your personal data. We have established policies and practices designed to protect the personal data we process on behalf of our customers (as a processor), and as a controller. We are also committed to privacy-by-design when designing our products and services and VMware’s Privacy Team works with the development teams to identify and embed privacy controls for customers.

The personal data collected and processed by VMware are largely dependent on the type of offering you purchase. This Privacy Datasheet provides you with information about how VMware processes and protects your personal data in connection with the VeloCloud Service Offering.

Types of Personal Data Collected by VeloCloud

VMware collects and further processes the following categories and types of personal data in connection with the provision of the Service Offering to the Customer:

Personal Data Category	Personal Data Attributes	Purpose of Processing
Identity Details	Name, email addresses and phone numbers	These data points are input by your IT administrator when they set up the account. Your IT administrator(s) receives a username and password and they in turn are the ones who can generate other accounts for your other IT administrators. We use the phone number for SMS, for administrators who elect to receive text alerts.
Employment and Qualifications	Employer, work title, work address	These data points are a part of the standard account details for your IT administrator.

SECURITY, CERTIFICATIONS AND THIRD-PARTY ATTESTATIONS

- All compliance certifications are available in the [VMware Cloud Trust Center's Compliance Page](#).

<p>Online Identifiers</p>	<ul style="list-style-type: none"> - IP/MAC Address of customer systems (from servers located, for example in data centers). - IP/MAC Address of end-user desktops and devices - Device Information including unique identifiers, device type, carrier, operating system, model, system, etc. - Login credentials (username and passwords for users) and security authentication data 	<p>To provide the SD-WAN service.</p>
<p>Location Data</p>	<ul style="list-style-type: none"> - Geo-location information (reverse IP look-up, GPS coordinates, Wi-Fi) of customer systems - Geo-Location Information (reverse IP look-up, GPS coordinates, Wi-Fi, cell ID) of end-user desktops and devices 	<p>Used to assign infrastructure components for a particular site location. Distance between location of infrastructure components. Where Edge is located relative to the Gateways.</p>
<p>Communication Data</p>	<p>Telecom information (cell number and carrier information)</p>	<p>Used for two-factor authentication.</p>

Personal data other than listed above may also be included in any content that the customer submits to the Service Offering. VMware may not know what types of personal data are submitted to the Service Offering by the customer and the customer is responsible for understanding the types of personal data processed in connection with the customer's use of the Service Offering.

How We Protect Data Processed in Connection with the Operation of Our Business (as a Controller)

In connection with VMware's provision of the Service Offering to the Customer, VMware processes the types of data shown in the below table, which may include personal data. In this instance, VMware is acting as a "controller" and determines the purposes of the processing.

Data Category	Purposes for which it is used
Relationship Data – Authentication and customer account information	Used to provision the Service Offering, such as managing the account and maintaining relationship data. See VMware Products and Services Privacy Notice for details.
Service Operations Data – Configuration Data, Feature Usage Data, Authentication Data, Performance Data, Service Logs, Security Logs, Diagnostic Data, Support and Survey Data.	Information used to facilitate the delivery of the Service Offering, including managing and monitoring the infrastructure, and providing support. See VMware Products and Services Privacy Notice for details.
Service Usage Data – Configuration Data, Feature Usage Data, Performance Data.	Information used for VMware’s own analytics and product improvement purposes See VMware Service Usage Data Program disclosure for details.

The following privacy notices explain the different ways in which VMware collects, uses and protects any personal data included in the above categories of data:

[VMware Privacy Notice](#): This notice addresses the personal information we collect when you purchase VMware products and services and provide account-related personal information.

[VMware Products and Services Privacy Notice](#): This notice applies only to the limited personal information we collect and use for our own purposes in connection with our provision of VMware products and services, including (i) any cookies and similar tracking technologies we may use when providing the products or services; (ii) any information we use to facilitate the delivery of VMware services; and (iii) any data we collect to improve our products and services and our customer’s experience.

On-Premise Deployments

Customers have the option to deploy and manage on-premise versions of both the VMware SD-WAN Orchestrator and Gateway. When utilizing on-premise deployments for both these devices the customer has complete control and responsibility for all types of data listed in the table above.

How We Protect Data as a Service Provider (as a Processor)

In connection with the provisioning of the Service Offering, VMware will process personal data contained in Customer Content (as such term is defined in the relevant VMware agreement, e.g. [VMware Terms of Service](#)) on behalf of the Customer. In this instance, VMware is acting as a “processor” (acts on the instruction of the controller), while the Customer has the role of the “controller” (determines the purposes of the processing).

Data Protection Addendum

VMware's obligations and commitments as a data processor are set forth in VMware's [Data Processing Addendum](#) ("DPA"). VMware will process personal data contained within Customer Content in accordance with the applicable agreement and the DPA. The applicable agreements for each product and service, including the VMware Terms of Service, the Service Descriptions for each specific service, and other relevant legal document can be found [here](#).

Data Storage and Cross-Border Data Transfers

VMware SD-WAN by VeloCloud offers enables customers to choose the data residency location of the data collected by the service and stored on the SD-WAN Orchestrator. This location is selected at service instantiation and offers the choice of the United States, Canada, Singapore, France, Germany, India or Australia. Backups of the data, used to provide disaster recovery capabilities, are kept in the same region. Hosting location options are constantly evolving so please visit the [Sub-Processors list](#) for up-to-date primary and disaster recovery location details.

For cross-border personal data transfers, VMware has achieved Binding Corporate Rules ("BCR") as a processor, thus acknowledging we have met the standards of the EU General Data Protection Regulation for international transfers of personal data it processes on behalf of our customers. View the VMware BCR or the EU Commission BCR Listing in the [VMware Cloud Trust Center](#).

DATA PRIVACY REQUESTS

If you wish to exercise any of your rights under applicable data privacy laws for personal data processed by your organization while using the Service Offering, please contact your organization. See [VMware's Privacy Notice](#) for information about how to exercise your rights where VMware is processing personal data in connection with its business operations.

FOR MORE INFORMATION OR TO PURCHASE VMWARE PRODUCTS

Contact your VMware account representative or call 877-4-VMWARE (outside North America, +1-650-427-5000), visit vmware.com/products, or search online for an authorized reseller.

UPDATES

Reading from a PDF? Don't be outdated, be informed! Find the latest information in the current version of this document from the [VMware Cloud Trust Center's Privacy Page](#).

Sharing with Sub-Processors

For the Service Offering, VMware utilizes third-party companies to provide certain services on its behalf. As set forth in the Data Processing Addendum, VMware has agreements and data transfer mechanisms in place with each sub-processor.

Sub-processors providing supporting functionality for the Service Offering is available in the [Support Services Sub-Processor List](#).

Data Retention and Deletion Practices

VMware retains personal data that we may collect in connection with the customer's use of the Service Offering for as long as it is needed to fulfill the obligations of the VMware Terms of Service. The [VMware Data Processing Addendum](#) and the [Terms of Service](#) set forth how personal data contained in Customer Content is deleted after contract expiration or termination.

During the Subscription Term, metadata transmitted to the Service Offering by you will be retained and available for querying and alerts for at least two weeks (by default) from the date and time the data point was originally ingested into the Service Offering. The amount of metadata stored depends on the storage space available on the VMware SD-WAN orchestrator and the amount of metadata generated by each site's VMware SD-WAN Edge. Upon termination of your account with VMware SD-WAN all customer content will be deleted as specified in the [Service Description](#). VMware advises customers to retrieve all data before the account termination takes place.