VMware Horizon Service – Privacy Datasheet

How VMware Horizon Service brings value to you!

VMware Horizon Service ("Horizon Service" or the "Service Offering") includes two variations: VMware Horizon Subscription and VMware Horizon Cloud Service on Microsoft Azure.

**VMware Horizon Subscription** delivers virtual desktops and applications from VMware based infrastructure. Customers can choose whether to host their virtual desktops and applications in on-premises servers or in supported SDDC infrastructure, such as VMware Cloud on AWS.

**VMware Horizon Cloud Service on Microsoft Azure** delivers virtual desktops and applications from a customer’s own Microsoft Azure infrastructure capacity. Customers pair their Microsoft Azure infrastructure capacity with the Service Offering.

Both variations of the Horizon Service use the Horizon Cloud Control Plane, which orchestrates and manages the customer’s virtual desktops and applications. VMware cannot access the content of customer desktops or applications through the Horizon Cloud Control Plane or otherwise. However, VMware hosts certain data related to the management and use of such desktops and applications as further described in this Privacy Datasheet.

For more information, see the Service Description for VMware Horizon Service available here.
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 developing products and services. VMware’s Privacy Team actively 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 VMware Horizon Service.

Types of Data Collected by Horizon Service

The only cloud element of Horizon Service which is hosted by VMware is the Horizon Cloud Control Plane.

In connection with the customer’s use and VMware’s provision of the Horizon Cloud Control Plane, VMware collects, and further processes data as classified in the table below. Horizon Cloud Control Plane collects a limited amount of data for service administration and licensing purposes such as order number, SID, SKU, quantity of users, license duration, type of license, as well as IT Administrator usage data such as login times, and audit information tracking changes to service configuration and operations that are conducted when administrators log into and use the Service Offering. In some instances, personal data may be included in such data. Generally, this is limited to personal data of Customer’s IT administrators who use and operate the Service Offering.

In addition, the customer may use features of the Service Offering, such as Universal Broker, Image Management Service, and Cloud Monitoring Services, to collect certain data about the end users’ usage and configuration of the virtual desktops and applications (Pods), for example, login times and location (using IP address), application and desktop launches, RDSH performance data, RDSH server hostname. To the extent Customer configures the Service Offering to sync with any end user directory, the name of the user may be processed. IP address is also collected to broker the connection between an end-users device and the virtual machine, and to identify the country and city of POD locations. For detailed information on data collected by Universal Broker, Image Management Service, and Cloud Monitoring Services, please consult the Horizon Service Cloud Security Overview.
<table>
<thead>
<tr>
<th>VMware Data Classification</th>
<th>Description and Purpose of processing</th>
<th>Categories of Personal Data</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Content</td>
<td>Content submitted by customer to the Service Offering for processing, storage, or hosting (described as “Your Content” in VMware’s Terms of Service). To the extent the Service Offering processes Customer Content, VMware processes such Content to provide the Service.</td>
<td>Generally, customer controls and determines which type of personal data it submits to the Service Offering. The specific personal data processed will depend on the customer’s specific configurations and deployment. Contact Information, such as end-user name (if the Service Offering is configured by customer to process such information).</td>
</tr>
<tr>
<td>Support Request Content</td>
<td>Data provided by customer to VMware to address a technical support issue.</td>
<td>Any personal data customer shares with VMware in connection with a support request (as controlled and determined by customer).</td>
</tr>
<tr>
<td>Account Data</td>
<td>Data collected and used by VMware to manage the customer account and maintain the relationship with customer, such as to bill the customer or deliver notifications and alerts.</td>
<td>Contact Information, such as customer name, email address, address and phone number. Online Identifiers such as customer’s IP address or login credentials.</td>
</tr>
</tbody>
</table>
SECURITY, CERTIFICATIONS AND THIRD-PARTY ATTESTATIONS

- All compliance certifications are available in the VMware Cloud Trust Center’s Compliance Page.

| Service Operations Data | Data used by VMware to facilitate the delivery of the Service. This may include (i) tracking entitlements, (ii) providing support, (iii) monitoring the performance, integrity, and stability of the Service’s infrastructure, and (iv) preventing or addressing Service or technical issues. For example:
- Configuration, usage and performance data
- Authentication Data
- Service logs, security logs, and diagnostic data
- Survey and feedback data |

| Service Usage Data | Information used by VMware for analytics, product improvement purposes, and proactive support. See VMware Trust & Assurance Center for additional details regarding VMware’s Service Usage Data Program (SUDP). For example: Configuration, usage and performance data. |

| Contact Information, such as customer administrators’ email address. |
| Online Identifiers such as administrators’ and end-users’ IP and MAC address, login credentials or login time stamps. |

How We Process and Protect Data as a Controller

To the extent VMware processes personal data as part of Account Data, Service Operations Data and Service Usage Data, VMware acts as the Controller in respect to such personal data. The following privacy notices explain how VMware collects, uses and protects any personal data in its capacity as a Controller:

VMware Privacy Notice: This notice addresses the personal data we collect when you purchase VMware products and services and provide account-related personal data.

VMware Products and Services Privacy Notice: This notice applies only to the limited personal data 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.
How We Process and Protect Data as a Processor

Where VMware processes personal data contained in Customer Content in connection with the provisioning of the Service Offering, VMware will process such personal data on behalf of the customer as a “processor” (acts on the instruction of the controller). The customer is the “controller” of any personal data contained in Customer Content and 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 Horizon Service, including the VMware Terms of Service, the relevant Service Description, and other relevant legal documents can be found here.

Data Storage and Cross-Border Data Transfers

Horizon Service currently stores Customer Content in data centers located in the USA, Japan, Germany, Australia, Ireland, and the United Kingdom. Hosting location options may be added from time to time 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. VMware’s BCR for processors can be found 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.

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. A list of these sub-processors is available here.

Additional sub-processors providing support functionality for the Service Offering is available in the Support Services Sub-Processor List.

VMware also provides customers with an easy mechanism to monitor changes to our list of sub-processors. If you would like to receive notifications, please visit this page here.

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 relevant Service Description set forth how personal data contained in Customer Content is deleted after contract expiration or termination. Customer Content will be deleted within 90 days from customer’s deletion request. VMware advises you to retrieve any data you wish to retain before the account termination takes place. VMware has no obligation to retain data beyond 30 days of the effective termination date.

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.