ExtremeCloud: Data Processing Description

1.0 Subject matter of processing
The subject matter of the data processing carried out by Extreme Networks is the provision of ExtremeCloud to the Customer, as further described in the services agreement between Extreme Networks and the Customer.

2.0 Duration of processing
Data will be processed over the period for which ExtremeCloud is provided to the Customer.

3.0 Nature and purpose of processing
Data will be subject to various types of processing, which may include collection, organisation, structuring, storage, disclosure by transmission, dissemination, management, configuration, supervision, troubleshooting, maintenance and analytics.   Data is processed for ExtremeCloud's Customers to benefit from secure wired and/or wireless connectivity in their facilities (including related troubleshooting).

4.0 Categories of data
The categories of data that ExtremeCloud processes may include:
- Device-specific data, including MAC addresses, device manufacturers, IP addresses, hostnames and radio attributes.
- Network access data, including access point data and Network/SSID connection data.
- Geographic location data.
- Network usage data, including wireless throughput rates, error rates, radio channel, band and RSS data, and usage of network application data.
- Contact information, including names, email addresses and social media usernames or IDs.

5.0 Categories of data subjects
The data that ExtremeCloud processes relates to categories of data subjects that may include:
- The Customer's employees, temporary employees, contractors, visitors and guests to the Customer's premises, and actual and potential customers of the Customer's own products and/or services (to the extent that any of these data subjects connect to the wireless network service offered by ExtremeCloud).
- Employees of the Customer's vendors, service providers and commercial partners services (to the extent that any of these data subjects connect to the wireless network service offered by ExtremeCloud).

6.0 Processing operations
The data that ExtremeCloud processes is subject to various processing operations, as set out under section 3.0 above.

7.0 Data transfers
In order to provide ExtremeCloud to the customer, data may be transferred between Extreme Networks entities, some of which may be located outside of the EEA.
- The name and location of any such entities will be set out in the service agreement between Extreme Networks and the Customer.
- The categories of data and data subjects that these transfers may involve is listed under sections 4.0 and 5.0 above.
- Data transferred will be subject to various types of processing, which may include the processing listed under section 3.0 above.

8.0 Additional information regarding technical and organisational security measures

All instances of ExtremeCloud software, and customers' related data (configuration, statistics, etc.), currently are hosted in the Amazon cloud availability zone located in Frankfurt, Germany. The Amazon Web Services ("AWS") support team is not authorized to access/view data in ExtremeCloud. Visibility to AWS is limited to infrastructure level information (CPU, Memory, connectivity details). On March 26, 2018, AWS announced that it had "completed the entirety of [its] GDPR service readiness audit, validating that all generally available services and features adhere to the high privacy bar and data protection standards required of data processors by the GDPR." See https://aws.amazon.com/compliance/gdpr-center/.

In addition, data storage is done using MongoDB clusters deployed by DBaaS provider mLab and stored in the AWS Frankfurt region. Only our application cluster hosted in AWS has access to the database deployment, and this is enforced using an IP whitelisting for the nodes in the application cluster for connections to the database. For additional information about MLab's data security features, see https://docs.mlab.com/security/.