

## Axway Product Privacy Notice for Flow Manager Service

January 2022

*Please read this Privacy Notice carefully to understand Axway policies and practices regarding how personal data may be collected and processed through Flow Manager, and how the product processes that data.*

Flow Manager Service is used by customers to centrally govern flows spanned around different products such as Transfer CFT and SecureTransport. Flow Manager provides a set of services and templates that enable you to configure and deploy file transfer patterns. Flow Manager also provides API services to extend the MFT functionality.

This privacy notice covers the product offered as a Service solution. Flow Manager Service publish MFT services into Amplify Central. Customer can define their partners in the Amplify Central and start subscribing the partners to the MFT services.

### SCOPE OF THIS PRODUCT PRIVACY NOTICE

This Privacy Notice applies solely to processing of personal data through Flow Manager Service when you use the product.

Unless otherwise specified, this Privacy Notice does not apply to any other information processed in any other way (whether online or offline).

For processing of personal data by Axway in the course of our business relationship, please refer to Axway's Privacy Statement (<https://www.axway.com/en/privacy-statement>), and Axway's Privacy compliance program (<https://www.axway.com/en/gdpr>).

### PERSONAL DATA PROCESSED BY THE PRODUCT

When using the Flow Manager service, the user's management is delegated to the Amplify Platform. Same for the Audit part, which will be managed by Amplify Analytics. Partners Management is done mainly via Amplify Central. Please refer to the corresponding Product Privacy Notice for personal data processing in other products.

For each partner you wish to onboard on your Flow Manager, the following information may be provided by Axway customers who subscribe to MFT services.

- Identification of the partner (Name)

For the Partner's management, Flow Manager Service keeps a copy of the definition available in the Amplify Central. The following information are duplicated in Flow Manager:

- Identification of the partner (Name)

That information may be personal data if the identification of the User and/or their email address relates for instance to the name of an identified or identifiable individual.

Flow Manager Service does not require other personal data or any sensitive data, if you choose to process personal or sensitive data through Flow Manager, you warrant that you are duly authorized to process those data and that you do so lawfully in compliance with relevant legislation.

As per our general terms and conditions for subscription services, Axway shall not access your content except in response to support or technical issues where you provide us with prior written authorization, required to access such content.

## **PROCESSING OF PERSONAL DATA BY THE PRODUCT**

### **Who is the data controller?**

When you choose to process personal data through the product, you are the controller of the processing and therefore warrant that your processing is compliant with all laws and regulations in force applicable to your processing of personal data (Applicable Laws and Regulations), including the Regulation (EU) 2016/679 (General Data Protection Regulation).

### **What is the purpose of the processing of personal data by the product?**

As data controller, you determine the purpose of the processing of personal data, if any, you make using the product.

App typically processes data, which may be personal data, for the following purpose:

- (i) for the performance of a contract to which the data subject is party, or
- (ii) to take steps at the request of the data subject prior to entering into a contract.

Axway Support personnel may have access to personal data that the customer has entered in the application. This may be used to onboard the customer or troubleshoot support cases. For example, a customer may extract server logs and send them to Support for troubleshooting.

As the controller of the processing, you are responsible for ensuring that any processing you make using the product is compliant with the Applicable Laws and Regulations. Please note that depending on your specific use of Flow Manager, the purpose of the processing may differ. Axway shall have no responsibility if your use of the product is not compliant with the Applicable Laws and Regulations.

### **Is Axway a data processor?**

When Flow Manager Service is used, and you process personal data through the product, Axway is a processor of such personal data, on your behalf.

If any personal data is to be processed by Axway as a data processor on your behalf, it is mandatory to establish a data processing agreement ("DPA" as completed on our website or otherwise agreed to in writing) in which you determine the purposes and means of the data processing you want Axway to process on your behalf.

In any case, it remains your responsibility and liability (as controller) to implement effective technical and organizational measures and be able to demonstrate the compliance of processing activities even if the processing is carried out by Axway acting as data processor on your behalf.

### **When Axway is processor, are there sub-processors?**

Sub-processors: Flow Manager Service is hosted by Amazon Web Services Inc. at the location defined in your subscription agreement. Axway has appropriate Data Protection Agreements in place with Amazon Web Services.

## **ACCESS AND RETENTION POLICY WITHIN THE PRODUCT**

As user of Flow Manager Service and controller of the processing, you determine the access and retention policies applicable to the data you process with SecureTransport. Axway does not have access to your data or parameters you configure and therefore cannot manage on your behalf requests from eventual data subject (rectification, erasure...), unless otherwise expressly mutually agreed in the DPA.

When Axway is a processor, and unless otherwise expressly agreed in the agreement or the DPA, we will delete or return to you all personal data we may have after the end of the provision of the services related to the processing.

## **SECURITY MEASURES**

As data controller, it is your responsibility and liability to implement effective technical and organizational measures, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using the technical or organisational measures, and be able to demonstrate the compliance of your personal data processing activities.

When Axway is a processor of personal data on your behalf in the use of the Product, the applicable security measures are those provided in the DPA (security measures attached to the DPA or specific security measures as agreed).

## **CHANGES TO THIS PRODUCT PRIVACY NOTICE**

Axway will review and update this Privacy Notice periodically and will note the date of its most recent revision above. If we make material changes to this Privacy Notice, we will notify you either by prominently posting a notice of such changes prior to implementing the changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how Axway is collecting, using, retaining, protecting, disclosing, and transferring your information.