Axway Product Privacy Notice for Flow Manager

April 2024

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.

The product is used by customers to govern flows. Flow Manager enables customers to augment their existing API infrastructure with an event-driven layer for publishing data from your APIs by making them available as real-time Flow Manager of events that can be consumed by web, mobile or any other applications.

This privacy notice covers the product offered in a Customer Managed Environment only.

SCOPE OF THIS PRODUCT PRIVACY NOTICE

This Privacy Notice applies solely to processing of personal data through Flow Manager 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).

NO PERSONAL DATA PROCESSED BY AXWAY

There is no personal data processing by Axway through Flow Manager itself, even though personal data may be processed through other products in your environment. For Axway products, please refer to the corresponding Product Privacy Notice for personal data processing.

PERSONAL DATA PROCESSED BY THE CUSTOMER THROUGH THE PRODUCT

For each partner you wish to onboard on to Flow Manager, the following information may be required:

– Identification of the partner (Name)
– Email address
– Contact

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.

Identifiable information around flow partners (name, email, telephone number) data is stored in the configuration database in Flow Manager and is not encrypted. Each partner may have the definition of one contact, but this does not have to represent an actual person and it is optional. The software allows the manual deletion of partners and data. We recommend that to use a generic, non-personal contact definition for the partner, e.g., Partner_Name@axway.com as contact email address and Partner Name Contact as contact person name.

For user management we recommend:

- the usage of an external Identity Provider or
- generic, non-personal user accounts (internal users).

Each user must have an identifier (User id, which is a different field then the name or the email). The User id is stored in logs/audit events and is not encrypted. We recommend keeping retention periods as short as possible to avoid exposure of data as a very simple first measure, by adjusting the purging routines

As per our general terms and conditions for subscription services, we 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.

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.