

Description of Processing of Personal Data by Orange Business Services as Processor for Customer – Article 28 of GDPR

Name of the Service: Platform.sh by Orange

1. Processing Activities

Collection (= receiving personal data)	Yes
Recording (=saving or capturing personal data in a file, including the generation of metadata like CDRs)	Yes
Organization (Example: organizing personal data in a software program)	Yes
Storage (Example: putting the personal data in a software program)	Yes
Modification (= modifying the content or the way the personal data are structured)	Yes
Consultation (= looking at personal data that we have stored)	Yes
Transmission (= carrying the traffic that may include personal data on our network)	Yes
Disclosure or otherwise making available (= communicating personal data to another recipient by any means)	Yes
Combination (= merging two databases with personal data)	Yes
Restriction (= implementing security measures in order to restrict the access to the personal data)	Yes
Deletion or destruction(=deleting or anonymizing the personal data or destroying the hard copies)	Yes
Other use (if "YES" to be detailed)	No

2. Categories of personal data processed (type of personal data):

<i>Categories of Personal data identifiable by Orange</i>	
Identification data (ID, phone number, email , ...)	Yes
Traffic / Connection data (IP address, Mac address, CDRs, access and usage data, online tracking and monitoring of services)	Yes
Location Data (geographic location, device location)	Yes
CRM data (billing information, customer service data, ticketing info, telephone recordings, etc..)	Yes
Financial data (bank account details, payment information)	No
Sensitive Data (racial/ethnic background, religion, political or philosophical beliefs, trade union membership, biometric data, genetic data, health data, sexual life and/or orientation)	No
<i>Categories of Personal data not identifiable by Orange</i>	
Any categories of personal data that may be contained in the voice, data or internet traffic of Customer carried over Orange network	Yes
Any categories of personal data that may be recorded or stored (voicemail or call recording) by Customer and which recording is hosted on Orange infrastructure	Yes

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3. Subject-matter and duration of the processing:

<i>Subject-matter of processing</i>		<i>Duration of processing</i>
Service activation	Yes	For the period necessary to provide the service to the customer
User authentication	Yes	
Routing configuration	No	
Incident Management	Yes	
Quality of Service	Yes	
Invoice, contract, order (if they show the name and details of the contact person of Customer)	Yes	For the period required by applicable law
Itemized billing (= including traffic / connection data of end-users who are natural persons)	No	
Customer reporting	No	For the duration requested by Customer
Carry the traffic of customers end-users	No	For the duration of the transmission
Hosting	Yes	For the duration of the hosting service ordered by Customer
Obligation to answer legal requests from authorities	Yes	For the duration required by applicable local law in each country in which the service is provided to end-users who are natural persons
Other [if yes please describe]	No	

4. Purposes of processing

Provision of the service to Customer	Yes
Answering legal requests from authorities	Yes

5. Categories of Data Subject:

Customer's employees / self-employed contractors using the service who are natural persons	Yes
Customer's other end-users of the service who are natural persons (client of the Customer ...)	Yes

6. Sub-processors:

	<i>Sub-processors approved by Customer</i>	<i>Safety measures for sub-processors outside of the EU/EEA</i>
List Orange Business Services entities that are processing information for this Service and that are within the EU/EEA	Orange SA (France)	NA
List Orange Business Services entities that are processing information for this Service and that are outside of the EU/EEA	NA	Intra-group agreements with standard model clauses, Binding Corporate Rules approval request filed with CNIL
List all Orange Business Services suppliers which are performing one or more processing activities described above in connection with this Service and that are within the EU/EEA	Platform.sh SAS (France)	NA
List Orange Business Services suppliers that are processing information for this Service and that are outside of the EU/EEA	NA	Standard Model Clauses in contract with supplier