Privacy Notice

SecureDoc by WinMagic

Privacy Transparency Notice

For any queries, please contact **privacy@winmagic.com**

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WINMAGIC

SecureDoc by WinMagic

SecureDoc Enterprise Server

This Privacy Transparency Notice describes how SecureDoc Enterprise Server – Endpoint Encryption ("Product"), collects and processes Personal Data. Its purpose is to provide You (our current or prospective "Customer") the information You need to assess the Personal Data processing that is involved in using the Product.

1. Product Description

SecureDoc Enterprise Server (SES) provides capabilities to manage and protect sensitive customer data at rest using encryption technologies.

SES allows users to use features like Full Disk Encryption, BitLocker on Windows, FileVault on macOS. SES is used for managing various kinds of keys, users, and policies for all the features.

Further information about the Product is available at:

https://www.winmagic.com

2. Personal Data Collection And Processing

Sources of Data

SES is an on-premise product that is installed and managed by customers in their own environment. All data is processed and is retained in the customer's environment. WinMagic does not obtain any data.

The product collects data at the time of configuration, endpoint enrollment, and regular communication from endpoints.

Respective Roles of WinMagic and Customer

With respect to Personal Data collected by the product during its use, the customer is the controller. The use of the Product does not involve WinMagic as a data processor.

Personal Data Elements Collected and Processed, Data Subjects, Purpose of Processing

Personal Data Category	Data Subject Category	Purpose Of Processing
Individual identifiers (names), contact information (email, phone, address*), financial information* (payment information*, banking details*, transaction records*)	Customer employees and contractors and potentially data subjects of other entities interacting with the customer	User management and reporting, license issuance and invoicing (data categories marked with an asterisk are only used for licensing and invoicing purposes)

Personal Data Retention Schedule

The retention period of communications data is 90 days and for other data categories it is for the duration of the contractual relationship with the Customer. Personal Data is retained as described in the applicable product description. After the expiry or termination of the contractual relationship, Personal Data in WinMagic's possession – if any at all – is decommissioned, except where its retention is required by applicable law, in which case Personal Data covered by such requirement will be further retained for the legally prescribed period.

3. Disclosure and International Transfer of Personal Data

Third-Party Sub-Processors

No third-party sub-processor is involved in delivering the Product.

International Transfers of Personal Data

As the controller, the customer is solely responsible for complying with any rules applicable to the international transfers of Personal Data that the customer collects by using the product. The use of the product does not involve WinMagic as a data processor.

4. Exercise of Data Subject Rights

Customer-assigned product administrators can manually update or delete all Personal Data. Further, pursuant to the applicable Software License Agreement, and to the extent possible taking into account the nature of the processing, WinMagic will assist the Customer, insofar as this is feasible, with the fulfillment of the Customer's obligation to respond to requests for exercising Data Subjects' rights such as the rights of access, rectification, deletion and objection laid down in Chapter III of the EU General Data Protection Regulation (GDPR).

5. Information Security

Technical and Organizational Measures

It is WinMagic's and all of its affiliated entities' commitment to implement appropriate technical and organizational measures to ensure an appropriate level of security, taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk for the rights and freedoms of Data Subjects.

Applicable Information Security Certifications

WinMagic's software uses FIPS 140-2 approved cryptography. Certificates available:

https://csrc.nist.gov/projects/cryptographic-module-validation-program/Certificate/1880

https://csrc.nist.gov/projects/cryptographic-module-validation-program/Certificate/1881

Appendix: List of offerings covered by this Notice

SecureDoc Enterprise Server

SecureDoc Cloud Sync

SecureDoc CloudVM

SecureDoc on Top for BitLocker

SecureDoc for Windows

SecureDoc for Servers

SecureDoc for FileVault2 and iOS

SecureDoc for HP

SecureDoc for Lenovo