

# SECURITY AND PRIVACY WHITE PAPER

# Poly CloudConnect and Poly PrivateConnect

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### Introduction

This white paper addresses security and privacy related information for the Poly CloudConnect and Poly PrivateConnect solutions (powered by Pexip). This whitepaper also describes the security features and access controls in HP | Poly's processing of personally identifiable information or personal data ("personal data") and customer data in connection with the running of these products, as well as the location and transfer of personal and other customer data. HP | Poly uses such data in a manner consistent with the HP | Poly Privacy Statement and this white paper (as may be updated from time to time). This white paper is supplemental to the HP | Poly Privacy Statement. The most current version of this white paper will be available on HP | Poly's website.

# **Poly CloudConnect**

Poly CloudConnect enables video interoperability with Microsoft Teams and Google Meet without adding complexity. Adding video makes collaboration feel more personal—and more effective. With Poly CloudConnect, it's easy to connect your video conferencing systems to Microsoft Teams (or Skype for Business) and Google Meet meetings. More details can be found here.

# **Poly PrivateConnect**

Poly PrivateConnect is a self-hosted, virtualized, and distributed multipoint conferencing platform. It can be deployed in an organization's own datacenter, or in a private or public cloud such as Microsoft Azure, Amazon Web Services (AWS), Google Cloud Platform (GCP) or Oracle Cloud Infrastructure, as well as in any hybrid combination. It enables scaling of video, voice, and data collaboration across organizations, enabling everyone to engage in high-definition video, web, and audio conferencing. More details can be found here.

# **Optional Integrations Available**

Certain optional third-party integrations are available as listed below. Please note that no data is shared with any other party until your service is configured to do so. Please consult the administrative guides for more detailed information.

Optional configuration	Other Services	
Google Meet	Video Interop and Conferencing	
Microsoft Teams	Video Interop and Conferencing	

## **Privacy by Design**

HP | Poly implements internal policies and measures based on perceived risks which meet the principles of data protection by design and data protection by default. Such measures consist of minimizing the processing of personal data, anonymizing personal data as soon as possible, transparently documenting the functions, and processing of personal data and providing features which enable the data subject to exercise any rights they may have.

When developing, designing, selecting, and using applications, services and products that are based on the processing of personal data or process personal data to fulfill their task, HP | Poly considers the right to data protection with due regard.

# **Data Processing**

Poly CloudConnect and Poly PrivateConnect do not access any customer's data except as required to enable the features provided by each application. For Poly PrivateConnect, as these systems are deployed in the customer's environment, it is the responsibility of the customer to protect data privacy.

If someone is an individual user and the purchase of these solutions has been made by their employer as the customer, all the privacy information relating to personal data in this white paper is subject to their employer's privacy policies as the controller of such personal data.

Source of Personal Data	Categories of PI Processed	Business Purpose for Processing	Disclosed to the following Service Providers
Administrative user and customer profiles	<ul> <li>Login credentials</li> </ul>	<ul> <li>Authenticate and authorize administrative access to the service</li> </ul>	<ul><li>Pexip</li><li>Your selected third-party service provider</li></ul>
Service registration	<ul><li>Display name</li><li>Email address</li><li>SIP URI</li><li>IP address</li><li>Dial string</li></ul>	<ul> <li>Deliver video service</li> <li>Diagnose technical issues</li> <li>Conduct analytics and analysis to improve the technical performance of the service</li> <li>Respond to customer support requests</li> </ul>	Pexip     Your selected third-party service provider
Call Data Record (CDR)	<ul> <li>Meeting title</li> <li>Meeting participant names</li> <li>SIP URI</li> <li>IP address</li> <li>Dial string</li> <li>Telephone number</li> </ul>	<ul> <li>Confirm appropriate use</li> <li>Permit accurate billing</li> <li>Diagnose technical issues</li> <li>Conduct analytics and analysis to improve the technical performance of the service</li> <li>Respond to customer support requests</li> </ul>	Pexip     Your selected third-party service provider
Google Meet Video Interop calls	<ul><li>Display name</li><li>Endpoint User Agent (UA)</li></ul>	Deliver Google Meet video service	Pexip     Google Cloud Platform     (if Google Meet is     configured)
Microsoft CVI calls	<ul> <li>Display name</li> <li>SIP URI</li> <li>User Principal Name (user@domain)</li> <li>Azure AD profile picture</li> </ul>	Deliver Microsoft CVI calls	Pexip     Azure (if Microsoft Teams is configured)

# **Purpose of Processing**

HP | Poly may process customer data to fulfill support requests and to troubleshoot technical issues as reported by customers to HP | Poly.

How Customer Data is Stored and Protected
The Poly CloudConnect service leverages the bestin-class industry standards for communication
encryption for meetings and end-user devices,
ensuring that communication is secure and kept
private. The service is operated and managed by
Pexip using industry-leading facilities and includes
multiple layers of security. These layers range from

human and personnel security to compliance with relevant standards such as SOC2, SSAE18 and ISO 27001.

Geographic location details related to where data is processed for CloudConnect may be found here.

The Poly PrivateConnect self-hosted platform supports all industry standards for communication encryption for end-user devices, ensuring that all video calls and shared media content is protected even if it crosses the internet. The entire deployment

and all its data, including call status, diagnostic logs, and call history, is completely under the ownership and control of the enterprise, even when deployed in the cloud. Poly PrivateConnect complies with US Federal security requirements.

Additional details are available here.

### **Data Deletion and Retention**

HP | Poly may retain customer data for as long as needed to provide the customer with any HP | Poly services for which they have subscribed and for product improvement purposes. When a customer makes a request for deletion to HP's Chief Privacy and Data Protection Officer form, HP | Poly will delete the requested data within 30 days, unless the data is required to be retained to provide the service to customer. HP | Poly may "anonymize" personal data in lieu of deletion. In cases where anonymization occurs, the process is irreversible and includes but is not limited to searching and sanitizing all customer-specific data (e.g., name, site information, and IP address) with randomly generated alphanumeric characters.

### **Security Incident Response**

The HP Cybersecurity team promptly investigates reported anomalies and suspected security breaches on an enterprise-wide level. Please contact the office directly at informationsecurity@hp.com

The HP Cybersecurity team works proactively with customers, independent security researchers, consultants, industry organizations, and other suppliers to identify possible security issues with HP | Poly products and networks. Relevant security advisories and bulletins can be found here.

### **Subprocessors**

HP | Poly uses certain subprocessors to assist in providing our products and services. A subprocessor is a third-party data processor who, on behalf of HP | Poly, processes customer data. Prior to engaging a subprocessor, HP | Poly executes an agreement with the subprocessor that is in accordance with applicable data protection laws.

The subprocessor list <u>here</u> identifies HP | Poly's authorized subprocessors and includes their name, purpose, location, and website. For questions, please contact <u>HP's Chief Privacy and Data Protection</u> <u>Officer form.</u>

Prior to engagement, suppliers that may process data on behalf of HP | Poly must undergo a privacy and security assessment. The assessment process is designed to identify deficiencies in privacy practices or security gaps and make recommendations for reduction of risk. Suppliers that cannot meet the security requirements are disqualified.

### **Additional Resources**

For additional support documentation for these products, please visit <a href="here">here</a> for Poly PrivateConnect and <a href="here">here</a> for Poly CloudConnect.

### Disclaimer

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