

# **Astro Services Privacy Policy**

## **SCOPE**

This policy covers the privacy practices that Astro, LLC and our subsidiaries and Affiliates ("Astro" or "we") employ when providing support, consulting or other services (the "services") to its customers ("you" or "your"). Astro established this privacy policy in order to clarify that the use of information to which it may be provided access in order to provide services is more limited than the use of information covered by Astro's general privacy policy.

## **CUSTOMER INFORMATION AND SERVICES DATA**

Your Information is information that we may collect from your use of the Astro.com Web sites and your interactions with us off-line. We deal with customer information according to the terms of our general privacy policy. Services Data is data that resides on Astro, customer or third-party systems to which Astro is provided access to perform services (including test, development and production environments that may be accessed to perform Astro consulting and support services). Astro treats services data according to the terms of this policy, and treats services data as confidential in accordance with the terms of your order for services. To illustrate the difference between customer information and services data, when a customer contracts with Astro for services, the customer provides information about itself, including its name, address, billing information, and some employee contact information. Astro's Web sites may also collect some information about the customer and some employees as part of that interaction. All of that information is customer information, and is treated according to Astro's general privacy policy. In contrast, having contracted with Astro for services, the customer then provides Astro with access to its production, development or test environment, which may include personal information about its employees, customers, partners or suppliers (collectively "end users").

## **HOW WE COLLECT AND USE SERVICES DATA**

Below are the conditions under which Astro may access, collect and/or use services data. To Provide Services. Services data may be accessed and used to fulfill the requirements specified in your order for support, consulting or other services. To Maintain and Upgrade a System. Technical staff may require periodic access to services data to monitor system performance, test systems and develop and implement upgrades to systems. Any temporary copies of services data created as a necessary part of this process are only maintained for time periods relevant to those purposes. To Address Performance and Fix Issues. On occasion, Astro may develop new versions, patches, updates, and other fixes to its programs and services (such as security patches addressing newly discovered vulnerabilities). In accordance with the terms of your order for services and/or with notice to you, we may access and/or use a copy of your test, development or production environment, including services data, to test such new versions, patches, updates and fixes and validate that they work in your environment(s). As a Result of Legal Requirements. Astro may be required to provide personally identifiable information to comply with

legally mandated reporting, disclosure or other legal process requirements. Astro may transfer and access services data globally as required for the purposes specified above. If Astro hires subcontractors to assist in providing services, their access to services data will be consistent with the terms of your order for services and this services privacy policy. Astro does not use services data except as stated above or in your order. Astro may process services data, but does not control your information collection or use practices for services data. If you provide any services data to Astro, you are responsible for providing any notices and/or obtaining any consents necessary for Astro to access and use services data as specified in this policy and your order.

## **ACCESS CONTROLS**

Astro's access to services data is based on job role/responsibility. Services data residing in Astro hosted systems is controlled via an access control list (ACL) mechanism, as well as the use of an account management framework. You control access to services data by your end users; end users should direct any requests related to their personal information to you.

## **SECURITY AND BREACH NOTIFICATION**

Astro is committed to the security of your services data, and has in place physical, administrative and technical measures designed to prevent unauthorized access to that information. Astro security policies cover the management of security for both its internal operations as well as the services. Astro is also committed to reducing risks of human error, theft, fraud, and misuse of Astro facilities. Astro's efforts include making personnel aware of security policies and training employees to implement security policies. Astro employees are required to maintain the confidentiality of services data. Employees' obligations include written confidentiality agreements and compliance with company policies concerning protection of confidential information.

## **COMPLIANCE**

Astro has appointed a Chief Privacy Officer. If you believe your services data have been used in a way that is not consistent with this policy, or if you have further questions related to this policy, please contact the Chief Privacy Officer through our inquiry form. Written inquiries may be addressed to Chief Privacy Officer, 376 E. 400 South, Suite 120, Salt Lake City, Utah 84111, United States of America. Last Updated: February 20, 2013