

# EXFO Exchange - Privacy Policy



EXFO Inc., including its affiliates, (collectively “EXFO” or “we”) is committed to protecting the privacy and security of your data and Personal Data. This EXFO Exchange - Privacy Policy (“Privacy Policy”) describes how and why EXFO collects and uses information about you (collectively “you”, “Customer” or “User”) when you visit or otherwise use the EXFO sites, products, and services, in accordance with applicable data protection and privacy laws.

“Personal Data” means any information relating to an identified or identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Please read the following carefully to understand our Personal Data practices. It is important that you read this Privacy Policy, together with any other Privacy Policy we may provide on specific occasions, when we are collecting or processing Personal Data about you, so that you are aware of how and why we are using such information. If you do not agree with this Privacy Policy, do not use EXFO’s Software Services.

By accessing and using the EXFO Exchange mobile app, test unit software, web application or web service distributed or hosted by the EXFO Exchange solution (“hereinafter designated “EXFO Exchange”) you are accepting and agreeing to the privacy practices outlined in this Privacy Policy.

## 1. Context

This Privacy Policy applies to the collection of Personal Data and other information, by EXFO's Exchange when:

- a) User provides data for authentication to EXFO Exchange (mobile application and cloud) and to EXFO test units.
- b) User provides data collected by EXFO test units to EXFO Exchange (mobile application and cloud).
- c) User transfers data from the EXFO Exchange mobile application to his workspace with the EXFO Exchange software service (cloud).

## 2. What we collect

EXFO collects data you provide directly, and through your interactions, use, and experiences with EXFO Exchange. The data we collect depends on your interactions with EXFO Exchange and the choices you make, including your privacy settings and features you use. We also obtain data about you from third parties platforms. Nevertheless, our goal is to collect as little Personal Data as we can in order to guarantee respect for the privacy of Users as well as of the persons concerned by the measures.

The information EXFO may collect, process and use include:

- Identification (name, email, reseller ID, User's contractor ID, title, company name, number of employees)
- Aggregated and anonymous statistics provided by third party platforms (most commonly used devices and operating systems [for example, the percentage of Android 6.x versus Android 7.x], the total number of installs and uninstalls, and the number total active Users)
- Test unit and network data (their use, their status, data concerning the network, IP addresses, geolocation)
- Data models generated by EXFO Exchange (jobs health, network quality, first time right, User activity, results, jobs)

### 3. Why we collect

EXFO needs to keep and process information about Customers for normal business relationship purposes. We will keep and use it to perform a contractual obligation, comply with any legal requirements and pursue the legitimate business interests of EXFO. It will also enable us to proceed with:

- **User authentication:** Identification of a User of EXFO Exchange.
- **Telemetry by third-party platforms:** Some platforms, such as the Google Play Store or the Apple App Store, may collect aggregated and anonymous statistics, which may be governed by their respective privacy policies and terms and conditions.
- **Analysis of network data:** The data collected by test units and the EXFO Exchange application is used to assess the quality of the network, to generate test reports and upload data to EXFO Exchange software services. Users can save the data collected by EXFO test units to transfer the measured data to the EXFO Exchange mobile application through a Bluetooth or Wi-Fi connection.
- **Generation of data models:** Some transmitted data can be transformed into analytic models and reporting models. Those models may be shared among the Users of the same company and with other Users after anonymization. EXFO Exchange provides a workspace to the User and to people belonging to the same company as the User. It allows versioning, reporting and comparison with existing models (local and global models).
- **Support and operation:** Following a User submitted support request for a problem encountered, the EXFO Exchange EXFO may have access to User's data contained within EXFO Exchange in order to solve the problem encountered. Operating EXFO Exchange may also put EXFO in contact with User information.
- **Marketing:** We may occasionally contact Customer to provide information about EXFO Exchange related products and services that may be of interest.

We neither loan nor sell Personal Data to anyone. We will never process Customer Personal Data where these interests are overridden by Customer's own interests and fundamental rights. Some of the above-listed grounds for processing will overlap and there may be several grounds which justify our use of Customer Personal Data. Specifically, the Personal Data we collect from Customers and about Customer is needed to carry out any activity which is compatible with the purpose for which the information was collected, as permitted by applicable law.

### 4. Data Retention

EXFO will only retain Users' Personal Data for as long as necessary to fulfill the purposes we collected it for (authentication purpose, service purpose and for compliance). To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of Personal Data, the purposes for which we process Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In the context of EXFO Exchange, data retention may concern the following systems:

- EXFO test units and the EXFO Exchange mobile application: data storage is managed locally by the User.
- EXFO's cloud environment: the storage of Personal Data within EXFO's cloud environment can be managed by Users, company administrators and EXFO.

Following a deletion request made by a User to his workspace or via the administrator of his company, EXFO will delete the Personal Data within 30 days. Following an end of contract between EXFO and a Customer, EXFO will delete Personal Data of individuals as well as company data that may contain Personal Data within 30 days. Following a support request, EXFO will retain access to data for the duration of the support activity and will delete data that has been used outside of the Exchange cloud to resolve issues within

30 days.

Other contractual data between EXFO and the Customer which may present an administrative interest or come under a legal obligation may be kept according to the applicable legislation.

## 5. Location and transfer of Personal Data

To determine the appropriate storage location for your Personal Data, we consider the potential risk of harm from its unauthorized use or disclosure, the purposes for which data is being processed and the applicable laws.

EXFO test units and EXFO Exchange mobile application store the collected data locally on the device. Data contained within the EXFO Exchange solution are being stored on the cloud. They benefit from the security guarantees provided by third party providers, in particular the encryption of data in transit and at rest.

The support activity, which involves possible access to Personal Data, is carried out from a country ensuring an adequate level of protection with regard to the agreements made with the Customer and the legislation in place.

## 6. User rights

User has the right, exercisable at any time, to:

**The right to access** – You have the right to request to EXFO for copies of your Personal Data. We may charge you a small fee for this service.

**The right to rectification** – You have the right to request that EXFO correct any information you believe is inaccurate. You also have the right to request EXFO to complete the information you believe is incomplete.

**The right to erasure** – You have the right to request that EXFO erase your Personal Data, under certain conditions.

**The right to restrict processing** – You have the right to request that EXFO restrict the processing of your Personal Data, under certain conditions.

**The right to object to processing** – You have the right to object to EXFO's processing of your Personal Data, under certain conditions.

**The right to data portability** – You have the right to request that EXFO transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we will deploy our best efforts to respond to you within a month.

## 7. Cookies

The EXFO Exchange web application uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in;
- Understanding how you use our EXFO Exchange web application;
- Remembering User preferences;
- Tracking errors and performance statistics.

Our EXFO Exchange web application uses the following types of cookies:

- **Functionality** – The EXFO Exchange web application uses these cookies so that we recognize you on our EXFO Exchange web application and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.

You can set your browser not to accept cookies, however, in a few cases, some of our EXFO Exchange web application features may not function as a result.

## 8. How to contact us for more information

If you have any questions about this Privacy Notice or for any purposes relating to personal data protection, please contact the EXFO group through one of these contacts:

Data protection Committee

[data.privacy@exfo.com](mailto:data.privacy@exfo.com)

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## 9. Revision of the Privacy Policy

EXFO reserves the right to periodically review and change this Privacy Policy from time to time. This Privacy Policy was last updated in May 2023.