FUJITSU

Fujitsu Service Desk End User Privacy Policy

1 Description of the Register

This privacy policy describes the way in which the personal data of the end users is collected and processed in Fujitsu Service Desk. The personal data in question is also used to develop Fujitsu's callbot and chatbot solutions as described in more detail in this policy.

2 Data Controller and Contact Information

Fujitsu Finland Oy

Address: Valimotie 16, 00380 Helsinki

EMEIA_DPOffice@ts.fujitsu.com

Detailed information regarding the processing activities described in this policy will be given by the following person:

Janne Kalliomäki

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3 Reasons for Collecting and Processing the Personal Data

- Resolving possible disputes emerging in relation to support cases as well as ensuring the processual rights of the end users, customer and Fujitsu Finland.
- Developing the bot solutions related to the Service Desk.

4 Legal Basis for the Processing of Personal Data

The legal basis for processing of the personal data is the legitimate interest of the controller (i.e. Fujitsu), which in the case of this register is the controller's right to ensure the processual rights of the data subject (i.e. end user), customer and itself in disputes and other controversies. The controller also has a legitimate interest to develop and automate its business and services by utilizing the personal data to an extent that is in balance with the right of privacy of the data subjects.

5 Content of the Personal Data

The following personal data of the data subjects (end users) is processed in the service:

- Name
- Work email address or user account
- Work or private phone number
- Record of a phone call including voice data (only when calling the Service Desk by phone)
- A written transcript of the chat discussion or phone call in text format

Due to the fact that the transcript of the chat discussion or phone call will be stored as such without a separate content filter or anonymization taking place (see section 9 below), Fujitsu strongly recommends that all end users refrain from disclosing their personal information in the chat or over the phone unless there is a very strong reason for doing so.

6 Sources of the Personal Data

The personal data processed in the service is collected automatically during each support case. The personal data mentioned above in section 5 is therefore collected and processed automatically by the call and chat systems as a part of the communications with the data subject.

7 Transfers and Disclosures of the Personal Data

The personal data is transferred to Fujitsu's subcontractors for processing activities and reasons laid out in section 3 above. Fujitsu enters into separate agreements with its subcontractors regarding the processing of the personal data and reviews that the subcontractors abide by these agreements.

By default, the personal data is not disclosed to other data controllers. Fujitsu may have to disclose or present the personal data as a part of an audit or other review undertaken by authorities and targeting Fujitsu.

The personal data is processed and stored in the EU or EEA except in the following exceptional case. Record of a phone call (including voice data) recorded in the Service Desk call service will be processed in real time outside the EU and EEA, but the personal data will not be stored there permanently and all metadata (including the phone number of the data subject) will be deleted before the record is transferred to the subcontractor for processing.

8 Retention Period of the Personal Data

In order to solve disputes and provide due process for all parties of the service, the personal data will be stored for 12 months after its collection.

In order to automate and develop the chat and callbots, the personal data will be stored for 12 months after its collection. Before being used for automation and development purposes, the chat messages and transcripts of the calls will be filtered and the metadata (email address and phone number of the data subject) shall be deleted.

As an exception to the foregoing, records of phone calls (including voice data) will be stored only for 3 months after collection.

9 Data Security

Fujitsu ensures that the personal data is stored and processed only in databases secured by passwords, encryptions and other contemporary data security techniques. The personal data is only accessed by such employees of Fujitsu and its subcontractors that have a reason for accessing the data based on their role and duties. Fujitsu's office spaces and server rooms have been protected against unauthorized access and different kinds of accidents and hazards. The contents of the file register have also been backed up.

While providing the Service Desk and processing the personal data related thereto, Fujitsu utilizes several sanitization techniques in order to delete the metadata related to the individual messages of support cases. Because the contents of such messages are not filtered or anonymized, any information related to a person written in a chat message or spoken during a call by the data subject will be stored as such and processed as personal data. Fujitsu strongly recommends that all end users refrain from disclosing their personal information in the chat or over the phone unless there is a very strong reason for doing so.

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10 Data Subject Rights and Using Them

Based on privacy legislation, the data subject has the following rights in relation to the processing of personal data described in this privacy policy:

- Right to access the personal data concerning themselves,

- Right to request the rectification or erasure of the personal data concerning themselves,

- Right to object to the processing of personal data and thus request its deletion,

- Right to file a complaint about the processing described herein with the authority having jurisdiction, in this case the Finnish Data Protection Ombudsman.

In order to use their legal rights, the data subject should contact the person mentioned in section 2. Fujitsu may request additional information from the data subject themselves in order to process the request or ascertain the identity of the data subject making the request.