



## **Privacy Data Sheet Contact Center**

<b>Introduction</b>	<b>2</b>
<b>Data Protection Roles and Processing Purposes</b>	<b>5</b>
<b>Personal Data processed by Zoom</b>	<b>6</b>
<b>Automated decision making</b>	<b>14</b>
<b>International Data Transfers</b>	<b>14</b>
<b>Government Requests to access Personal Data</b>	<b>15</b>
<b>Data location: Data in transit &amp; Data storage</b>	<b>15</b>
<b>Third-Party Subprocessors</b>	<b>16</b>
<b>Security (Technical &amp; Organizational Measures): Compliance</b>	<b>16</b>

## I. Introduction

This Privacy Data Sheet describes the processing of personal data, which is information from or about an identified or identifiable person (“**Personal Data**”) by the wholly owned subsidiary of Zoom Video Communications (“**Zoom**”) that is the provider of the Zoom Contact Center (“the **Services**” or “Contact Center”). Zoom Contact Center is a contact center software solution available for our enterprise customers and their employees and users (collectively, “**Customers**”, “**you**” or “**your**”). Specifically, the Services include the following:

- **Zoom Contact Center.** The Zoom Contact Center service provides a queuing and routing engine which will enable management of call center logic, a flow editor to allow for easy configuration of call management, and routing of voice or video calls, chat, and messages, including SMS/MMS (“**Engagements**”) to the right experts. It will also use integrations with customer relationship management (“**CRM**”) and workforce management systems to complete the user experience.
  - **SDK and API.** Contact Center can be integrated into the Customer’s existing website and apps via widgets, APIs and SDKs.
  - **Role Management.** The Account Owner can appoint Admins with varying levels of permissions to assist in the management of the account. Access to Contact Center features can be granted to Zoom Customer’s **Agents** and their **Supervisors (“Licensed Users”)** by means of either a named user license or a concurrent use license. Agents and Supervisors respond to Engagements from the customers of the Zoom Customer (“**End Consumers**”). To ensure that the Engagements from End Consumers are routed to the correct Agent, the dashboard allows Customer Admins to assign skills to specific Agents, for example, language proficiency or area of expertise.
  - **Flow Design.** The tool allows Admins to visually set up logic as to how End Consumers will be routed through the Contact Center based on conditions set by the Customer, for example by providing a menu of options to the End Consumer and based on the skills and availability of Agents.
  - **Queue Management.** End Consumers can join a queue via chat or video function embedded on the Customer’s website or via a phone call. A number of features are available to manage queues. For example, when an End Consumer has been on hold for a given time, it is possible to route them

to an overflow option or to end the call. Agents can also set their availability status to determine whether or not they can receive Engagements and of which type. Settings are also available to determine how many simultaneous chats can be handled, how much time Agents should be given between Engagements and how Engagements should be distributed between Agents, for example based on skill proficiency or availability. End Consumers can be informed of the estimated waiting time, and Supervisors can be assigned to a particular queue.

- **Asset Library.** Images, videos and audio files can be uploaded to customize the End Consumer experience. These will then be available for use by the Customer throughout Contact Center, for example as hold music, the Customer's company logo for display while the End Consumer is in a waiting room, and scripts for Agents to follow.
- **Address Book and Third Party CRM Integrations.** Contact Center will integrate with a number of third party CRM platforms [including Salesforce, Zendesk, ServiceNow and MS Dynamics] allowing Agents to see the contact details and other profile details of End Consumers as inputted by the Customer. As an alternative, Customers can use Zoom's own Address Book to store End Consumer Contact Details and Contact Center journey history.
- **Supervisor Interactions.** Subject to local laws including any required notifications, Customers may exercise the option to allow Supervisors to listen in on Engagements to ensure quality standards are being met, and to whisper coach Agents on how to interact with the End Consumer. If needed, Supervisors can take over the Engagement with the End Consumer.
- **Dispositions.** Customers can determine how they wish an Agent to end a Engagement with an End Consumer and record how the Engagement was disposed of. For example, this may include a set list of options for how the End Consumer's issue was resolved which can be used to ensure consistency between Agents and produce statistics on the resolutions provided.
- **Campaigns.** Customers can set up features and flows within Contact Center to be active for specific marketing campaigns they may run.

- **Deletion Policy.** Customers can configure Contact Center to delete certain content data according to their own deletion policies. For example, the Customer can set a soft and hard deletion period for voicemails.
- **Logs and Analytics.** The dashboard provides a range of logs and analytics on how the Contact Center is being used by End Consumers, Agents, and Supervisors. For example this includes live stats on waiting times and agent availability as well as aggregated statistics on average talk and wait times, and call abandonment performance. Admins can also view and export logs about how the Service has been used.
- **Cloud Storage.** Each Contact Center license includes cloud storage capacity for voice and video call recordings, voicemails, and media asset library. An email alert is sent to Admins when usage is at 80% of the subscribed storage limit. If Customers do not elect to purchase additional cloud storage, the Customer's oldest recordings will be deleted on a first-in-first-out (FIFO) basis. Voicemails and media assets are not subject to automatic deletion.
- **Internal Calling between Zoom Contact Center and Zoom Phone.** Licensed Users can transfer voice calls to a Zoom Phone user on the same account by entering their phone number, extension number, or, if enabled by the Admin, the Zoom Phone user's contact name. If enabled by the Admin, Licensed Users can also view the Zoom Phone user's avatar and presence information.
- **Channel Upgrades.** Agents are able to upgrade End Consumer Engagements to a more suitable channel, for example, from voice to video, SMS to voice, chat to voice, etc. When upgrading to video, the Agent shares a link with the End Consumer via chat, email, or SMS to enable the End Consumer to join a video call.
- **Social Media Messaging.** The messaging channel enables Customers to integrate Contact Center with third-party social media messaging platforms such as Facebook, Whatsapp, and Instagram. These integrations allow Customers to exchange messages with End Users via social media messaging platforms.

- **Other features.** Zoom is working to test and provide additional functionality in Contact Center which means that some features may not yet be available to all Customers.

Zoom Contact Center software is made available to Customers via servers located in the United States. Account data, settings, chat transcripts, reporting and analytics, and uploaded media assets are stored in the United States. Customers can select regions where voice and video cloud recordings and voicemails are stored.

Since Zoom Contact Center is only available to enterprise customers. This Privacy Data Sheet does not apply to Zoom Phone or Zoom Meetings, Webinar and Chat. This Privacy Data Sheet also does not apply to Zoom for Government, Zoom Events or Zoom Apps. For further detailed information about our Services, please visit the “Solutions” section of our [website](#).

This Privacy Data Sheet specifies our existing [Privacy Statement](#) in describing the Personal Data Zoom processes to provide the Services to our Customers, and data protection matters such as international data transfers and data location. It does not create additional rights or remedies and should not be construed as a binding agreement.

Please contact us at [privacy@zoom.us](mailto:privacy@zoom.us) with any questions or comments.

## ***II. Data Protection Roles and Processing Purposes***

***Zoom is the data processor*** (as defined in the European Union’s General Data Protection Regulation or “GDPR”) for all Personal Data processed in delivery of the Services unless explicitly stated as an exception [below](#).

Zoom Customers control the processing of that Personal Data and related Zoom account settings. Zoom Customers can access the Personal Data described below and use it subject to their own policies and procedures.

### **Why Zoom Processes Personal Data**

Zoom processes Personal Data as a processor only for the following purposes:

- To provide and update the Zoom Services as licensed, configured, and used by our Customers and their users, including through Customer's use of Zoom settings, administrator controls, or other Service functionality;
- To secure and protect the Zoom Services;

- To resolve issues, bugs, and errors;
- To provide Customers with support upon request, including applying knowledge gained from individual customer support requests to benefit all Zoom Customers, but only to the extent such knowledge is anonymized; and
- To perform instructions explicitly authorized by the Zoom Customer in a written document.

Zoom processes Personal Data obtained through delivery of the Services as controller (as defined in the GDPR) **only** for the following exhaustive list of purposes:

- To manage Customer business accounts, for example, billing, marketing communication with procurement or sales officials), and related Customer correspondence (e.g., communication about necessary updates);
- To comply with and resolve legal obligations, including responding to Data Subject Requests for Personal Data processed by Zoom as controller (for example, website data), fiscal requirements, agreements and disputes; and
- For abuse detection, prevention and protection (such as automatic scanning for matches with identifiers of known Child Sexual Abuse Material (“CSAM”), virus scanning and scanning to detect violations of terms of service (such as copyright infringement, fraud, SPAM, and actions not permitted under [Zoom’s Community Standards](#) (also known as an acceptable use policy).

Zoom processes pseudonymised Personal Data or aggregated data as a controller for:

- improving and optimizing the performance and core functionalities of accessibility, privacy, security, and the IT infrastructure efficiency of the Services, including zoom.us, explore.zoom.us, and support.zoom.us;
- internal reporting, financial reporting, revenue planning, capacity planning, and forecast modeling (including product strategy); and
- receiving and using feedback for Zoom’s overall service improvement.

Whether acting as a processor or controller, Zoom processes Personal Data only where adequate, relevant, and where such processing is not excessive in relation to the specified purposes.

### **III. Personal Data processed by Zoom**

The Services provide Customers with a unified end-to-end customer contact center helping Customers to support their inbound, customer-driven requests and integrate third party customer relationship management systems, workforce management systems, and workforce optimization systems.

An overview including all details of Personal Data Zoom processes on your behalf when delivering the Services to you is available in our [Privacy Statement](#).

When you use the Services through a Customer account holder (“**Account Owner**”) (such as your employer), that Account Owner controls the processing of your Personal Data. Your Account Owner can access the Personal Data described in this document and use it subject to their own privacy statement and policies. In particular, Account Owners and Admins can enable settings to allow Supervisors to listen in on Engagements assigned to Agents.

If you have questions about how or why your Personal Data is collected, the legal basis for processing, or requests concerning your Personal Data, please refer to your Account Owner's privacy statement and policies. Questions and queries should be addressed to your Account Owner or IT administrator.

Zoom Contact Center groups the Personal Data it processes into the following categories: [Customer Content](#), [Diagnostic Data](#), [Account Data \(Licensed Users\)](#), [Account Owner Data](#), and [Support Data](#), [Location Data](#), and [Integration Data](#).

#### **Customer Content Data**

This is data provided by the Customer through use of the Service including all data the Customer chooses to record or share during a call, including call communication content, cloud recordings, call participant information, stored messaging channel information, stored chat information, stored call history, and address book information.

**Video/Voice Communication Content.** This will include:

- Video and voice
- Live transcription/closed captioning and live translations

**Chat Messages.** This will include:

- Chat messages and content between Agents, End Consumers, and Supervisors.

**Customer Initiated cloud recordings.** This will include the following recordings if such recording is permitted by the Customer's administrator controls:

- Video / Voice call recording, and
- Video / Voice call recording text file (transcript).

**Engagement Participant Information.** This will include:

- Phone number and associated information (such as UUID and/or country code) for the caller and the callee(s),
- End Consumer name (if available) or associated with a phone number,
- Licensed User Name,
- Source and destination phone numbers, including use of extensions,
- Interactive Voice Response (IVR) selections,
- Time elapsed since the engagement started, and
- End Consumer name and contact details (i.e. email addresses), including for callback purposes; and any data requested by Customer to be provided in conjunction with registration.

**Stored Messaging Channel (including SMS/MMS) Information.** This is data at rest (i.e., in storage) and will include:

- Content of messages,
- Files exchanged,
- Images exchanged,
- Videos exchanged,
- Messaging channel title, and
- Name of recipient.

**Stored Chat Information.** This is data at rest (i.e., in storage) and will include:

- Chat messages,
- Files exchanged via Chat,
- Images exchanged via Chat,
- Videos exchanged via Chat, and
- Chat channel title.

**Engagement Log.** This is data at rest (i.e., in storage) and will include:

- End Consumer's phone number, including use of extensions, and associated information (such country code),
- Callback number (if provided by the End Consumer),
- Engagement ID,
- Name (if available) associated with a phone number,
- Channel (either voice, video, chat, or messaging, including SMS/MMS),
- Date of the Engagement,
- Time of Engagement,



- Duration of Engagement,
- Engagement deactivation due to lack of activity and reactivation upon resumed activity,
- Voice and video recordings, and
- Number of voicemails, if any, left by the End Consumer.

For more details about Zoom Contact Center Engagement Logs, please review this [Help Article](#).

**Kiosk Engagement Information.** When an End Consumer is involved in an engagement utilizing a Customer's kiosk some information about that engagement and the kiosk may be collected. This includes kiosk device make and model, kiosk location, and engagement length.

**Address book Information.** This includes contact information made available through Customer controlled integrations (e.g. Outlook or Salesforce) or inputted into Zoom's own Address Book feature. End Consumer's: Name, email address, display name, phone number, location, account number, queue priority attribute, company and role.

**Calendar Information.** This includes meeting schedules made available through Customer controlled integrations (e.g. Outlook, Google).

**Agent Notes.** This includes text typed into an open textbox by the Customer's Agent.

**Report Subscription.** Lists of email addresses entered by Admin to send reports.

**Global Variables.** Data variables defined by the Customer based on what the Customer would like collected from End Consumers during their engagement with Zoom Contact Center. Customers with Zoom Virtual Agent on the same account are able to sync global variables between Contact Center and Virtual Agent.

**Blocked List.** Account Owners and Admins can specify phone numbers and phone number ranges that are blocked for incoming and outgoing calls and SMS.

**Voicemail Assignment.** Supervisors can assign incoming voicemails to agents or supervisors. Assignees can listen to voicemail messages and take action as appropriate.

## Diagnostic Data

Diagnostic Data includes all data automatically generated or collected by Zoom about the use of Zoom Contact Center. **Diagnostic Data does not include an End Consumer's name, email address, or Customer Content Data.** Diagnostic Data is made up of these categories of data, [Voicemail Metadata](#), [Voice Recording Metadata](#), [SMS/MMS Metadata](#), [Social Media Messaging Metadata](#), [Web Chat Metadata](#), and [In-Video Chat Metadata](#), [Telemetry Data](#), and [Other Service Generated Data](#).

### **Voice/Video Call Metadata**

Call Metadata are metrics about Service usage, including when and how calls were conducted and quality of service. This category includes:

- System generated identifiers, including Call ID, UUID of Agent and Supervisor, Licensed User ID and engagement ID,
- Date and time of call,
- Duration of call,
- Source and destination phone numbers,
- Type of call (inbound, outbound, toll-free),
- Call cost (based on per-minute rate),
- Version of the Zoom software running on a Licensed User's device ("client"),
- Operating system and device information, including OS version, connection type (Wi-Fi, etc.), device make and device model),
- IP address (where applicable),
- ISP information (where applicable),
- Call result (busy, no answer, connected, missed, rejected, blocked, error, redirected),
- Billing information, including account number, cost center, and department, if any
- PSTN carrier information,
- Call queue information, if any
- Events (including: action taken, event type and subtype, in-app event location, timestamp, client UUID), such as
  - engagement recording start and stop events,
  - engagement transcription start and stop events,
  - call transfer events, including transfer to voicemail and agent skills for skills-based transfers,
  - engagement hold and unhold events,
  - engagement channel upgrades (e.g., voice to video, chat to video, SMS to voice, chat to voice, etc.), and

- engagement barge, monitor, whisper, and takeover,
- Engagement session Information, including frequency, average and actual duration, quantity, quality, network activity, and network connectivity,
- Number of engagements,
- Number of screen-sharing and non screen-sharing sessions,
- Number of participants,
- Engagement host information,
- Host Name,
- Join Method, and
- Performance, troubleshooting and diagnostics information.

### **SMS/MMS Metadata**

- System generated identifiers, including conversation ID, message ID, and session ID,
- Name and email, if available in association with a phone number,
- Media file name, type, and size (when sending media),
- Source and destination phone numbers, including extensions,
- Message carrier identification,
- Message creation and expiration times,
- Read status, and
- Billing information, including account number, plan type, payment type, cost center, and department, if any.

### **Social Media Messaging Metadata**

- System generated identifiers, such as user ID, conversation ID, page ID, message ID, and session ID, including identifiers generated by third-party social media platforms,
- Name and email, if available,
- Phone number, if available,
- Date and time of messages.

### **Web/In-Video/Waiting Room Chat Metadata**

- System generated identifiers, including session ID, engagement ID, Customer ID, and agent ID,
- Media file name, type, and size (when sending media),
- Chat event status (e.g., chat started, chat ended, message sent, and message received), and
- Licensed User chat status (active or away),
- Engagement start page URL and title,
- IP address,

- Browser,
- Operating system,
- Device and device screen size.

## Telemetry Data

Telemetry Data is information sent to Zoom from the Zoom client software running on an Licensed User's device about how Zoom is used or performing (e.g., product usage and system configuration). Zoom collects Telemetry Data following a similar structure: a few fields describe the client and the operating system, the type and subtype of the event, the location in the app where the event occurred, a timestamp, and some pseudonymous identifiers, including a UUID, userID and call\_id. **Telemetry Data does not include Customer Content, or information about other Licensed Users, or other Licensed User-supplied values such as profile names.** Zoom Contact Center does not currently collect Telemetry Data, but may in the future.

## Other Service Generated Data

Diagnostic Data that is Other Service Generated Data is information that Zoom uses to provide a service requested by the Licensed User or Customer, such as providing push notifications.

Other Service Generated Data includes a Zoom persistent unique identifier that Zoom's Trust and Safety Team combines with other data elements including IP address, data center, PC name, microphone, speaker, domain, hard disc ID, network type, operating system type and version, and client version. Zoom uses this data to identify and block bad actors that threaten the security and integrity of Zoom Services. This data is accessible only by Zoom employees with a need to know and subject to appropriate technical and organizational measures.

## Account Data (Licensed User)

This is information associated with Licensed Users who are members of a Zoom Contact Center account. Depending on how the account administrator has configured the Zoom Contact Center, this information will include:

- Zoom unique Licensed User ID,
- License type (named user license or concurrent use license),
- Login, logout, and session timeout activity,

- Agent status (not ready, ready, occupied, and offline) and sub-status (e.g., holding, wrapping up, transferring in, and transferring out)
- Agent skills,
- Profile picture (optional),
- Display name, and
- Customer authentication data unless Single Sign On (SSO) is used,
- Phone number and extension,
- Time Zone, and
- Language.

### **Account Owner Business Data**

Account Owner Business Data is made up of two categories of data: [Billing and Sales Data](#) and [Know Your Customer Data](#).

#### **Billing and Sales Data**

This is information associated with the individual(s) who are the billing and or sales contact for a Zoom Contact Center account. This will include:

- Name,
- Address,
- Phone number,
- Email address,
- Billing and payment information, and
- Data related to the Customer's account, such as subscription plan, license use, and selected controls.

Zoom uses this information for very limited purposes including to:

- Create a Zoom account,
- Provide Zoom services,
- Respond to requests for support,
- Provide announcements related to software updates, upgrades, and system enhancements, and
- Send marketing communications, where permitted.

#### **Know Your Customer Data**

In order to provision numbers for use with Contact Center, Zoom may need to collect additional information from the Account Owner based on your jurisdiction in order to satisfy local laws and regulations. This may include, when applicable:

- Government ID,
- Proof of business registration, and
- Proof of business address.

### **Support Data**

Support data is information provided by a Customer to Zoom in connection with support activities such as support bot messages, chats, and phone calls (including recordings of those calls) and Service support tickets. The business contacts for a Zoom Contact Center account or the account administrators can submit online support requests. The request can include attachments, such as screenshots. Such screenshots may include Customer Content Data or Diagnostic Data.

As controller, Zoom Customers instruct Zoom to process Support Data to provide the requested support, which includes applying knowledge gained from individual customer support requests to benefit all Zoom customers but only to the extent such knowledge is anonymized.

### **Location Data**

Location Data is made up of [Approximate Location](#).

### **Approximate Location**

We collect your approximate location automatically through the use of our Services. This is information associated with the Licensed User's nearest city or town. This is used in order to:

- Connect you to the nearest data center,
- Comply with applicable privacy and other laws – for example, so we can provide you with the right notices for your area,
- Suggest choices such as language preferences,
- Monitor performance of our data centers and networks, and
- Route support requests.

### **Integration Data**

If you have enabled integration of Zoom Contact Center with a supported third-party platform, including customer relationship management (CRM) platforms, you may launch Zoom Contact Center directly within the platform instance, meaning you can initiate and

record Zoom calls without leaving the third-party platform. Such integration will enable a bi-directional data sync between Zoom and the platform. For example, if you receive a call on Zoom Contact Center through Salesforce, a new lead/contact entry can automatically be generated in Salesforce; whereas if you reach out to an existing lead/contact, the associated record page will be retrieved for you to work on. Additionally, Account Owners and Admins can enable call event and media streaming integrations with third-party applications, for example workforce management and workforce optimization platforms. Upon Customers initiating such integrations, Zoom Contact Center will stream call event data and call content to supported third-party applications.

### **Operation Logs**

Operation logs for Zoom Contact Center allow Account Owners and Admins to view changes made by Admins to contact center settings and features. This includes changes to Account and Group settings, changes in role and license assignments for Licensed Users, and changes to subscriptions under Billing. For example, you can use operation logs to view instances where Admins added or edited a Contact Center Customer's Licensed User.

For more details about Zoom Contact Center Operation Logs, please review this [Help Article](#).

## ***IV. Automated decision making***

The personal data processed by the Services do not produce decisions that would result in legal or other significant effects impacting the rights of data subjects based solely on automated processing.

Zoom's systems do however have anti-fraud measures in place to block suspicious calls based on automated processing, as do our underlying service providers. In addition, our anti-fraud systems detect possible patterns that can suggest that there may be fraudulent conduct with regards to your account, in which case the system will warn you in order for you to verify recent activity.

## ***V. International Data Transfers***

Zoom strives to transfer Personal Data per applicable data protection law. For example, where we transfer Personal Data outside the European Economic Area ("EEA"),

Switzerland, or the UK, we do so based on the appropriate [EU Standard Contractual Clauses](#) (“SCCs”) with additional safeguards in place, as appropriate, so that the Personal Data is protected to the required standard.

### **The SCCs, Data Transfer Impact Assessments, and Schrems II**

On 16 July 2020, the Court of Justice of the European Union (“CJEU”) ruled in the case of the Irish Data Protection Commissioner v. Facebook Ireland and Maximilian Schrems (Case C-311/18) (“Schrems II”). The ruling invalidated the EU-US Privacy Shield Framework as a lawful means to transfer Personal Data from the EEA to the US.

More importantly, however, the CJEU affirmed that the SCCs remain a valid Personal Data transfer mechanism – subject to a new requirement. To rely on the SCCs following Schrems II, data exporters must conduct a Data Transfer Impact Assessment (“DTIA”) to assess the risks of individual transfers and adopt any supplementary measures needed to bring the data protection level to the EU standard of essential equivalence.

We’ve prepared this [template DTIA](#) to help our Customers perform a risk assessment pursuant to the Schrems II decision. Please note that the DTIA does not form a part of any Zoom contractual document or agreement. It is provided solely as a source of information and reflects Zoom's understanding of complex legal issues. You should make your own determinations and, if necessary, seek independent legal advice.

Zoom also shares Personal Data we collect as a data processor with subprocessors, including members of the Zoom Group. You can find further information about these recipients in [Section VIII. Subprocessors](#) in this Privacy Data Sheet.

## ***VI. Government Requests to access Personal Data***

Zoom is committed to protect our Customers, Licensed Users, and End Consumers’ privacy and only produces Customer, Licensed User, and End Consumer data to governments in response to valid and lawful requests, in accordance with our [Government Requests Guide](#) and relevant legal policies. Please see this [blog post](#) for further information on how we respond to government requests. To access our latest Transparency Report, visit our [Trust Center](#) and select the Government Requests Transparency Report icon.



## **VII. Data location: Data in transit & Data storage**

### **Data in transit.**

Zoom transmits customer data through its global network of collocated data centers and public cloud data centers (including Amazon Web Services (AWS) data centers). The Services are designed to work so that any information entering the Zoom ecosystem is routed through the data center nearest the user sending or receiving the data.

### **Data storage.**

Customer Content, Account Data, and Diagnostic Data are stored in the US by default. Customers may choose the storage location for some of their Customer Content for their account. You can find details in [this Help Article](#).

Keep in mind this storage selection location does NOT include Account Data and Diagnostic Data, which will still be stored in the US. Only Account Owners, account administrators, or those with the customer account profile privilege will be able to change this setting. Customer data is stored at rest using 256-bit AES GCM encryption, with keys managed by a cloud-based key management system.

## **VIII. Subprocessors**

When Zoom hires a supplier to process Personal Data in order to provide some aspect of the Services to you, these suppliers are identified as a “**Subprocessor**” (in accordance with GDPR terminology), and are disclosed on Zoom’s [Subprocessor webpage](#).

### **Zoom’s process for contracting with third-party subprocessors**

Zoom requires its Subprocessors to process your Personal Data in accordance with the applicable data protection law and to satisfy equivalent obligations as those required of Zoom as a data processor and outlined in Zoom's Data Processing Agreement (“[DPA](#)”), including but not limited to the requirements to:

- process Personal Data following data controller's (i.e., Customer's) documented instructions (as communicated in writing to the relevant Subprocessor by Zoom);
- in connection with the subprocessing activities, use only personnel who are reliable and subject to a contractually binding obligation to observe data privacy and security, to the extent applicable, under applicable data protection laws;
- promptly inform Zoom about any security breach; and

- cooperate with Zoom to address requests from data controllers, data subjects, or data protection authorities, as applicable.

### **Zoom Group Subprocessors**

Zoom Video Communications, Inc. owns and controls several global affiliates that form the Zoom Group. All parties of the Zoom Group have entered the appropriate data transfer agreement that sets out the data protection requirements and incorporates the appropriate [EU Standard Contractual Clauses](#) (“SCCs”). Zoom's [subprocessor page](#) lists the Zoom Group affiliates.

## ***IX. Security (Technical & Organizational Measures): Compliance***

Zoom implements and uses appropriate technical and organizational measures to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Data.

Please see our [Trust Center's Security Pages](#) for more information on how Zoom works to secure your data and protect your privacy.