

Services Data Privacy Statement



Address	GT.net 500 – 455 Granville Street Vancouver, BC Canada, V6C 1T1	Version	1.0
		Last Modified	December 28, 2017

Scope

This Privacy Statement covers GT's privacy practices with respect to customer data that resides on GT servers in order to provide services, such as managed hosting, to its customers.

GT has established this Privacy Statement in order to clarify that the use of information which may be under its control in order to provide services, is more limited than the use of information covered by GT's general [Privacy Policy](#).

Customer Information and Services Data

Customer Information is information that we may collect from your use of GT's websites and your interactions with us offline. We deal with customer information according to the terms of our general [Privacy Policy](#).

Services Data is data that resides on GT servers in the context of managed hosting services, as well as customer or third-party systems to which GT is provided access to perform services (including Cloud environments as well as test, development and production environments that may be accessed to perform GT support services). GT treats Services Data according to the terms of this Privacy Statement, and always treats Services Data as confidential.

To illustrate the difference between customer information and Services Data, when a customer contracts with GT for managed hosting services, the customer may provide non-business information about him or herself, including name, address, phone numbers and billing information. GT may also collect other information about the customer or some employees of the customer, for example through its websites, as part of that interaction. All of that information is customer information, and is treated according to GT's Privacy Policy. In contrast, since service data resides on GT's servers, GT has custody of the customer's data, which may include personal information about the customer's employees, customers, partners or suppliers (collectively "end users").

How GT Collects and Uses Services Data

Below are the conditions under which GT may access, collect and/or use Services Data.

To Provide Services and to Fix Issues

Services data may be accessed and used to provide services under your order including support or Cloud services, and to confirm your compliance with GT's Acceptable Use Policy in the context of an investigation GT may engage in testing and monitoring system use and performance, applying new product or system versions, patches, updates and upgrades; and resolving bugs and other issues you have reported to GT. Any copies of Services Data created for these purposes are only maintained for time periods relevant to those purposes.

As a Result of Legal Requirements

GT may be required to retain or provide access to Services Data to comply with legally mandated reporting, disclosure or other legal process requirements.

GT may transfer and access Services Data globally as required for the purposes specified above. If GT hires subcontractors or service providers to assist in providing services, their access to Services Data will be consistent with the terms of your order for services and this Privacy Statement. GT is responsible for ensuring any third parties with custody of or access to Services Data act in compliance with the terms of this statement.

GT does not use Services Data except as stated above. GT may process Services Data, but does not control your collection or use practices for Services Data. You are responsible for providing any notices and/or obtaining any consents necessary for GT to access, use, retain and transfer Services Data as specified in this statement or as required to provide you with requested GT products or services. GT will never communicate directly with your end users about their personal information unless directed by you.

Access Controls

Services data residing in GT-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. Your end users should direct any requests related to access to their personal information to you.

Security and Breach Notification

GT 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. GT security policies cover the management of security for both its internal operations as well as the services it provides. These policies govern all areas of security applicable to services provided by GT and apply to all GT employees.

GT is also committed to reducing risks of human error, theft, fraud, and misuse of GT's servers. GT's efforts include requiring customers to comply with an Acceptable Use Policy, and making personnel aware of security policies. GT employees are required to maintain the confidentiality of Services Data. Employees' obligations include signing a written confidentiality agreements, and regular training on information protection and avoiding data security risks. Even with risks being appropriately reduced and managed, all organizations face some element of security risk that must be tolerated or transferred. GT thus has a strong cyber and privacy insurance policy in place that also benefits you by covering third party losses.

GT promptly evaluates and responds to incidents that create suspicions of unauthorized handling of Services Data. Depending on the nature of the activity, escalation paths and response teams are defined to address any such incidents. If GT determines that your Services Data may have been misappropriated or otherwise wrongly acquired by a third party, GT will promptly commence an investigation and report the incident to you in accordance with GT's Data Breach Response Procedure.

Upon the customer's written request or upon termination of the relationship between GT and the customer, Services Data will be securely destroyed by GT. However, residual copies of such data may temporarily remain in back-ups.

EU GDPR:

GT customers who collect the personal data of EU residents and thus act as data controllers under the General Data Protection Regulation (EU 2016/679), can be rest assured that GT has taken the necessary steps to comply with the rules for data processors outlined in Article 28 of the GDPR.

Compliance and Contact

Note that in the event of a conflict between this Privacy Statement and the [GT Hosting Services Terms and Conditions](#), the Terms and Conditions shall prevail.

If you have any concerns regarding our compliance with this Privacy Statement or the protection of Services Data, please contact GT's Privacy Officer. We will attempt to resolve complaints and disputes in a timely manner.

Privacy Officer
Gossamer Threads
5th Floor, 455 Granville St
Vancouver, BC V6C 1T1
Canada

Phone: 604-687-5804
Email: privacyofficer@gt.net

Hours: Monday to Friday
9am to 5pm Pacific Time