

Forcepoint License Center and license processing system for the Forcepoint NGFW solution

Management of Personal Data

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General

Document Purpose

This document is designed to answer the question: “What personal data is stored in the Forcepoint License Center (License Center) and the license processing system for the Forcepoint Next Generation Firewall (Forcepoint NGFW) solution?” It is primarily intended for those involved in the procurement and privacy assessment of the Forcepoint NGFW products.

General Data Protection Regulation (GDPR)

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) was adopted on April 27, 2016 and came into effect on May 25, 2018. GDPR, which replaced the Data Protection Directive 95/46/EC, is a significant source for the privacy principles that guide Forcepoint’s privacy policies and processes, both internally and externally. Full details of the GDPR can be found in various sources, including https://ec.europa.eu/info/law/law-topic/data-protection/reform_en

The operation of the License Center and the license processing system for the Forcepoint NGFW solution is designed to comply with GDPR principles. Consistent with GDPR’s principles, Forcepoint’s customers are considered to be the sole data controller. Forcepoint is the data controller and the data processor with respect to customer data stored in the License Center and the license processing system for the Forcepoint NGFW solution.

Personal Data

This document adheres to the definition of personal data as defined in article 4.1 of the General Data Protection Regulation, which defines ‘personal data’ as any information relating to an identified or identifiable natural person (‘Data subject’); an identifiable natural person is one 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.

Safeguarding Personal Data

Forcepoint uses industry-standard techniques to protect data held within the License Center and the license processing system for the Forcepoint NGFW solution, including personal data. This approach to data security ensures that the high-risk data is unintelligible to any person who is not authorised to access it.



Identity & Policy

Data Set	What Data is Used?	Purpose	Is Anonymization Possible?	Storage, Flow & Protection	Retention
User account data	<p>Customers can optionally create in the License Center one or more customer-specific user accounts to make it easier to manage licenses for the Forcepoint NGFW solution in the License Center.</p> <p>Customers enter the data for the registered user account in the License Center to manage their licenses.</p> <p>The user accounts in the License Center are only used for administrative purposes to manage product licenses. The user accounts are not accounts for the users or the administrators of the products.</p> <p>For details about personal data for the registered user account, see Table 1: Personal Data Attributes for User Account Data in Appendix A.</p> <p>For details about personal data collected when managing licenses, see Table 2: Personal Data Attributes for User Data in Appendix A.</p>	To resolve technical or business level issues for the customers.	No.	User accounts are created in the License Center and stored and maintained in the US by Forcepoint.	<p>Retained indefinitely.</p> <p>The data is deleted manually at the customer's request.</p>
Customer data	<p>Customer data is stored in the license processing system. License data is tied to the customer data.</p> <p>For details, see Table 3: Personal Data Attributes for Customer Data in Appendix A.</p>	To resolve technical or business level issues for the customers.	No.	Customer data is stored and maintained in the US by Forcepoint.	<p>Retained indefinitely.</p> <p>The data is deleted manually at the customer's request.</p>
Request logs	<p>Attempts to log on to the License Center are logged.</p> <p>For details, see Table 4: Personal Data Attributes for Attempts to Access License Center in Appendix A.</p>	To prevent phishing attempts for license identifiers and user account information.	No.	The request logs are stored and maintained in the US by Forcepoint.	<p>Retained indefinitely.</p> <p>The data is deleted manually at the customer's request.</p>



Web logs for License Center and license processing system	<p>Information about customer actions in the License Center and in the license processing system are automatically logged.</p> <p>For details, see Table 5: Personal Data Attributes for License Center Web Logs and Table 6: Personal Data Attributes for License Processing System Web Logs in Appendix A.</p>	<p>To resolve technical or business level issues for the customers.</p>	<p>No.</p>	<p>The web logs are stored and maintained in the US by Forcepoint.</p>	<p>The logs are stored for one year.</p>
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Appendix A

TERMINOLOGY

Term	Explanation
Forcepoint License Center	Forcepoint website for managing licenses for the Forcepoint NGFW solution.
Forcepoint Next Generation Firewall solution (Forcepoint NGFW solution)	The Forcepoint NGFW solution consists of NGFW Engines that inspect traffic and Forcepoint NGFW Security Management Center (SMC) components. SMC is the management component of the Forcepoint NGFW solution. The SMC manages and controls the other components in the system.

PERSONAL DATA ATTRIBUTES

Table 1: Data Attributes for User Account Data

Attribute
User name*
Email address*
Company name*
Company address
Zip code
City
Country
State
Reseller name
First name (<i>authorized customer contact</i>)
Last name (<i>authorized customer contact</i>)
Email address (<i>authorized customer contact</i>)
Telephone number (<i>authorized customer contact</i>)
Password*: a hash of the password is stored (<i>a password is automatically generated when the customer registers an account; the customer can change the password</i>)
Last login time and date
Last password change time
User registration date

* indicates required information



Table 2: Data Attributes for User Data

Attribute
Email address*
Company
Company address
Zip code
City
Country
State
Reseller
First name (<i>authorized customer contact</i>)
Last name (<i>authorized customer contact</i>)
Email address (<i>authorized customer contact</i>)
Telephone number (<i>authorized customer contact</i>)

* indicates required information

Table 3: Data Attributes for Customer Data

Attribute
Company*
Company address*
Zip code*
City*
Country*
State*
Reseller name
First name* (<i>authorized customer contact</i>)
Last name* (<i>authorized customer contact</i>)
Email address* (<i>authorized customer contact</i>)
Telephone number* (<i>authorized customer contact</i>)

* indicates required information



Table 4: Data Attributes for Attempts to Access License Center

Attribute
IP address
User name

Table 5: Data Attributes for License Center Web Logs

Attribute
IP address
User name (<i>when registering</i>)
Country (<i>when registering</i>)
City (<i>when registering</i>)

Table 6: Data Attributes for License Processing System Web Logs

Attribute
IP address

