braze | GDPR FAQs

These FAQs are for informational purposes only and not intended to be legal advice. Customers should seek their own legal advice with respect to the use of Braze Services.

What is the GDPR?

The EU General Data Protection Regulation (GDPR) is EU legislation that regulates the use of personal data by organizations with the fundamental aim of protecting personal data of EU citizens. Following the UK's withdrawal from the EU, the UK has implemented and incorporated the GDPR into national law known as the "UK GDPR". Any reference in these FAQs to GDPR shall also mean the UK GDPR.

How does the GDPR apply to the Braze Services?

The GDPR applies to any organization that processes personal data of EU or UK individuals. In the context of Braze providing the Braze Services to its customers, the GDPR applies to both the Braze customer, as the organization determining how personal data is to be processed (a "Controller"), and to Braze as a service provider processing on behalf of the customer's instructions (a "Processor").

Can a Braze customer use the Braze Services to assist with its own GDPR compliance?

Yes, a Braze customer can use the Braze Services to support its compliance with the GDPR. The Braze Services offer certain functionality to assist a customer in complying with applicable laws, such as subscription preference management, custom data collection settings, and deletion and exporting options. Further information on Braze functionality can be found in the Braze Documentation. Additionally, Braze's Main Subscription Agreement incorporates Braze's Data Processing Addendum (DPA), which sets out clear contractual commitments and security protections in the processing of customer personal data.

Is Braze also a Controller?

Yes, where Braze collects personal data for its own purposes, Braze is a Controller. For example as an employer to its employees or as part of recruitment. Braze's Privacy Policy describes Braze's processing as a Controller.

Does the GDPR permit the transfer of personal data outside of the EU or UK for processing?

Yes, provided that there is an adequate level of protection or appropriate safeguards in place, organizations are able to transfer personal data outside the EU or UK for processing. Braze has implemented a number of approved transfer mechanisms offering appropriate safeguards including certification under the Data Privacy Framework, the use of EU Standard Contractual Clauses (SCCs), and the UK Addendum to the SCCs with its customers.

Does Braze provide hosting in the EU?

Braze offers its customers the option to host their data either in the United States or in Europe using Amazon Web Services (AWS) as Braze's hosting provider. In Europe, the hosting location is in Frankfurt, Germany, with back-ups in Ireland.

What security measures does Braze provide?

Braze has implemented technical and organizational measures for the protection of personal data. Details of Braze's security measures are described in the Braze Security and Architecture Datasheet. Braze has completed its annual SOC 2 Type 2 audit and is ISO 27001 certified and is regularly audited against those standards.



Does Braze notify its customers in the event of a security incident?

Yes, in the event of a personal data breach, Braze will notify its affected customers without undue delay upon becoming aware as required under GDPR and will take steps to mitigate and remediate the security incident.

Does Braze restrict its personnel from accessing customer personal data?

Yes, personal data within the Braze Services can only be accessed or processed by Braze employees who have a need to access or process that personal data to provide the Braze Services, to provide support, as required by law, or as directed by the customer.

Does Braze provide training to its employees on the handling and use of personal data?

Yes, every Braze employee undergoes mandatory Privacy training annually and Braze has a number of internal policies and procedures in place concerning the processing of personal data.

Does Braze assist with customer audits?

Yes, Braze makes third party audits available to customers and by filling out audit questionnaires. If required by law, Braze will provide reasonable cooperation and make relevant Braze employees available to customers.

Does Braze have any customer-facing documentation about its GDPR compliance?

Yes, Braze has materials on its website including Braze's Privacy Policies, <u>Data Privacy Framework Notice</u> and <u>Cookie Policy</u>. Braze regularly updates the materials on its website enabling its customers to understand how Braze processes personal data and the ways that the Braze Services assist its customers to comply with their obligations under the GDPR.

Does Braze use sub-processors?

Yes, Braze is responsible for the acts and omissions of its sub-processors and has written contracts with each sub-processors. A list of Braze sub-processors can be found on the <u>sub-processor</u> page of the Braze DPA.

Does Braze assist its customers in handling Data Subject Rights?

The Braze Services have functionality to allow its customers, as Controllers, to facilitate and self-serve data subject requests. For example, a customer can make API calls to Braze's REST APIs to export the personal data of an individual in a machine-readable format. Further information can be found on the <u>Data Protection Technical Assistance</u> page within the Braze Documentation.

Does Braze have a Data Protection Officer (DPO)?

Yes, Braze has appointed a DPO who has oversight, responsibility and is the main point of contact for the processing of personal data at Braze. The Braze DPO can be contacted at privacy@braze.com.

Can Braze advise a customer on how to comply with the GDPR?

Braze cannot provide specific legal advice to its customers on their compliance with the GDPR or applicable laws. If a customer has a question about whether the GDPR requires certain actions, it should seek independent legal advice.

Can a customer access and delete personal data in the Braze Services?

At any time during the term of their agreement, Customers can export or delete personal data using functionality contained within the Braze Services.

Where can I find more information on Braze's privacy practices?

Further information can be found on <u>Braze's Privacy</u> <u>Portal</u>. You can also contact the Braze Privacy Team at <u>privacy@braze.com</u>.

