

PUBLICATION 1 SERVICE DESCRIPTION FOR BUSINESS VPN SATELLITE SERVICE – TERRESTRIAL DEDICATED

1.1 Definition

Orange's Business VPN Satellite Service – Terrestrial Dedicated provides connectivity to remote Locations where terrestrial based services are inaccessible or highly degraded or as a back-up of terrestrial networks. As noted below, Customer may choose from two (2) types of Business VPN Satellite Service – Terrestrial Dedicated. Business VPN Satellite Service – Terrestrial Dedicated is only available for use with an Orange Network Service, which is described in separate Service Description attached to this Agreement.

1.2 Overview

The Business VPN Satellite Service – Terrestrial Dedicated provides fixed and dedicated capacity for IP applications via a network of two-way satellite terminals that operate in a star configuration.

Bandwidth is made available independently in the hub to remote Location direction (outbound, downstream, or forward carrier) or in the remote Location to hub direction (inbound, upstream, or return carrier) or in both directions simultaneously. There are two (2) types of Business VPN Satellite Terrestrial Dedicated Services from which Customer may choose: Dedicated and Dedicated Plus ("Dedicated+"), each of which are described in Clause 1.3 below.

1.3 Options: Dedicated and Dedicated+

1.3.1 Dedicated+ Satellite Service. Customer may Order the Dedicated + Satellite Service if Customer has a dedicated satellite service that Customer intends to migrate to a shared satellite service in the future.

1.3.2 Dedicated Satellite Service. Customer may Order the Dedicated Satellite Service if Customer requires a single channel per carrier (SCPC). SCPC allows Customer to use a single satellite channel for all satellite transmissions. The SCPC solution is the satellite equivalent of a terrestrial leased line. The SCPC has the following characteristics:

- (a) "Clear" channel (i.e. Customer gets a channel for its own use and no signaling or protocol needs to be specified);
- (b) Bandwidth fully allocated to a specified Location with no users other than Customer;
- (c) Serial interface to the User's remote equipment;
- (d) From 64 kbps to 2 Mbps standard access speeds; and
- (e) Point-to-Point (hub to remote Location).

1.4 Service Features and Functions

The Business VPN Satellite Service – Terrestrial Dedicated is provided with a range of available forward carrier and return carrier sizes from which Customer may choose. The satellite space segment is dedicated to Customer's remote Locations for the same VPN using Orange's Network.

1.5 Optional Service Features

Business VPN Satellite Service – Terrestrial Dedicated is fully compatible with most characteristics of Orange's Network. The following optional service features may be available with both Dedicated and Dedicated+ Satellite Service options upon Customer's request and Orange's prior written approval, which will be based on specific tests and validations conducted by Orange:

- A contingency option of bundled Satellite Equipment (excluding the antenna), where the primary Satellite Equipment is secured by the secondary indoor unit and outdoor unit when failure occurs on the primary Satellite Equipment;
- Internet access may be configured on a non-satellite connected Location;
- IPSec over Orange's Network;
- Multi VPN;
- Mission-critical Locations;
- Resiliency service options;

1.6 Network Service Features Not Supported

Except as otherwise agreed upon by Orange in writing, Network Service options other than those identified in Clause 1.5 (Optional Service Features) above are not available with Business VPN Satellite Service – Terrestrial Dedicated, including:

- ATM access;
- Integrated Internet access on the Customer-edge Router (as defined in the Business VPN Service Description) connected through the satellite link; and
- Multiprotocol Support (e.g. SNA, X.25, APLS, MATIP, DECnet IV, and IPX).

1.7 Security

The Satellite Equipment includes an embedded encryption chip (e.g. 3 DES encryption), which may be activated only upon Customer's request and subject to an additional Charge.

NEITHER ORANGE NOR ITS THIRD-PARTY SUPPLIERS WARRANT OR GUARANTEE THE SECURITY OF CUSTOMER'S SATELLITE TRANSMISSIONS USING THE ENCRYPTION CHIP OR OTHERWISE. CUSTOMER ACKNOWLEDGES THAT UNAUTHORIZED INTERCEPTION OF SATELLITE TRANSMISSIONS MAY OCCUR AND ORANGE WILL NOT BE LIABLE FOR ANY SUCH INTERCEPTION OR OTHER BREACH OF SECURITY RELATING TO ANY SATELLITE TRANSMISSION. CUSTOMER WILL BE SOLELY RESPONSIBLE FOR ITS OWN NETWORK SECURITY POLICY AND SECURITY VIOLATION RESPONSE PROCEDURES.

1.8 Acceptance Testing

Upon completion of the physical installation of the Business VPN Satellite Service – Terrestrial Dedicated, Orange will commence acceptance testing to confirm that all aspects of the Service are operational with the terms set forth in this Service Description.

1.9 Data Processing

Exhibit A sets out the subject matter, duration, nature, and purpose of the Processing, the type of Personal Data and the categories of Data Subjects of the Processing of Personal Data carried out by Orange as part of this Service.

EXHIBIT A DESCRIPTION OF PROCESSING OF PERSONAL DATA BY ORANGE BUSINESS SERVICES AS PROCESSOR FOR CUSTOMER - ARTICLE 28 OF GDPR**Name of the Service: Business VPN Satellite Terrestrial****ExA.1 Processing Activities**

Collection (receiving personal data of employees and users of customer who are natural persons, etc.).	Yes
Recording (capturing personal data in a file or software program, including the generation of metadata like Call Details Records, etc.).	Yes
Organization (organizing personal data in a software program, etc.).	Yes
Storage (keeping the personal data in a software program for a determined period, including for archiving purposes, etc.).	Yes
Modification (modifying the content or the way the personal data are structured, etc.).	Yes
Consultation (looking at personal data that we have stored in our files or software programs, etc.).	Yes
Disclosure or otherwise making available (communicating personal data to another recipient by any means, etc.). Except for disclosure mentioned in the service description or required by law, or otherwise specifically directed by the customer, the categories of potential recipients are only those subcontractors referenced herein or otherwise approved by the customer.	Yes
Combination (merging two or more databases with personal data, etc.).	Yes
Restriction (implementing security measures in order to restrict the access to the personal data, etc.).	Yes
Deletion or destruction (deleting or anonymizing the personal data or destroying the hard copies, etc.).	Yes
Other use (if "YES" to be detailed).	No

ExA.2 Categories of Personal Data Processed (Type of Personal Data)

Categories of Personal Data Identifiable by Orange	
Identification data (ID document / number, phone number, email, etc.).	Yes
Traffic / Connection data (IP address, Mac address, CDRs, access and usage data, online tracking and monitoring of services).	Yes
Location Data (geographic location, device location).	No, there is no link between vessel GPS and end-users application today.
CRM data (billing information, customer service data, ticketing info, telephone recordings, etc.).	Yes
Financial data (bank account details, payment information).	No
Sensitive Data (racial/ethnic background, religion, political or philosophical beliefs, trade union membership, biometric data, genetic data, health data, sexual life, and/or orientation).	No
Categories of Personal Data Not Identifiable by Orange	
Any categories of personal data that may be recorded or stored (voicemail, call recording, files) by Customer and which recording is hosted on Orange infrastructure.	No

ExA.3 Subject-Matter and Duration of the Processing

Subject-Matter of Processing		Duration of Processing
Service activation.	Yes	For the period necessary to provide the service to the customer plus 6 months.
User authentication.	Yes	
Incident Management.	Yes	
Quality of Service.	No	
Invoice, contract, order (if they show the name and details of the contact person of Customer).	Yes	For the period required by applicable law.
Itemized billing (including traffic / connection data of end-users who are natural persons).	No	
Customer reporting.	No	
Hosting.	No	
Other.	No	

ExA.4 Purposes of Processing

Provision of the service to Customer.

ExA.5 Categories of Data Subject

Customer’s employees/self-employed contractors using or managing the service or the contract who are natural persons.	Yes.
Customer’s other end-users of the service who are natural persons (client of the Customer, etc.); usable by users other than internal users.	Yes, according to customer’s usage.

ExA.6 Sub-Processors

Sub-Processors Approved by Customer	Safety Measures
Orange Business Services entities that are processing information for this Service and that are within the EU/EEA are communicated separately to the customer.	NA
Orange Business Services entities that are processing information for this Service and that are outside of the EU/EEA are communicated separately to the customer	Intra-group agreements with standard model clauses, Binding Corporate Rules approval request filed with CNIL.
Orange Business Services suppliers which are performing one or more processing activities described above in connection with this Service and that are within the EU/EEA are communicated separately to the customer.	NA
Orange Business Services suppliers that are processing information for this Service and that are outside of the EU/EEA are communicated separately to the customer.	Standard Model Clauses in contract with supplier.

END OF SERVICE DESCRIPTION FOR BUSINESS VPN SATELLITE SERVICE – TERRESTRIAL DEDICATED