Overview
This document describes data privacy measures and data storage policies that are specific to the Barracuda CloudGen WAN virtual appliance.

Barracuda is dedicated to protecting our customers’ privacy and helping them protect the privacy of their users and customers. Our products help customers comply with global, regional, and national privacy regulations, including technical requirements of the General Data Protection Regulation (GDPR).

CloudGen WAN provides multiple VPN transports with each transport capable of using a different WAN connection, thereby expanding on the concept of a traditional VPN tunnel with only one VPN transport to one logical VPN tunnel. CloudGen WAN also provides redundant, reliable, and failsafe network connections: the VPN tunnel is up and can transmit traffic as long as at least one transport is operational. Barracuda CloudGen WAN is delivered to customers in the form of a virtual appliance. Customers deploy Barracuda CloudGen WAN on their internal networks.

Data Inventory, Data Protection Impact Assessment (DPIA), and Data Mapping
Barracuda has conducted and maintains a data inventory and data mapping of the collection, transfer, and storage of Personal Information for Barracuda CloudGen WAN. Further, the required Data Protection Impact Assessment (DPIA) for applicable controls has been completed and safeguards are in place to mitigate potential risks.

Customer Consent
Barracuda’s Data Processing Addendum sets forth each party’s rights and obligations with regard to the processing of personal data. Barracuda’s Data Processing Addendum for data controllers can be executed on our Trust Center within the Self Service Center at the following address:
https://www.barracuda.com/company/legal/trust-center

Cross-Border Data Transfer
Barracuda complies with the EU – US cross-border data transfer mechanisms approved by the European Commission regarding the collection, use, and retention of Personal Information transferred from the European Union to the United States. Any transfer of customer data outside the European Union will be done in compliance with the GDPR and applicable local privacy laws. Barracuda’s Standard Contractual Clauses are located within our DPA at the following address:
https://www.barracuda.com/company/legal/trust-center

Employee Training
Upon hire and annually thereafter, Barracuda employees who have access to customer data undergo security and data privacy awareness training to ensure their continued knowledge of obligations and responsibilities to comply with data protection requirements.
Retention and Right to Be Forgotten (RTBF)
All customer data is stored directly on the Barracuda CloudGen WAN virtual appliance in the customer’s environment. For this product offering, Barracuda is not hosting any associated raw personal information of customers. You may reach out to legal@barracuda.com if you wish to submit a Right to Be Forgotten (RTBF) request for transactional level data.

Data Transmission and Storage
Encryption is used for any VPN traffic in order to securely communicate and transfer data (e.g. files, ERP traffic, VoIP, etc.) between sites (site-to-site VPN) or clients (client-to-site VPN). All data is encrypted using AES 256-bit encryption.

Access Control
Customers can configure user roles to manage access privileges to the Barracuda CloudGen WAN virtual appliance.

Data Location
The Barracuda CloudGen WAN virtual appliance and all respective data resides in the customer’s environment.