Barracuda Impersonation Protection and Incident Response
Data Privacy Overview
Overview
This document describes data privacy measures and data storage policies that are specific to the Barracuda Impersonation Protection and Incident Response.

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).

Barracuda Impersonation Protection is a comprehensive artificial intelligence (AI) solution for real-time spear phishing and cyber fraud defense. Delivered as a cloud service, Impersonation Protection utilizes artificial intelligence to protect people, businesses, and brands from spear phishing, impersonation attempts, business email compromise and cyber fraud.

Barracuda Incident Response enables your IT team to identify, track, and resolve email attacks from outside your organization, for example, a phishing or ransomware attack. You can search for any email that your users may report to you as malicious and perform remediation actions. Incident Response allows you to identify these users for potential security concerns on their workstations and determine if additional security actions are necessary.

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 Impersonation Protection and Incident Response. 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)
At the expiration or termination of your service with Barracuda, Barracuda generally stores customer data for 6 months for product improvements hosted in a separate system.

If you wish to send a Right to Be Forgotten (RTBF) request, please send an email to legal@barracuda.com and Barracuda will provide timely updates through the process of data deletion.

Data Transmission and Storage
Barracuda Impersonation Protection and Incident Response transmit data from the customer’s O365 server to the Barracuda Cloud via HTTPS. Once received, the data is indexed and stored using AES 256-bit encryption.

Access Control
If the customer requests access to their data, access is tracked back to the individual and logs are pushed to a centralized logging service.

Data Location
Barracuda maintains a global network of data centers and annually verifies that each one meets defined security and privacy requirements. The cloud infrastructure for Barracuda Impersonation Protection and Incident Response is deployed in the Americas region via AWS. Any transfer of customer data outside the regions will be done in compliance with the GDPR and applicable local privacy laws.