

**What's changed
1 April 2019**

Privacy Policy

| Clause reference | What's changed |
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| Part 1 - Collection Data - data collected | clarified that Customers need to notify their employees, not necessarily get their consent: <i>... each customer must make sure that they have notified, and if required by law obtained the consent of, such employees or authorised representatives to Megaport collecting and using such personal information in accordance with this Privacy Policy</i> |
| Part 1 - Collection Data - data collected | clarified who the data controller is over personal data linked to a Customer's account: <i>Data controller with regards to the Collection Data and the related Services is the relevant Megaport entity providing the Services to the Customer Megaport Limited or, if you are located in one of the countries with a local Megaport subsidiary, this local subsidiary is the data controller.</i> |
| Part 1 - Collection Data - data use | clarified the lawful basis for marketing to existing customers as well as the opt-in and opt-out functionalities: <ul style="list-style-type: none"> • <i>.....it will not do so without Customer's explicit prior double opt-in consent as required by applicable direct marketing laws</i> and: <i>... necessary to fulfil the Services towards the Customer and to protect Megaport's protected interests specified above and in the case of promotional communication based on Customer's consent</i> |
| Part 1 - Transmission data | references to data 'packages' replaced with data ' packets ' throughout |
| Part 2 - Recruitment - data collected | clarified that sensitive personal data is only processed if ever provided by you of your free will: <i>Megaport will only process sensitive personal data which you may provide to us of your free will</i> |
| Part 2 - Recruitment - data usage | referenced the lawful basis for our recruitment-related processing: <i>... solely to the extent this is necessary for the application process and/or your subsequent employment with Megaport, as required by our legitimate interests and applicable laws.</i> |
| Part 3 - Recruitment - sharing | clarified that we only share recruitment-related data with others to the extent permitted by law: <i>...within the Megaport group of companies and with the following persons, to the extent permitted by law:</i> |
| Part 3 - Visitors to the Megaport Websites | made express mention of opt-in marketing-related use: <ul style="list-style-type: none"> • <i>to enable you to use the Website and to provide our Services (including by sending you information you may have specifically requested as well as other promotional communications if you have opted-in thereto);</i> |
| Part 4 - General - where your data is stored & processed | specifically noted some of the ways we safeguard your data when being processed in non-adequate countries : <i>.... ensure that recipients in such countries comply with a level of data protection that is considered to be adequate from the perspective of EU data protection laws (such as being covered by the EU-US Privacy Shield or standard contractual clauses approved by the European Commission),</i> |
| Part 4 - General - your rights | expressly mentioned your right to data portability under certain circumstances, and your right to complain to the relevant supervisory body |