

FREQUENTLY ASKED QUESTIONS & ANSWERS ON THE LANSCHOOL AIR DATA PROCESSING AGREEMENT (DPA)

What is the LanSchool DPA?

This LanSchool Air Data Processing Agreement and its annexes (“DPA”) forms part of the Stoneware Sales Agreement or other written or electronic agreement between Stoneware, Inc. and Customer for the purchase of LanSchool Air services from Stoneware, Inc., a Lenovo company. The DPA is designed to reflect the parties’ agreement in relation to the privacy and security standards that will apply to the responsible use and protection of Customer personal data and related confidential information to be processed by Stoneware under the agreement. The DPA supplements any agreement between the parties with respect to the processing of Customer data and will be effective from the moment that Customer accepts LanSchool Air Terms of Service. To facilitate new customer relationships and the contracting process, the DPA has been pre-signed on behalf of Stoneware. The DPA may be read in conjunction with the [LanSchool Air & Lenovo NetFilter Privacy Statement](#) (“Privacy Statement”).

Is the LanSchool Air DPA global in scope or specific to particular regions?

The DPA is intended to apply globally since Stoneware and Lenovo are global companies. Therefore, the DPA reflects applicable global standards for privacy and security. However, we have also developed our privacy and security programs and this DPA with particular privacy laws (e.g., EU’s GDPR, Brazil’s LGPD, California’s CCPA/CPRA, other national and local education privacy laws) and security standards (e.g., ISO, NIST) in mind. If a customer has additional or equivalent requirements or standards it believes will need to be met by Stoneware and Lenovo, we will review and respond to those requests as appropriate.

What Customer Data does LanSchool Air collect and store?

Please see the [Privacy Statement and Annex A \(Processing Details\) of the DPA](#). Stoneware and Lenovo process only necessary information to keep the LanSchool Product(s) working their best and to help customers make the most of them.

Do Stoneware and Lenovo share Customer Data with any third parties?

For more information about how we share Customer Data in the context of LanSchool Air, please see Annex B of the DPA and the [Privacy Statement](#).

Stoneware and Lenovo contract with other companies, who act as our suppliers to perform services for Stoneware and Lenovo, such as data hosting, processing, marketing, promotions, event sponsorship, product development, and analytics.

Such services may require Stoneware to share customer information with its service providers. In such cases, we take steps to ensure that these suppliers to Stoneware are adhering to Stoneware's standards for robust privacy and strong security. Appropriate privacy, security and/or data processing agreements are signed to address responsibilities of the supplier to protect and responsibly process data of the Customer.

Stoneware also relies on other Lenovo businesses and operations globally to provide services to support LanSchool products and services. LanSchool may also contain various links to third-party websites or services that may provide additional information, services, or promotions. These sites and services may be operated independently of Stoneware and Lenovo and have their own separate privacy and data collection practices. Any information customers provide to these websites and services will be governed under the terms of their privacy policy, if any. Stoneware and Lenovo have no responsibility or liability for the actions or policies of these independent sites and services and are not responsible for the content or privacy practices of such sites.

Do Stoneware and Lenovo transfer Customer Data internationally?

As a global enterprise, Lenovo and Stoneware necessarily process Customer Data in and/or transfer such data to the locations where it does business. These may include data centers and/or functions located in the EU/EEA/UK, United States, Asia-Pacific (Australia), and elsewhere as applicable. The specific storage location is based on the customer's country location (e.g., European-sourced data to be standardly stored in the United Kingdom); or the customer may request the data to be stored in another location.

Lenovo manages these transfers within the framework of the law and uses appropriate compliance mechanisms (including but not limited to Standard Contractual Clauses in our intra-group agreements and in our supplier agreements) to effectuate transfers of personal data across borders. If a particular country or customer has a data localization requirement that may restrict the transfer of Customer Data across borders, Lenovo will meet that requirement to the extent applicable or practicable. Otherwise, Lenovo will meet the requirements for Customer Data processing, privacy and security as set forth in the customer's contract and data transfer agreement with Lenovo, and Lenovo will limit its processing to only established legitimate interests.

What is the purpose of Annex D of the DPA and is Annex D necessary in all cases?

Annex D represents contractual provisions serving as safeguards for safe personal data transfers to third countries, which are required by applicable data protection laws.

It has been developed with Europe's General Data Protection Regulation (GDPR) in mind and is generally applicable to only processing activities that may involve the transfer of Personal Data from the European Union and European Economic Area and/or other countries with similar adequacy or equivalency standards pertaining to cross-border data transfers. Specifically, Annex D incorporates EU Standard Contractual Clauses ("SCCs") as set out in the Commission Implementing Decision (EU) 2021/914 of 4 June 2021 on standard contractual clauses for the transfer of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council, the UK

International Data Transfer Addendum to the [European Commission's Standard Contractual Clauses for International Data Transfers](#) and other similar equivalency standards under applicable data protection laws.

Will Stoneware sign the Customer's data processing agreement instead of the LanSchool Air DPA?

Stoneware believes that it is necessary to establish consistent standards of responsible use and protection of all our Customers' data globally and to avoid the need to enter potentially conflicting standards of privacy and security compliance with our customers. Therefore, while we will certainly take into consideration Customer requests to enter into their own data processing agreement templates, Stoneware starts from the premise that the LanSchool Air DPA should apply.

Does Stoneware allow the Customer to propose edits to the LanSchool Air DPA?

Yes. Stoneware welcomes reasonable proposals by the Customer to edit the DPA *if necessary*.

Does the LanSchool Air DPA reflect strong privacy and security standards?

Please see Annex A (Technical and Organizational Measures) of the DPA. Stoneware and Lenovo have placed customer privacy and security at the forefront. Therefore, we have developed robust privacy and security programs that incorporate industry-class policies, procedures, processes, technologies, training, and other controls. We have developed the DPA with these controls in mind.

Is LanSchool Air compliant with the EU GDPR and/or other data protection laws?

Lenovo and Stoneware are committed to being trusted partners, innovators, and suppliers of secure, high-quality products and services globally. Security and privacy are at the center of our philosophy, reflecting the commitment to providing products and services that meet or exceed industry standards for customer security, privacy, and data protection. As such, our privacy and security programs aim to meet the highest standards. While no universal certification exists that would demonstrate Stoneware's and/or Lenovo's compliance with applicable data protection laws and other related standards, Stoneware and Lenovo have implemented robust controls and safeguards that align with ISO27001 and/or other internationally recognized standards.

Where can I learn more about privacy and security at Stoneware and Lenovo and how Lenovo will process Customer data?

If you require further information regarding our privacy and security standards, please contact your Stoneware account representative who will be able to address your questions and provide you with a more details about privacy and security at Lenovo. Please note that you can also find more information about LanSchool Air's privacy and security practices by reviewing the [Privacy Statement](#).

Will Stoneware update the LanSchool Air DPA on a regular basis?

We may update the DPA to accommodate new legal requirements or as necessary to reflect operational updates. If you have an active LanSchool Air subscription, we will let you know via email or via in-product notification. You can find archived versions of the DPA [here](#).