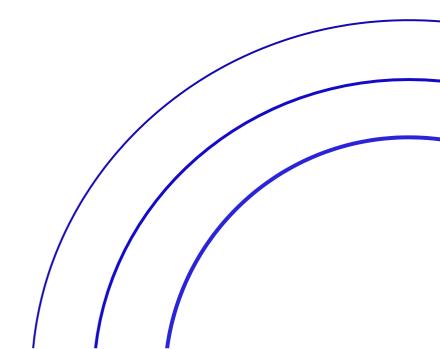


Calligo Data Residency





Document Control

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DESCRIPTION:	Data Residency		
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DOCUMENT OWNER & APPROVAL

The VP Cloud Operations is the owner of this document and is responsible for ensuring that this service description is reviewed in line with the review requirements of Calligo's Information Security Management System, Project Management Frameworks as well as the guidance and requirements of the CSSF.

Approved by the Chief Operating Officer, Calligo ("Entity") on 17 November 2022

CHANGE HISTORY RECORD					
VERSION	DESCRIPTION OF CHANGE	AUTHOR	APPROVAL	DATE OF ISSUE	
1.0	Original Version	VP Cloud Operations	Chief Operating Officer	17/11/2022	
1.1	Added Sophos MDR	VP Cloud Operations	Chief Operating Officer	17/02/2023	
1.2	Added Bitlocker	VP Cloud Operations	Chief Operating Officer	08/06/2023	



Data Residency

This document outlines the locations client data may be stored in or accessed from as part of the delivery and provision of Calligo Support Services:

Residency Item	Description	System	Storage Location
Data Centre	Locations	VDC's	Channel Islands (Jersey & Guernsey
			UK (London)
			Ireland (Dublin) Canada (Toronto and Barrie) Luxembourg
ITSM Data	ITSM Ticket information and logged attachments	Viaje	London Luxembourg Jersey
Patching policies, patch, and compliance data	System Patching data and update catalogue	System 1 – Calligo System Monitoring platform	Canada EU UK
	Asset Compliance data for reporting purposes	System 2 – Remote Monitoring and Management (RMM) platform	EU
Monitoring policy and thresholds	Systems monitoring data. (e.g., resource and service monitors, and alert thresholds)	System 1 – Calligo System Monitoring platform	Canada EU UK
		System 2 – Remote Monitoring and Management (RMM) platform	EU
CommCell	Locations of CommVault Storage	Calligo Hosted	Channel Islands (Jersey & Guernsey
	Locations		UK (London)
			Ireland (Dublin) Canada (Toronto and Barrie) Luxembourg
Data Centre	Microsoft hosted Data Centres.	Data Centres	https://azure.microsoft.com/en-
	Bata Controc.		gb/global-
			infrastructure/geographies/#overview
Call recordings	Call recordings are	Microsoft Teams Voice	https://azure.microsoft.com/en-
	stored in the OneDrive for	Voice	gb/global-
	Business account		infrastructure/geographies/#overview
Voicemails and transcriptions	Voicemails and call transcriptions are both stored in the receiver's Exchange mailbox.	Microsoft Teams Voice	https://azure.microsoft.com/en- gb/global- infrastructure/geographies/#overview



Sophos MDR	Security event data (e.g. CustomerID, MachineID, UserID, Sophos Telemetry data)	Sophos MDR	Stored in the region where the Sophos customer account is provisioned: Sophos Managed Detection and Response (MDR) Privacy Data Sheet Sophos
Bitlocker Policy / Configuration	Systems Management data. (e.g., information on system names, IPs, status)	System 1 – Customer on-premises System 2 - Intune	Data is held within the customer environment. Data is held within an approved Azure Region.
Bitlocker Recovery Key	Bitlocker Recovery Key	System 1 – Local Endpoint System 2 - AD Systems 3 - AAD	Customer on-premises AD Within an approved Azure Region