

Microsoft Clarity Customer Questionnaire FAQs

We understand that our customers may occasionally have routine questions about security, data privacy, and other matters related to Microsoft Clarity. Microsoft Clarity is not a vendor or supplier to our customers. Microsoft Clarity is a user behavior analytics tool that helps our customers understand how users are interacting with their website; we do not act at the direction of our customers, meaning we do not customize our product for individual customers. As such, we do not complete customer questionnaires intended for vendors and suppliers. The following resources provide general information about Microsoft Clarity, and discuss the company's policies and practices related to the most common topics for which we receive questions.

General Information about Microsoft Clarity

- Microsoft Clarity Terms of Use: Microsoft Clarity Free Heatmaps & Session Recordings
- Microsoft Clarity Documentation: <u>Clarity | Microsoft Docs</u>
- Microsoft Clarity FAQs: Frequently asked questions | Microsoft Docs
- Microsoft Clarity Blog: Understand your customers | Microsoft Clarity Blog
- Microsoft Clarity Github link: microsoft/clarity (github.com)
- Microsoft Clarity Support alias: ClarityMS@microsoft.com

General Information about Microsoft

- About Microsoft: microsoft.com/en-us/about
- Company Information: microsoft.com/en-us/about/company
- Investor Relations Site: microsoft.com/investor/Default.aspx
- Annual Reports: microsoft.com/investor/AnnualReports/default.aspx
- Corporate Governance: microsoft.com/investor/CorporateGovernance/Overview/default.aspx
- Official Microsoft Blog: blogs.microsoft.com
- Microsoft's Diversity Initiative: microsoft.com/en-us/diversity/default.aspx

Microsoft Legal and Compliance Information

- Legal and Corporate Affairs: microsoft.com/about/legal
- Compliance and Ethics at Microsoft: microsoft.com/en-us/legal/compliance
- Microsoft's Commitment to Anti-Corruption: microsoft.com/enus/legal/Compliance/anticorruption/default.aspx
- Information about submitting concerns to the Office of Legal Compliance: microsoft.com/enus/legal/compliance/buscond/integrity.aspx
- Working Responsibly Integrity and Governance: microsoft.com/about/corporatecitizenship/en-us/working-responsibly/integritygovernance
- Microsoft Supplier Code of Conduct for Microsoft Suppliers:
 microsoft.com/about/companyinformation/procurement/process/en/us/contracting.aspx
- You can find information about Microsoft's Standards of Business Conduct for employees at: microsoft.com/enus/legal/compliance/buscond/integrity.aspx.

Microsoft Clarity Security Information

Microsoft operates a series of internal security programs that can be read about at www.microsoft.com/en-us/securityengineering. Microsoft uses a variety of security technologies and procedures to help protect personal data from unauthorized access, use, or disclosure. Microsoft also has internal standards and policies relating to

Last updated: June 2022



privacy and security risk assessments, secure data-handling practices, and data classification that Microsoft Clarity conforms to.

- As part of our Security Development Lifecycle, we perform security reviews, static and dynamic analysis testing,
 penetration testing activities, and secure our infrastructure with active monitoring. Microsoft Clarity does not share
 the details of penetration testing with our customers. Our Microsoft Clarity infrastructure is hosted in Azure, which
 participates in quarterly SOC2 audits that cover principles around security, privacy, confidentiality, processing
 integrity, and availability: www.servicetrust.microsoft.com/Documents/ComplianceReports.
- The data that Clarity collects and processes is encrypted in transit and at rest. For information about what data we collect, visit <u>Clarity data | Microsoft Docs.</u>
- Clarity authenticates users using OpenID Connect / OAuth2 through MSA, Facebook, Google. All password management is handled directly within those authentication platforms.
- For business continuity and disaster recovery, please refer to <u>Datacenter business continuity and disaster recovery</u> <u>Microsoft Service Assurance | Microsoft Docs</u>.

Microsoft Clarity Privacy Information

- Most information about Microsoft Privacy is found in the Microsoft Privacy Statement: <u>www.privacy.microsoft.com/enus/privacystatement</u>
 - Clarity data is transferred to US data centers for storage and processing.
- Microsoft Clarity Cookies: <u>docs.microsoft.com/en-us/clarity/cookie-list</u>
- If you have questions regarding the July 2020 decision by the European Court of Justice in the "Schrems II" case,
 please see our response to the recent ruling at blogs.microsoft.com/eupolicy/2020/07/16/assuring-customersabout-cross-border-data-flows.
- California Consumer Privacy Act (CCPA): The CCPA applies to California businesses and California residents,
 however Microsoft extends the core rights of CCPA to all Americans. Microsoft Clarity is a controller when it
 collects information directly from consumers or a third party when it receives personal information from its clients.
 It is not a service provider. For this reason, we do not execute service provider addendums with our customers as
 they are not applicable.
 - → Microsoft will honor data subject rights (DSRs) through the standard controls and processes applicable to Microsoft Clarity.
- General Data Protection Regulation EU (GDPR): Microsoft Clarity makes numerous decisions about the purposes
 and means of processing data we collect directly from Microsoft Clarity users, including how we use the data we
 collect to improve our services. Therefore, under GDPR, Microsoft Clarity is a controller and not a processor of that
 data. Microsoft Clarity is delivered pursuant to Microsoft's data protection policies and procedures as a data
 controller, including the Microsoft Privacy Statement, which explains to consumers how Microsoft collects and
 processes personal information as a data controller; and Microsoft maintains appropriate processes to select,
 contract with, and monitor the data processing activities of vendors that process personal information on behalf of
 Microsoft.
 - Microsoft is the data controller, and not a data processor, with respect to data processed in connection with Microsoft Clarity. Microsoft alone determines the means, the scope, and the purpose of data processing in context of UET. For these reasons, we do not execute data processing terms or joint controller terms with our customers.

Last updated: June 2022