

Product/Service Feature Guidance – Bronto

JULY 2020

Disclaimer

The purpose of this document is to outline some of the product features currently available or under consideration for the Oracle service offering referenced above, with a focus on privacy and security related controls. Customers should refer to the available on-line product documentation for a more complete description of available product features and functionality.

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Oracle Cloud Services Agreements and Documentation

Oracle Cloud Services: <http://www.oracle.com/us/corporate/contracts/cloud-services/index.html>

Oracle NetSuite Terms of Service Agreements: <http://www.netsuite.com/portal/resource/terms-of-service.shtml>

Privacy Features	Description	Oracle Documentation
Data Minimization	<p>Bronto provides customers the ability to define each user's permissions to control which features, lists, segments and fields users have access to.</p> <p>Permissions are divided into different categories: Contacts, Messages, Automated Message Rules, SMS, Messaging, Lists, Segments, Fields, and Other.</p>	<p>Delete Contact Fields https://help.bronto.com/bmp/help-source/concept/c_bmp_contacts_import_about.html</p> <p>Delete a List https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_lists_delete.html</p> <p>Contact Imports https://help.bronto.com/bmp/help-source/concept/c_bmp_contacts_import_about.html?hl=contact%2Cimport</p> <p>Add or Update Contacts Using Data Loader https://help.bronto.com/bmp/help-source/task/t_bmp_app_data_loader_contacts_add_update.html</p> <p>Manage Duplicate Contacts https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_duplicate_contacts.html</p> <p>Use the Clean Contacts Feature https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_manage_use.html</p>

		<p>Data Retention Policy https://help.bronto.com/bmp/help-source/concept/c_bmp_data_retention_policy.html</p> <p>User Permissions https://help.bronto.com/bmp/help-source/concept/c_bmp_home_users_permissions_about.html</p> <p>Grant a User Administrator Permissions https://help.bronto.com/bmp/help-source/task/t_bmp_home_users_permissions_grant_admin.html</p> <p>Lock a User to Prevent Them from Logging In https://help.bronto.com/bmp/help-source/task/t_bmp_home_users_permissions_lock_user_access.html</p> <p>Grant a User API Permissions https://help.bronto.com/bmp/help-source/task/t_bmp_home_users_permissions_grant_api.html</p> <p>Allow a User to Manage (Create, Edit, and Delete) and View Contacts https://help.bronto.com/bmp/help-source/task/t_bmp_home_users_permissions_user_can_manage_contacts.html</p> <p>Allow a User to create, Edit, and View Fields https://help.bronto.com/bmp/help-source/task/t_bmp_home_users_permissions_create_fields.html</p>
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<p>Data Deletion at Contract Term or Termination</p>	<p>Bronto provides customers a number of options to delete personal information, either manually or through automated means. Manual deletion through the UI can be performed by users given the appropriate roles and permissions.</p>	<p>Delete a User https://help.bronto.com/bmp/help-source/task/t_bmp_home_users_delete_user.html</p>

	<p>Data Deletion at Customer Contract Termination:</p> <ul style="list-style-type: none"> • Upon termination of the Bronto service, data residing in the production environment is retained in Disabled or Inactive status for up to 90 days. • Upon the expiration or termination of Bronto customer services securely deleted from the production service environments within 12 months. • Archival copies after account deletion are retained for no more than 15 months. 	<p>Delete Contact Fields https://help.bronto.com/bmp/help-source/concept/c_bmp_contacts_import_about.html</p> <p>Contact Imports https://help.bronto.com/bmp/help-source/concept/c_bmp_contacts_import_about.html?hl=contact%2Cimport</p> <p>Add or Update Contacts Using Data Loader https://help.bronto.com/bmp/help-source/task/t_bmp_app_data_loader_contacts_add_update.html</p> <p>Manage Duplicate Contacts https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_duplicate_contacts.html</p> <p>Use the Clean Contacts Feature https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_manage_use.html</p> <p>Delete a List https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_lists_delete.html</p> <p>All SMS Messages Page https://help.bronto.com/bmp/help-source/reference/r_bmp_messages_sms_table.html</p> <p>View All the Twitter Messages in Your Account</p>
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<p>Data Portability</p>	<p>Bronto’s customers have a number of tools and techniques that they can use to extract data from the system using common, portable formats (i.e. CSV, TSV, XML, MS Excel).</p>	<p>Export Contact Data https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_export_contact_data_export.html</p> <p>Export Contact Data on a Specific List https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_lists_export_contact_data.html</p> <p>Export Contact Data on a Specific Segment https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_segment_contacts_export_segment_contact_data.html</p> <p>Export Data for contacts Subscribed to an SMS Keyword https://help.bronto.com/bmp/help-source/task/t_bmp_apps_sms_keywords_subscribed_export_data.html</p> <p>Downloaded Report Content https://help.bronto.com/bmp/help-source/reference/r_bmp_new_report_export_content.html</p>

		<p>Download a summary of Detailed Contact Report https://help.bronto.com/bmp/help-source/task/t_bmp_messages_report_download.html</p> <p>Bronto's APIs https://help.bronto.com/bmp/help-source/concept/c_api_overview.html</p> <p>Archive Data Affected by the Data Retention Policy https://help.bronto.com/bmp/help-source/concept/c_bmp_data_retention_permentantly_archive.html</p>
<p>End-user Access and Other Requests</p>	<p>Bronto's customers have a number of ways to end-user requests for access/correction /deletion of individual contact records. In the vast majority of cases, they will be able to use these tools to affect the desired outcome, in other cases, log a Support Request.</p>	<p>Direct Update https://help.bronto.com/bmp/help-source/concept/c_bmp_home_data_exchange_direct_update_about.html?hl=direct%2Cupdate</p> <p>Types of Webforms https://help.bronto.com/bmp/help-source/concept/c_bmp_content_webform_types.html</p> <p>Allow a User to Manage (Create, Edit, and Delete) and View Contacts https://help.bronto.com/bmp/help-source/task/t_bmp_home_users_permissions_user_can_manage_contacts.html</p> <p>Allow a User to create, Edit, and View Fields https://help.bronto.com/bmp/help-source/task/t_bmp_home_users_permissions_create_fields.html</p>

		<p>Delete Contact Fields https://help.bronto.com/bmp/help-source/concept/c_bmp_contacts_import_about.html</p> <p>Delete a List https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_lists_delete.html</p> <p>Add or Update Contacts https://help.bronto.com/bmp/help-source/task/t_bmp_app_data_loader_contacts_add_update.html</p>
<p>Right to Erasure and/or Right to be Forgotten</p>	<p>Bronto can process the Right to be Forgotten requests through the manual deletion process available within the Bronto Marketing Platform. This is the same process a customer would leverage to delete their end-users data. Refer to the section: "Data Deletion at Contract Term or Termination" for further information on deletion processes.</p>	<p>Direct Update https://help.bronto.com/bmp/help-source/concept/c_bmp_home_data_exchange_direct_update_about.html?hl=direct%2Cupdate</p> <p>Types of Webforms https://help.bronto.com/bmp/help-source/concept/c_bmp_content_webform_types.html</p> <p>Allow a User to Manage (Create, Edit, and Delete) and View Contacts https://help.bronto.com/bmp/help-source/task/t_bmp_home_users_permissions_user_can_manage_contacts.html</p> <p>Allow a User to create, Edit, and View Fields https://help.bronto.com/bmp/help-source/task/t_bmp_home_users_permissions_create_fields.html</p>

		<p>Delete Contact Fields https://help.bronto.com/bmp/help-source/concept/c_bmp_contacts_import_about.html</p> <p>Delete a List https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_lists_delete.html</p> <p>Add or Update Contacts https://help.bronto.com/bmp/help-source/task/t_bmp_app_data_loader_contacts_add_update.html</p>
<p>Notice and Consent</p>	<p>Bronto customers are fully responsible for informing the end-user about possible data collection and processing activity, as well as the collection of their explicit consent. Bronto supports a number of features which assist the customer in gathering and managing the explicit consent of end-users for the purposes of marketing. Whether, where, and how these features are used are entirely at the discretion of customers. Appropriate use of these features can allow customers to provide consent, withdraw consent, file complaints, and more.</p>	<p>CAN-SPAM Act https://help.bronto.com/bmp/help-source/concept/c_bmp_canspam_about.html</p> <p>Contact Imports https://help.bronto.com/bmp/help-source/concept/c_bmp_contacts_import_about.html?hl=contact%2Cimport</p> <p>Pop-Up Manager https://help.bronto.com/bmp/help-source/concept/c_bmp_app_popup_about.html</p> <p>Webforms https://help.bronto.com/bmp/help-source/concept/c_bmp_content_webforms_intro.html</p>

		<p>Double Opt-In https://help.bronto.com/bmp/help-source/task/t_bmp_workflow_template_double_optin.html?hl=opt</p> <p>Direct Unsubscribe https://help.bronto.com/bmp/help-source/concept/c_bmp_home_data_exchange_direct_unsubscribe_about.html</p> <p>Direct Import https://help.bronto.com/bmp/help-source/concept/c_bmp_home_data_exchange_direct_import_about.html?hl=direct%2Cimport</p> <p>Set Up Direct Import https://help.bronto.com/bmp/help-source/task/t_bmp_home_data_exchange_direct_import_set_up.html?hl=direct%2Cimport</p> <p>Transactional Emails https://help.bronto.com/bmp/help-source/concept/c_bmp_email_transactional_about.html</p>
<p>Availability</p>	<p>Bronto takes backups of some of that data, which are then shipped offsite weekly (keep 4-5 weeks offsite). Note for the data that is not shipped offsite in this manner, Bronto maintains local snapshots at the data center but does not have offsite backups, so a catastrophic loss of the entire facility would result in a loss of that data.</p> <p>Bronto provides the ability for customers to export data in order to permanently archive it outside of Bronto.</p>	<p>Archive Data Affected by The Data Retention Policy https://help.bronto.com/bmp/help-source/task/t_bmp_home_settings_security_login_set_up.html?hl=ip</p>

<p>Tracking Technologies</p>	<p>Cookies Bronto uses cookies to collect information about contacts in order to help customers personalize marketing campaigns.</p> <p>Bronto supplies our customers with information about the various cookies that have been, or are currently in use, as well as general statements about which areas of functionality depend on the presence of those cookies. With this information, customers should be able to craft a general statement, as well as the possible effects of disabling or restricting those cookies.</p> <p>JavaScript Bronto’s customers will sometimes embed JavaScript on their pages for the purposes of enabling specific types of processing supported by the Bronto product. This typically involves sending markers of end-user activity to Bronto for the purposes of supporting e.g. segmentation, browse/cart/purchase recovery, and recommendation modeling. Customers are necessarily aware of the data being relayed, the purposes of the data, and the potential impact of disabling this communication (e.g. by disabling JavaScript).</p> <p>Email Click-Through Link Tracking Bronto’s customers commonly send transactional or marketing email to their end users. In order to measure the effectiveness of these emails, Bronto injects itself in-between the end-user and their final destination on the customer’s website. This is accomplished through URL re-writing, where Bronto substitutes the customer’s URLs with its own. Bronto’s URL contains tokenized information that allows us to record the end-user’s engagement with a particular piece of communication, and to send that end-user along to their eventual destination.</p>	<p>Tracking URL Parameters https://help.bronto.com/bmp/help-source/concept/c_bmp_home_data_exchange_tracking_url_overview.html</p> <p>When To Use The Tracking URL Parameters https://help.bronto.com/bmp/help-source/concept/c_bmp_home_data_exchange_tracking_url_usage.html</p> <p>Add Tracking URL Parameters Used to Create First-Party Cookies https://help.bronto.com/bmp/help-source/task/t_bmp_home_data_exchange_tracking_url_first_party_cookie.html</p> <p>Create Tracking Cookie For Contacts Added Using An Add Contacts Webform https://help.bronto.com/bmp/help-source/task/t_bmp_content_webform_create_add_contacts_tracking_cookie.html?hl=tracking</p> <p>Bronto Cookies https://help.bronto.com/bmp/help-source/reference/r_bmp_legal_bronto_cookies_about.html?hl=tracking%2CCookies</p> <p>Orders REST API Tracking Attribution https://help.bronto.com/bmp/help-source/concept/c_api_rest_orders_tracking_attribution.html?hl=tracking</p>
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	<p>Google / Omniture / Custom Web Analytics Connection</p> <p>Customers can set up connections between Bronto and 3rd party analytics tools. In order to do this, Bronto will have to append several tracking parameters onto all URLs within the emails sent out to users. Bronto does not receive the analytics information from 3rd parties.</p> <p>Bronto has provided customers with the capability to disable these features as needed. Please note that it is the customer responsibility to manage tracking technologies on behalf of their end-users.</p>	<p>How Bronto Tracks Emails https://help.bronto.com/bmp/help-source/reference/r_bmp_messages_report_email_tracking_about.html?hl=track</p> <p>Google Analytics Connection https://help.bronto.com/bmp/help-source/concept/c_bmp_home_settings_integrations_google_analytics_about.html?hl=google%2Canalytics</p> <p>Using JavaScript Code to Pass Cart and Order Data https://help.bronto.com/bmp/help-source/reference/r_script_cart_capture.html?hl=javascript%2Ctracking</p> <p>Set Up the Omniture Connection https://help.bronto.com/bmp/help-source/task/t_bmp_home_settings_integrations_omniture_set_up.html?hl=tracking</p>
Security Features	Description	Oracle Documentation
Multi-factor authentication	No specific functionality provided by the product/service.	
IP white-listing	Customers who desire additional security or 'factors' can enable an account-wide setting of IP whitelisting, which then forces an additional check on top of that, that the user is coming in from a known IP range (for example corporate office/VPN).	<p>Configure Network Access https://help.bronto.com/bmp/help-source/task/t_bmp_home_settings_network_access_config.html?hl=ip</p> <p>Set Up Login Security https://help.bronto.com/bmp/help-source/task/t_bmp_home_settings_security_login_set_up.html?hl=ip</p>

<p>Separation of duties</p>	<p>Setting user permissions allows users to create a separation of duties within their organization. Available permissions that affect data management and visibility include, but not limited to,</p> <ul style="list-style-type: none"> • Administrator Permissions • Lock Account Permissions • API Permissions 	<p>User Permissions https://help.bronto.com/bmp/help-source/concept/c_bmp_home_users_permissions_about.html?hl=user%2Cpermissions</p> <p>Grant A User Administrator Permissions https://help.bronto.com/bmp/help-source/task/t_bmp_home_users_permissions_grant_admin.html?hl=grant%2Cuser%2Cadministrator%2Cpermissions</p>
<p>Flagging Special Categories of Data</p>	<p>Customers are warned not to enter special categories of personal information in the Bronto Marketing Platform.</p>	<p>Special Categories of Personal Information Warning https://help.bronto.com/bmp/help-source/concept/c_bmp_contacts_fields_page.html</p>
<p>Separate auditing and "detective control" privileges</p>	<p>Bronto maintains an audit log that records major actions taken by users within an account. This facility is primarily used by customers to perform self-service investigations that highlight the source of changes within their data set. This audit-log is visible to anyone with administrative privileges.</p>	<p>View or Export: Audit Log https://help.bronto.com/bmp/help-source/concept/c_bmp_audit_log_intro.html</p> <p>View Contact Details History https://help.bronto.com/bmp/help-source/task/t_bmp_contacts_view_history.html?hl=contact%2Chistory</p> <p>Data Retention Policy https://help.bronto.com/bmp/help-source/concept/c_bmp_data_retention_policy.html</p>
<p>Features Limiting Oracle's access to customer data</p>	<p>A limited set of Bronto employees has 'morph' access within the application. This allows the employee to enter the customers' account as if they were an administrator on that account. This functionality is used primarily to support exotic issues – e.g. bugs that cannot be</p>	<p>Get Support for a Bronto App https://help.bronto.com/bmp/help-source/task/t_bmp_app_get_support_bronto_app.html?hl=support</p>

	<p>reproduced elsewhere via instruction. Obtaining morph access requires several levels of approval, is generally granted for a limited time, and is subject to periodic review by our operations team.</p> <p>Bronto provides limited access to members of technical staff to support development, bug-fixing, and operations. Access is as-needed basis, as defined by an individual's agency within the SDLC. For example, an engineer working on our Channels team might have access to customer data related to the process of rendering and sending mail. This access would be used for break-fixes, monitoring, and other technical support tasks.</p>	<p>Get Support for a Third-Party App https://help.bronto.com/bmp/help-source/task/t_bmp_app_get_support_t_hird_party.html?hl=support</p> <p>Additional Resources https://help.bronto.com/bmp/help-source/concept/c_bmp_help_support_intro.html?hl=support</p>
Encryption	<p>Bronto supports in-transit encryption TLS 1.2 and higher for all publicly routed traffic. In-transit encryption is required for API usage, and for authentication related features. In-transit encryption is at the discretion of the customer for other interactions with the Bronto web application.</p> <p>For privately routed traffic (i.e. 'within Bronto's production network'), in-transit encryption is not generally available.</p> <p>Bronto encrypts data store backups using AES-256. Bronto does not support at-rest encryption for its live, transactional systems.</p> <p>Currently, Bronto uses HTTPS as the default protocol on the web platform.</p>	<p>TLS Support https://help.bronto.com/bmp/help-source/concept/c_api_tls_support.html?hl=tls%2Csupport</p> <p>SSL Certificates, Private Domains, And Webforms https://help.bronto.com/bmp/help-source/concept/c_bmp_private_domain_ssl.html</p> <p>Set Up SSL Certificate Hosting https://help.bronto.com/bmp/help-source/task/t_bmp_set_up_ssl_certificate_hosting.html</p>
Anonymization	No specific functionality provided by the product/service.	
Pseudonymization	No specific functionality provided by the product/service.	

Data Masking	No specific functionality provided by the product/service.	
Truncation	No specific functionality provided by the product/service.	
Tokenization	No specific functionality provided by the product/service.	
Logging	<p>Within Bronto's SaaS offering, distributed, multi-tenant software services generate logs that are of operational interest. These logs are retained on individual hosts for a period not to exceed 7 days. Some logs are centralized and indexed to support operations, and critical diagnostics. Indexed logs are retained for a period not to exceed 60 days. Access to indexed logs are restricted to key principals with operational or critical break-fix responsibilities.</p> <p>Data Retention does affect some of the customer-facing audit/history features (e.g. contact history). Affected data is listed under the documentation for Data Retention Policy.</p>	