



# ForgeRock and your Privacy Law Compliance Obligations

## Introduction

At ForgeRock, our relationships with our customers (**'you/your'**) are built on transparency and mutual trust, and we prioritize your privacy and security compliance obligations (**'compliance obligations'**).

Accordingly, ForgeRock is acutely aware of your privacy compliance obligations connected with using ForgeRock products and services.

We have prepared this document to explain how we can help you satisfy your obligations in the context of 'buying' ForgeRock products.

## We're here to help with your privacy issues

We recognize that your supplier engagement obligations may be complex and time-consuming to manage, so we have attempted to simplify the process for you in the following ways.

### *We make it easy for you to understand how we access and process your end-user data*

We recognize that you are obligated to conduct due diligence on the processing activities we undertake on your end users' personal data for the purposes of providing our cloud services.

Accordingly, we have prepared product-specific data sheets explaining our processing activities via our 'follow-the-sun' service delivery model.

Our product-related data sheets are available [here](#).

### *We provide Transfer Impact Risk Assessments upon request*

We recognize that you are obligated to assess the risk of foreign government access to personal data that we process.

Broadly speaking, our 'follow-the-sun' support model is operated via:

- Internal hubs based in the U.S., UK, EU, Canada, Australia, New Zealand, and Singapore; and
- Sub-Processors predominantly based in the U.S.

**Note:** Sub-Processors are suppliers who may access your end users' personal data for the purposes of service delivery. Other service support suppliers that do not access your end users' data may be classified as Sub-Contractors (rather than Sub-Processors).

Further information is available [here](#).

Accordingly, we have readily available *Transfer Impact Assessments* that we are happy to share upon request. These documents:

- Include legal opinion from external counsel confirming that ForgeRock is neither the type of business nor in a business sector known to be targeted under the governmental national security authorities;
- Confirm that we have never been issued with any government legal request with respect to the provision of our services; and
- Will ensure your compliance with the EU Standard Contractual Clauses that have been modified to reflect the judgement of the Court of Justice of the EU in the *Schrems II* case.

In the event of receiving a data access request, ForgeRock will raise all appropriate and available challenges relating to a) any obligation to produce information, and b) any non-disclosure obligation regarding the existence or substance of the request. In doing so, ForgeRock will always comply with all relevant legal obligations.

## *We provide you with privacy law-compliant data processor terms*

We recognize that you are obligated to impose specific data processing terms on us.

Accordingly, we provide you with global data processing terms that fit around our products and that ensure that you comply with your contracting obligations.

ForgeRock's data processing terms incorporate the new EU Standard Contractual Clauses and the UK Addendum.

### About ForgeRock

ForgeRock®, (NYSE: FORG) is a global leader in digital identity that delivers modern and comprehensive identity and access management solutions for consumers, employees and things to simply and safely access the connected world. Using ForgeRock, more than 1300 global customer organizations orchestrate, manage, and secure the complete lifecycle of identities from dynamic access controls, governance, APIs, and storing authoritative data – consumable in any cloud or hybrid environment. The company is headquartered in San Francisco, California, with offices around the world. For more information and free downloads, visit [www.forgerock.com](http://www.forgerock.com).



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