FACT SHEET

PRIVACY FACT SHEET: AVAYA EXPERIENCE PLATFORM™ PUBLIC CLOUD

Disclaimer: The processing of personal data by Avaya Experience Platform™ Public Cloud (AXP Public Cloud) does not mean (by default) that Avaya (and/or its sub-processors) may have access to such data. Access control and use cases depend on the specific configuration/customization of AXP Public Cloud. This document is an overview of personal data processing activities within AXP Public Cloud, including, but not limiting to, privacy by design built-in tools and controls made available to protect personal data processed within AXP Public Cloud.

1. General Description of Avaya Experience Platform Public Cloud

AXP Public Cloud is a contact-center-as-a-service solution that provides a suite of capabilities to orchestrate, track, interact and report across voice and digital (email, chat and messaging) channels. It is built on an open, API-first architecture leveraging REST based APIs for all capabilities to enable easy customization and integration into an AXP Public Cloud Customer's back/front office ecosystem.

AXP Public Cloud gives organizations the power to:

- Connect digital touchpoints throughout the entire customer journey — from email, messaging, chat, social, and the ability for organizations to Bring Your Own Carrier ("BYO-Carrier"). Regarding data privacy practices within BYO-Carrier, please review stand-alone Privacy Fact Sheet for Avaya Communication APIs.
- Intelligently match End-Users with the best Agents based on business rules, internal and external context and desired business outcomes.
- Personalize Agent experiences with a customizable, modern workspace that easily brings End-User insights from different applications and systems into a single pane of glass.
- Get ahead of every End-User interaction by predicting needs and proactively engaging End-User with journey intelligence.
- Quickly and easily layer-on innovative cloud technologies to deliver the exact experience that provides their End-Users more options, faster responses, and a more personalized approach.
- Supports data sovereignty requirements in countries with local data centers

AXP Public Cloud Capabilities

For more information, please visit avaya.com, review the Service Description and/or Service Catalog (the latter can be provided upon request).

2. Processing of Personal Data within AXP Public Cloud

The table below provides overview of the main personal data categories processed within AXP Public Cloud.

No.	Personal Data Category	General Description and Purpose	Personal Data Examples	Storage Location
1	**Sessions**	Sessions hold context information about the End-User and the communication channel used by the End-User.	A Session entity contains identifiers that an external chat connector provides AXP Public Cloud with, e.g., chat account handle, name, unique user identifier, etc.	Microsoft's Azure datacenter
2	**Engagements**	Engagements constitute a record of a contact initiated by an End-User and handled by contact center resources like Agents, Supervisors and Self-Service applications. A record of the Engagements of an End-User with the contact center is used by Agents to provide better End-User experience. It is also used by a Supervisor to keep track of Agent performance, carry out work assignment and other contact center operations.	An Engagement entity contains identifiers that an external chat connector provides AXP Public Cloud with, e.g., phone number, chat account handle, email, first and last name, unique End-User identifier, etc.	Microsoft's Azure datacenter

3	**End-User Identifiers**	End-User Identifiers are bits of information that allow the contact center applications and Agents to uniquely identify an End-User. During an engagement, these identifiers are used to build a consolidated view (journey) of an End-User's interaction with the contact center across different channels, e.g. voice, chat, async messaging and email.	AXP Public Cloud has some out of the box End-User Identifiers, e.g., email address and Phone number. It allows an AXP Public Cloud Customer to manage identifiers of its choice from the AXP Public Cloud Application Center, e.g., social media handle, employee ID, etc.	Microsoft's Azure datacenter (managed via Aiyen Inc.)
4	**Transcripts and Messages**	An End-User's engagement with AXP Public Cloud results in the exchange of many messages. A Message is the record of an email, text or media sent by an End-User and/ or Agent. Many messages shared during a dialog are consolidated into a Transcript. Transcripts contain End-User identifiers that help associate messages to a rightful End-User. AXP Public Cloud stores the last 50 messages shared during a dialog	The message and / or transcript.	Microsoft's Azure datacenter (managed via Aiven Inc.) and Smooch's datacenter (provisionally)
5	**Call Recordings (i.e., SIP and Media)**	Recording of inbound and outbound voice calls and metadata associated with a call. This is used by Agent / Supervisor for playback and monitoring purposes.	Voice Recording and associated metadata (e.g., phone number, chat handle, email address).	Microsoft's Azure Datacenter or Amazon's AWS Datacenter (managed via Verint Systems Inc.) Google's GCP Data Center, for Avaya Voice Recording
6	**Screen Recordings**	Recording of an Agent and Supervisor's actions on their desktop while an interaction with the End-User is in-progress. This is used by Agent / Supervisor for playback and monitoring purposes.	Screen content and associated metadata (e.g., phone number, chat handle, email address).	Microsoft's Azure Datacenter or Amazon's AWS Datacenter (managed via Verint Systems Inc.)
7	**Reports**	AXP Public Cloud Platform analytics application captures metrics related to Engagements, Agents and quality of service in AXP Public Cloud. This data shows up in real-time and historical Reports.	An engagement's sender and recipient information contain personal data (e.g., phone number, email address, chat handle, etc.). For an email engagement, the subject line is recorded and depending upon how the contact center is configured, it may contain personal data.	Microsoft's Azure datacenter
8	**User Accounts**	Depending upon the role associated, an employee / associate of an AXP Public Cloud Customer assumes personas like Agent, Supervisor and Administrator	AXP Public Cloud user object has the following personal data fields: first name, last name, email address (also used as username) and password	Microsoft's Azure datacenter and Google's GCP datacenter and Verint's datacenter On-premise AXP On-Prem (formerly Avaya Aura Call Center Elite) datacenter for AXP Connect Customers"
9	**Logs**	Avaya Hybrid Cloud Gateway has application and audit logs. AXP Connect uploads logs from On-premise Avaya Hybrid Cloud gateway for AXP Connect Customers to the Cloud for troubleshooting purposes. This only applies if a Customer has selected Hybrid Voice bundle from AXP Connect	A log entry may contain the following End-User personal data: first name, last name, phone number, email address, IP address, etc.	Google's GCP datacenter and On-premise AXP On-Prem (formerly Avaya Aura Call Center Elite) datacenter for AXP Connect Customers

Refer to AXP On-Prem sheet from product website https://www.avaya.com/en/products/experience-platform/on-prem/

Note: the location of datacenters depends on the geographical location where the AXP Public Cloud Customer is based. For further reference please see the tables below:

Datacenter Location (Microsoft's Azure)	Provides AXP Public Cloud services to Customers in
United States of America	Bolivia, Colombia, Costa Rica, Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, Jamaica, Mexico, Panama, Peru, Puerto Rico, United States of America
United Kingdom	United Kingdom, South Africa
Canada	Canada
Germany	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Egypt, Estonia, Finland, France, Germany, Ghana, Greece, Hungary, Iceland, Iraq, Ireland, Israel, Italy, Kenya, Kuwait, Latvia, Lithuania, Luxembourg, Malta, Morocco, Netherlands, Nigeria, Norway, Oman, Poland, Portugal, Qatar, Romania, Saudi Arabia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, United Arab Emirates, Uganda, Ukraine
Brazil	Argentina, Brazil, Chile, Uruguay
Singapore	Cambodia, Hong Kong, Indonesia, Japan, Malaysia, Philippines, Singapore, Sri Lanka, Taiwan, Thailand, Vietnam
Australia	Australia, New Zealand
Japan	Japan

Datacenter Location (Google's GCP)	Provides AXP Public Cloud services to Customers in
United States of America	Bolivia, Colombia, Costa Rica, Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, Jamaica, Mexico, Panama, Peru, Puerto Rico, United States of America
United Kingdom	United Kingdom, South Africa
Canada	Canada
Germany	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Egypt, Estonia, Finland, France, Germany, Ghana, Greece, Hungary, Iceland, Iraq, Ireland, Israel, Italy, Kenya, Kuwait, Latvia, Lithuania, Luxembourg, Malta, Morocco, Netherlands, Nigeria, Norway, Oman, Poland, Portugal, Qatar, Romania, Saudi Arabia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, United Arab Emirates, Uganda, Ukraine
Brazil	Argentina, Brazil, Chile, Uruguay
Singapore	Cambodia, Hong Kong, Indonesia, Japan, Malaysia, Philippines, Singapore, Sri Lanka, Taiwan, Thailand, Vietnam
Australia	Australia, New Zealand
Japan	Japan

Verint Datacenter Location (Microsoft's Azure and Amazon's AWS) Recorder component	Provides AXP Public Cloud services to Customers in
United States of America	Bolivia, Colombia, Costa Rica, Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, Jamaica, Mexico, Panama, Peru, Puerto Rico, United States of America
United Kingdom	United Kingdom, South Africa
Canada	Canada
Germany	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Egypt, Estonia, Finland, France, Germany, Ghana, Greece, Hungary, Iceland, Iraq, Ireland, Israel, Italy, Kenya, Kuwait, Latvia, Lithuania, Luxembourg, Malta, Morocco, Netherlands, Nigeria, Norway, Oman, Poland, Portugal, Qatar, Romania, Saudi Arabia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, United Arab Emirates, Uganda, Ukraine
Brazil	Argentina, Brazil, Chile, Uruguay
Singapore	Cambodia, Hong Kong, Indonesia, Japan, Malaysia, Philippines, Singapore, Sri Lanka, Taiwan, Thailand, Vietnam
Australia	Australia, New Zealand
Japan	Japan

Verint Datacenter Location (Amazon's AWS) Application and Database components	Provides AXP Public Cloud services to Customers in
United States of America	Bolivia, Colombia, Costa Rica, Dominican Republic, Ecuador, El Salvador, Guatemala, Honduras, Jamaica, Mexico, Panama, Peru, Puerto Rico, United States of America
United Kingdom	United Kingdom, South Africa
Canada	Canada
Germany	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Egypt, Estonia, Finland, France, Germany, Ghana, Greece, Hungary, Iceland, Iraq, Ireland, Israel, Italy, Kenya, Kuwait, Latvia, Lithuania, Luxembourg, Malta, Morocco, Netherlands, Nigeria, Norway, Oman, Poland, Portugal, Qatar, Romania, Saudi Arabia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, United Arab Emirates, Uganda, Ukraine
Brazil	Argentina, Brazil, Chile, Uruguay
Singapore	Cambodia, Hong Kong, Indonesia, Japan, Malaysia, Philippines, Singapore, Sri Lanka, Taiwan, Thailand, Vietnam
Australia	Australia, New Zealand
Japan	Japan

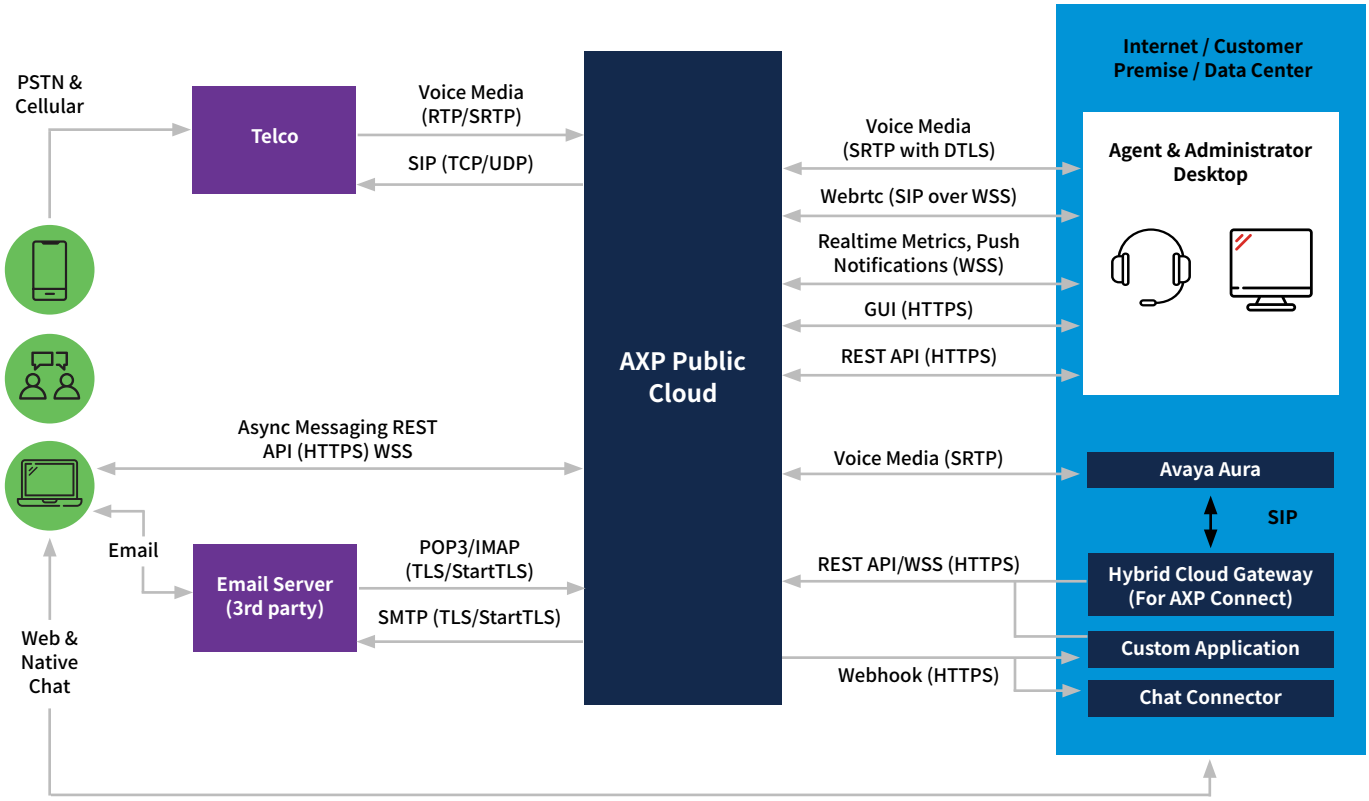
In addition to the above, in countries where data privacy laws and regulations require (Call and/or Screen) Recordings to be stored locally, AXP Public Cloud Customers have the choice to offload such recordings to a Customer's designated (i) storage facility or (ii) proxy cloud location. The foregoing options are custom and require AXP Public Cloud Customers to pay an extra fee to Avaya. The Administrator can create a request to Avaya via Avaya via Avaya OneCare portal to initiate the change of the storage of the (Call and/or Screen) Recordings.

Datacenter Location (Smooch)	Provides AXP Public Cloud services to Customers in
United States of America	USA, Canada, Mexico, Brazil, Argentina, Colombia, Jamaica, Panama
Ireland	Austria, Belgium, Bahrain, Czech Republic, Denmark, France, Germany, Indonesia, Ireland, Japan, Greece, Hungary, Italy, Luxembourg, Malaysia, Nigeria, Netherlands, Norway, Poland, Portugal, Singapore, Spain, Sweden, Switzerland, Saudi Arabia, Turkey, South Africa, Romania, Israel, Kuwait, Qatar, Taiwan, Thailand, UAE, UK

Note: Smooch services are only offered on the countries listed above.

3. Security Overview within AXP Public Cloud

The visual diagram below identifies the interfaces on which authorized users (e.g., Administrators, Agents, Supervisors) and external applications communicate with AXP Public Cloud. The sub-sections following this chart provide more details of the control measures employed by AXP Public Cloud to safeguard AXP Public Cloud Customer's data.



Encryption Controls

- All data at rest is encrypted by default by the cloud service provider (Azure - Microsoft Corporation, GCP – Google Cloud Platform). It uses AES 256-bit encryption.
- Confidential data such as passwords and secrets at rest is additionally encrypted using envelope encryption that employs a combination of AES 256-bit encryption and 2048-bit RSA asymmetric encryption.
- All data in transit over external and internal interfaces is secured using TLS protocol (version 1.2+). This applies to common protocols like HTTPS, WSS, POP3, IMAP and SMTP.
- Voice media is encrypted by default using SRTP and SRTP with DTLS.
- X509 certificates issued by well-known Public CAs secure AXP Public Cloud REST APIs, external interfaces and storage resources hosted by the cloud service provider (Azure - Microsoft Corporation).

Security Controls

- Edge security to protect AXP Public Cloud external interfaces from DDoS attacks, bots, and other malware.
- Web application firewall with OWASP and managed rules sets to protect against existing and new web vulnerabilities.
- REST APIs and web-based portals (Avaya Workspaces Agent Desktop and Application Center) are the only external interfaces. All storage services are inaccessible from the external network. Restrictive network access control policies further limit access between applications and storage services.
- AXP Public Cloud uses cloud service provider's (Azure - Microsoft Corporation, GCP – Google Cloud Platform) recommended tools to manage the security posture and perform a regular threat analysis against its infrastructure.

For more detailed security information, please review the AXP Public Cloud Security Playbook which can be provided upon request to your Avaya sales representative.

4. Personal Data Human (Manual) Access Controls

- AXP Public Cloud leverages Microsoft's Azure automation capabilities to host and manage its resources. Access to these resources is restricted to a small number of Avaya cloud operations engineers.
- Avaya will not access AXP Public Cloud Customer's content data without permission from Avaya Experience Platform Customer and only for specific contractual purposes.
- Access control measures in place include integration with Avaya IDP for SSO and MFA for authentication and RBAC enforced by CSP's IAM solution.
- Users accessing AXP Public Cloud web-based portals (Workspaces Agent Desktop and Application Center) are subjected to OIDC based authentication and RBAC enforced by AXP Public Cloud IAM service.
  - Agents have access to AXP Public Cloud Workspaces Agent Desktop web-based portal. An Agent has access to chats, emails, transcripts, recordings, and engagements. These have personal data like an End-User's first and last name, email address, phone numbers, chat and social media handles, and any other personal data an End-User shares with an Agent during a conversation.
  - Supervisors have access to AXP Public Cloud Workspaces Agent Desktop and Application Center web-based portals. A Supervisor has access to chats, emails, transcripts, recordings, engagements in customer journey, real-time and historical reports. These have personal data like an End-User's first and last name, email address, phone numbers, chat and social media handles and any other personal data an End-User shares with an Agent during a conversation.

Authentication to AXP Public Cloud web-based portals (Avaya Workspaces Agent Desktop and Application Center) can be federated to AXP Public Cloud Customer's Enterprise IDP using SAMLv2.

  - Administrators have access to AXP Public Cloud Application Center web-based portal. They have access to AXP Public Cloud user accounts (e.g., Agent, Supervisor, etc.) and historical reports which have personal data like an End-User's first and last name, email address, phone number, chat and social media handles, and any other personal data an End-User shares with an agent during a conversation. Administrators can create, modify and/or delete Agent and Supervisor accounts.

- Authentication to AXP Public Cloud web-based portals (Avaya Workspaces Agent Desktop and Application Center) can be federated to AXP Public Cloud Customer's Enterprise IDP using SAMLv2.

5. Personal Data Programmatic (API) Access Controls

- AXP Public Cloud uses REST APIs to exchange data with its web-based portals and other authorized external applications. AXP Public Cloud web-based portals (Workspaces Agent Desktop and Application Center) and REST APIs are protected by AXP Public Cloud IAM service that enforces authentication and authorization based on OAuth2 Access Tokens and RBAC.
- Refer to the AXP Public Cloud developer website to learn more about AXP Public Cloud APIs.

6. Personal Data Retention Period Controls

The table below provides personal data retention periods within AXP Public Cloud.

No.	Personal Data Category	Default Retention Period
1	**Sessions**	Up to 24 hours
2	**Engagements**	18 months
3	**End User Identifiers**	18 months
4	**Transcripts and Messages**	18 months
5	**Call Recordings (i.e., SIP and Media)**	90 days
6	**Screen Capture**	90 days
7	**Reports**	9 months
8	**User Accounts**	Until deleted by Administrator
9	**Logs**	7 days

7. Personal Data Export Controls and Procedures

The Administrator can create a request to Avaya via Avaya OneCare portal to export personal data.

Usage Data contains data such as the user's ID (generated by AXP Public Cloud when the user's account is created), login time, logout time and AXP Public Cloud bundle ID (digital/voice/ omni) a user is associated to.

8. Personal Data View, Modify, Delete Controls and Procedures

- Administrators, Supervisors and Agents have (view and/or modify) access to personal data described in Section 2. Access control for these users is implemented through measures set out in Section 4.
- The Administrator can create a service request via Avaya OneCare portal to delete personal data within Engagements, Transcripts, Messages, Call Recordings, Screen Recordings, and Contact Center Metrics. The request must contain one or more identifiers of the End-User whose personal data needs to be deleted.
- Depending on the category of personal data, it will be either deleted or anonymized. Transcripts, Messages and Logs are deleted/purged. End-User Identifiers and personal data within Engagements and metrics collected in analytics application are anonymized.

9. Privacy Features for Recording

A record of End-User's interaction with AXP Public Cloud over digital channels is recorded in Transcripts and Messages.

Controls to start, stop, pause, and resume screen and voice call recording can be customized across a AXP Public Cloud Customer's corporate account level or left down to Agents and/or Supervisors to implement controls. The Administrator can create a request to Avaya support team via Avaya OneCare portal for desired customization.

It is the responsibility of AXP Public Cloud Customer to inform the End-User that a conversation/interaction will be recorded. This may be achieved through automated replies, automated applications, IVRs, manually by an Agent/ Supervisor, etc.

10. Sub-Processors

Please refer to the Avaya Trust Center for information on the sub-processors used to provide AXP Public Cloud.

11. Usage Metering

AXP Public Cloud Customers are billed based on peak concurrent active users or unique named users using the system (users i.e. Agents / Supervisors, etc.). AXP Public Cloud passes the "Usage Data" (as defined below) to Avaya's billing application for processing. Usage Data contains data such as the user's ID (generated by AXP Public Cloud when the user's account is created), login time, logout time and AXP Public Cloud bundle ID (digital/voice/omni) a user is associated to. Avaya will process such data as a Data Controller for billing purposes.

12. Definitions

No.	Full Legal Name	Country of Incorporation
1	**Administrator**	An AXP Public Cloud Customer's employee/associate specializing in contact center management. An Administrator uses AXP Public Cloud Center web-based portal to manage user accounts like Agents, Supervisors, and other contact center features.
2	**Application Center (portal)**	Web-based application for Agents and Supervisors to carry out their responsibility in a contact center.
3	**AES**	Advanced Encryption Standard is a symmetric block cipher used to encrypt sensitive data.
4	**Agent**	An AXP Public Cloud Customer's employee/associate specializing in customer service. An Agent uses Avaya Workspaces Agent Desktop web portal to handle End-User interaction with the contact center.
5	**Avaya Aura Call Center Elite**	AXP On-Prem (formerly Avaya Aura Call Center Elite) is an industry leading Unified Communications and Contact Center platform with flexible deployment options ranging from Enterprise Cloud, managed services, and customer premises.
6	**Avaya Experience Platform**	Cloud-based Contact Center as a Service.
7	**Avaya Experience Platform Connect (AXP Connect)**	A capability offered by AXP Public Cloud that allows customers to utilize the benefits and innovation of Avaya cloud while preserving their existing investments in AXP On-Prem.
8	**Contact Center Metrics**	Metrics related to Engagements, Agents and quality of service in AXP Public Cloud
9	**CSP**	Microsoft Azure is the Cloud Service Provider hosting AXP Public Cloud.
10	**AXP Public Cloud Customer**	An organization that has subscribed to AXP Public Cloud.
11	**DDos**	Distributed Denial of Service is a malicious attempt to disable a service's normal operation.
12	**DTLS**	Datagram Transport Layer Security is a communications protocol that provides security for datagram-based applications by allowing them to communicate in a way that is designed to prevent eavesdropping, tampering, or message forgery.
13	**End-User**	A data subject (likely a client of AXP Public Cloud Customer) interacting with contact center on voice and digital channels.
14	**HTTPS**	Hypertext Transfer Protocol Secure used for secure communication over a computer network.
15	**IAM**	Identity and Access Management service ensuring authorized access to AXP Public Cloud web-based portals, APIs, infrastructure, and platform resources.
16	**IDP**	An Identity Provider is a service that stores and manages digital identities like user accounts and provides mechanism to verify identities through via protocols like SAMLv2.
17	**IMAP**	Internet Message Access Protocol (IMAP) is a protocol used by email clients to retrieve email messages from a mail server.
18	**MFA**	Multi Factor Authentication is an authentication process that requires the user to provide two or more verification factors.
19	**OAuth2**	An industry standard protocol for authorization. Internet Message Access Protocol (IMAP) is a protocol used by email clients to retrieve email messages from a mail server.

20	**OAuth2 Access Token**	OAuth2 Access Token represents the authorization of a specific application to access specific parts of a user's data.
21	**OIDC**	OpenID Connect is a browser-based workflow that standardizes user authentication process with an IDP or IAM service.
22	**OWASP**	Open Web Application Security Project is an online community that produces freely available articles, methodologies, documentation, tools, and technologies in the field of web application security.
23	**POP3**	Post Office Protocol 3 is a protocol used by email clients to retrieve email messages from a mail server.
24	**Public CA**	Public Certificate Authority is a well-known and trusted organization that issues digital certificates.
25	**RBAC**	Role Based Access Control is used in AXP Public Cloud to ensure authorized access to its web-portals, APIs, infrastructure, and platform resources.
26	**REST API**	A REST API is an application programming interface (API) confirming to RESTful architecture style.
27	**RSA**	Rivest, Shamir, and Adleman (RSA) is a public-key cryptosystem that is widely used for secure data transmission.
28	**SAMLv2**	Security Assertion Markup Language 2.0 is a standard for exchanging authentication and authorization information between an IDP and applications that are also called service providers or relying parties.
29	**Self-Service application**	Applications that carry out common and repetitive tasks in a contact center.
30	**SIP**	The Session Initiation Protocol (SIP) is a signaling protocol used for initiating, maintaining, and terminating real-time voice calls in AXP Public Cloud.
31	**SMTP**	Simple Mail Transfer Protocol is a standard protocol for sending emails.
32	**SRTP**	Secure Real-time Transport Protocol is a profile for Real-time Transport Protocol intended to provide encryption, message authentication and integrity, and replay attack protection.
33	**SSO**	Single sign-on is an authentication scheme that allows a user to log-in once and access other trusted services without re-entering authentication factors.
34	**Supervisor**	An AXP Public Cloud Customer's employee/associate specializing in customer service. A Supervisor uses Avaya Workspaces Agent Desktop web-portal to monitor agent performance, resolve complaints and assign work.
35	**TLS**	Transport Layer Security is a cryptographic protocol designed to provide communications security over a computer network.
36	**X509**	X509 is a standard defining the format of public key certificates.
37	**Avaya Workspaces Agent Desktop (portal)**	Web-based application for Agents and Supervisors to carry out their responsibility in a contact center.
38	**WSS**	WebSocket Secure is a computer communications protocol designed over the HTTP protocol, to provide full duplex communication channels.

AXP Public Cloud is built on an open, API- irst architecture leveraging REST based APIs for all capabilities to enable easy customization and integration into an AXP Public Cloud Customer's back/front office ecosystem.

About Avaya

Businesses are built by the experiences they provide, and every day, millions of those experiences are delivered by Avaya. Organizations trust Avaya to provide innovative solutions for some of their most important ambitions and challenges, giving them the freedom to engage their customers and employees in ways that deliver the greatest business benefits.

Avaya contact center and communications solutions power immersive, personalized, and unforgettable customer experiences that drive business momentum. With the freedom to choose their journey, there's no limit to the experiences Avaya customers can create.

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