

Ethics Point: Personal Data Collection & Usage Notice

Ethics Point is a comprehensive and confidential reporting tool operated by Navex Global Inc. ("Navex Global") and provided by Hewlett Packard Enterprise Company and its subsidiaries ("HPE" and "We") to allow people to ask questions and report suspected violations of HPE policies or the HPE Standards of Business Conduct. This notice applies to information HPE collects through the Ethics Point toll-free number or the Ethics Point web form and/or through any follow-up communications HPE has with you.

Ethics Point is optional and complementary to the other HPE mechanisms for reporting suspected violations of HPE policies or the HPE Standard of Business Conduct. The use of Ethics Point is voluntary and there is no consequence if you choose not to use it.

How We Use Your Personal Data

We collect and process the following type of personal data when a report is made through Ethics Point:

- your name, contact details, and your HPE business unit and region (if disclosed);
- your relationship with HPE;
- the name and title of all individuals you may be reporting about;
- the location where the violation occurred;
- a description of any violation you are reporting, including all relevant details;
- any questions you may raise through Ethics Point; and
- any documents or files that support your report which you upload to Ethics Point.

The information you provide will be submitted to the HPE Ethics and Compliance Office. To the extent possible, HPE will review and investigate all reports of unethical conduct and take appropriate action to resolve each reported matter. See the [**Ethics Point FAQs**](#) for more information.

HPE's legal basis for processing your personal data is that the processing is in HPE's legitimate interests. HPE has a legitimate interest in complying with laws which require HPE as a publicly traded company to have a confidential reporting system to address accounting and auditing fraud. HPE also has a legitimate interest in investigating allegations of fraud, abuse and other misconduct in the workplace. If you are in a country that requires consent for the processing of personal data, by submitting a report to Ethics Point you consent to the processing of your personal data by HPE.

Please note that any misuse of Ethics Point could result in disciplinary action. If you misuse Ethics Point you may be liable to disciplinary sanctions and legal proceedings. However, using Ethics Point in good faith, even if the facts you report prove inaccurate or do not result in any action being taken by HPE, will not be subject to any disciplinary sanctions or legal proceedings.

How We Share Personal Data

HPE works with companies that help us run our business. In this instance, this includes Navex Global and a limited number of other companies that may provide us with services such as case management database services. These companies are not permitted to use your information for their own purposes.



HPE may also share your personal information:

- Within the HPE companies (you can find a list of HPE Affiliates [here](#)); or
- When we are required to provide information in response to a subpoena, court order, or other applicable law or legal process.

How We Transfer Personal Data Internationally

Transfers within HPE group of companies. Your personal data will be transferred to our US based systems and may be transferred internationally to other members of the HPE group as necessary to manage suspected violations of HPE policies and the HPE Standards of Business Conduct. The privacy laws in some countries, notably the EU, EEA and Switzerland regulate the transfer of personal to other countries to ensure the data is protected in the recipient country.

HPE has an intra-company agreement on the transfer and processing of personal data within the HPE group of companies. This agreement also forms the basis of HPE's Binding Corporate Rules for Controller (**BCR-C**) which have been approved by the majority of the Data Protection Regulators in the European Economic Area (EEA) and Switzerland. The BCR-C (together with EU Standard Contractual Clauses in some countries) allow HPE to ensure that EEA and Swiss personal data which is transferred and processed by HPE companies outside the EEA or Switzerland, is adequately protected in accordance with applicable data protection laws. If you would like to learn more about our BCRs, please click [here](#).

Transfers to Suppliers. In the case of transfers of your personal data to suppliers located in countries that do not provide an adequate level of data protection under local law, HPE will take appropriate safeguards such as EU Standard Contractual Clauses, an appropriate Privacy Shield certification and/or approved codes of conduct or certification mechanisms or other binding and enforceable commitments of the supplier.

Navex Global and its affiliates process the data in the United States and in various countries throughout the world. Navex Global is certified under the EU-U.S. Privacy Shield.

A copy of the relevant transfer mechanism can be provided to you on request by contacting the [HPE Privacy Office](#).

How Long We Keep Personal Data

HPE collects the minimum amount of data required for the purpose outlined in this notice. Personal data collected through Ethics Point will be deleted or archived according to HPE's data retention policies, or as permitted by local laws. If legal proceedings or disciplinary measures are initiated, personal data can be kept until the conclusion of the proceedings and the period allowed for any appeal. Therefore, such retention periods are determined by local laws.

Additional Information for Individuals in the EU, EEA and Switzerland

Our privacy practices are aligned with the requirements of the General Data Protection Regulation (GDPR). If you are located in the European Union (EU), the European Economic Area (EEA) or Switzerland, this additional information may be relevant and applicable to you.



Data controllers. Companies from the HPE group of companies may act as data controllers in relation to your personal data for the processing of personal data described in this privacy notice. You can find the up-to-date list of the HPE group of companies by clicking [here](#). If you would like to receive more information about which HPE entity acts as data controller for your personal data, please contact the [HPE Privacy Office](#).

Data Protection Officer. HPE has appointed a Data Protection Officer (DPO) to comply with the GDPR. You can contact the DPO by sending an email to the [HPE Privacy Office](#) or in writing to:

Hewlett Packard Enterprise
Office of Legal & Administrative Affairs – ATTENTION PRIVACY OFFICE
Bracknell/Amen Corner B1-2, UK
Cain Rd. Amen Corner (Bldg. BRA02)
Bracknell, RG12 1HN
United Kingdom

Your Rights in Relation to Your Personal Data

You may have the following rights to:

- Request access or copies of personal data HPE processes about you;
- Rectify your personal data, if inaccurate or incomplete;
- Delete your personal data, unless an exception applies. For instance, we may need to keep your personal data to comply with legal obligation;
- Restrict the processing of your personal data, in certain circumstances. For instance, if you contest accuracy of your personal data you may request that we restrict processing of your personal data for the time enabling us to verify the accuracy of your personal data;
- Data portability, in certain circumstances. For instance, you may request us to transmit some of your personal data to another organization if the processing is based on your consent or a contract;
- Object to processing of your personal data, in certain circumstances. For instance, where we process your personal data because we have legitimate interest in doing so.

These rights may be limited in some situations such as where HPE can demonstrate that HPE has a legal requirement or legitimate interest to process your personal data.

For more details on these rights and to exercise your rights please contact the [HPE Privacy Office](#).

Complaint with a supervisory authority. If you consider that the processing of your personal data infringes the GDPR, you have a right to lodge a complaint with a supervisory authority in the country where you live, or work, or where you consider that data protection rules have been breached.

Your rights under HPE Binding Corporate Rules. You may have additional rights under our BCRs. For instance, as a third party beneficiary, where you believe your personal data has been transferred to an HPE company located outside the EU and processed by that company in breach of the BCR, you may have a right to:

- Lodge a complaint with the EU HPE company which transferred your personal data outside the EU;



- Lodge a complaint with a supervisory authority located in the same country as the EU HPE company which transferred your data outside the EU;
- Bring a court action against the EU HPE company which transferred your personal data outside the EU.

For further information, please visit the HPE BCR web page available [here](#).

How To Contact Us

If you have any questions about this notice or the processing of your personal data, please contact the [HPE Privacy Office](#). If you have unresolved concerns, you also have the right to complain to data protection authorities in the country where you live or where you consider that data protection rules have been breached.