

Dell's Commitment to GDPR Compliance

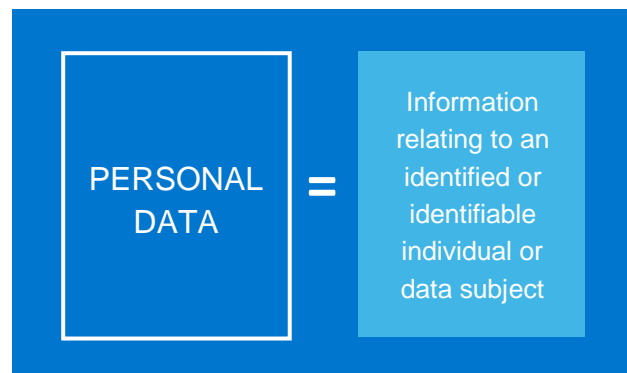
Dell Corporate Legal, Privacy Organization

What is GDPR?

The [General Data Protection Regulation](#) ("GDPR") is an European Union ("EU") law, effective 25 May 2018, establishing a single set of rules to ensure the protection of EU residents' personal data. It builds upon and updates the previous EU data protection framework. Under the GDPR, companies processing personal data must continue to ensure they have proper controls over the processing and security of personal data, according to the GDPR data protection principles, and to ensure that they effectively manage and record how personal data is stored, kept up to date, accessed, transferred and deleted.

We are confident that your personal data is protected

We continue our long commitment to protecting the personal data that we process on our own behalf and on behalf of our customers and partners. We remain committed to our privacy compliance obligations to the individuals, whose personal data is processed in the course of providing our products and services or otherwise operating our business. Our strong [Global Privacy Program](#) provides the foundation for protecting personal data worldwide and includes a dedicated privacy team of experienced certified privacy professionals and attorneys, led by our [Chief Privacy Officer](#).



In addition, all Dell team members are responsible for protection of personal data and may only use personal data for authorized purposes. The [Dell Technologies Code of Conduct and Privacy Statement](#) clarifies our commitment to protecting the privacy of our customer's personal information. Because each Dell team member plays a vital role in protection of personal data, all Dell team members annually undergo a specifically tailored [Privacy and Code of Conduct training](#).

Our Global Privacy Program, together with our security policies, provide confidence that personal data, including personal data received from the European Economic Area (EEA) will be adequately protected when entrusted.

Our best-in-class privacy programs to meet GDPR requirements include:



Privacy by Design

We design privacy into our products, services, and solutions from inception. Our dedicated privacy team works extensively with Dell business units to facilitate and guide the integration of privacy from the earliest phases of a product, service, and solution.



Privacy Impact Assessment Program

We use a highly developed privacy risk management program to ensure processes highlighting Privacy by Design and efficient privacy risk management are ingrained across the company.



Supplier Compliance Oversight Program

Our Supplier Compliance Oversight Program is designed to ensure appropriate handling of personal data with controls and processes that augment the contractual commitments Dell requires of each supplier handling personal data.



Contractual Assurances

We provide privacy related assurances which includes implementing appropriate technical and organizational measures to keep personal data secure.



International Data Transfer

As a large international organization, we often need to make international transfers of personal data. Our global privacy program ensures that we meet global data transfer requirements using approved mechanisms.

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Incident Response and Data Security

We manage a mature global incident response program that engages key Dell business unit partners for prompt, effective investigation, and remediation of any incident.



Training

We provide regular training across the company on the care, security, and appropriate handling of personal data, enabling employees to understand their responsibility to uphold customer trust and comply with Dell policies and local regulations.