

Dell's Commitment to Compliance with the General Data Protection Regulation (GDPR)



What is the GDPR?

The General Data Protection Regulation (GDPR) is a new law, effective 25 May 2018, that establishes a single set of rules for every European Union (EU) Member State to protect personal data. It builds upon and updates the current 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 data protection principles in the GDPR. They must continue to control how data is stored, kept up to date, accessed, transferred and deleted.



Personal Data = Information relating to an identified or identifiable individual or data subject

We are confident your personal data is protected

We continue our long commitment to protecting personal data we hold on our own behalf and on behalf of our customers. 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 privacy attorneys, led by our Chief Privacy Officer. Together with our Chief Privacy Officer, our executive level global regulatory compliance council oversees our privacy compliance and risk mitigation efforts. In addition, all Dell team members are responsible for protection of personal data and may only use personal data for authorized purposes.

Our Global Privacy Program, together with our security policies, provide confidence that personal data, including personal data received from the European Union, the European Economic Area and Switzerland, will be adequately protected when entrusted to Dell.

We are making enhancements to programs and building new features to meet GDPR

At Dell, we are building on existing programs and adding new features where appropriate to ensure we are prepared to meet the requirements of the GDPR when they come into force. Our cross-departmental effort includes multiple workstreams aligned with each category of compliance expectations in the GDPR. Each workstream operates against a detailed work plan with deadlines set to ensure each Dell business unit will be ready to meet GDPR compliance requirements by the law's effective date.

Several features in our global program are already best-in-class. These are detailed on the back.



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

Privacy By Design

We design our products/services/solutions to comply with applicable privacy laws and regulations, including the GDPR. Our dedicated privacy team works extensively with Dell business units to provide appropriate subject matter expertise throughout the development process.

Privacy Impact Assessment Program

We use a highly-developed PIA program to assess and mitigate privacy risk associated with new or changing uses of personal data across all relevant business units. A team of privacy managers conduct in-depth assessments and engage internal privacy attorneys to enhance recommendations when appropriate.

Supplier Compliance Oversight Program

Our robust Supplier Compliance Oversight Program annually reviews data protection, security and data privacy performance of a sizeable percentage of vendors that handle personal data, determined each year based on level of risk. This program is designed to ensure protection of personal data with rigorous controls and processes that augment the contractual commitments Dell requires of each vendor handling personal data.

International Data Transfer

Our Global Privacy Program is designed to meet global data transfer requirements, including EU data transfer requirements, using approved data transfer mechanisms. This program uses the EU-approved Standard Contractual Clauses (also called Model Clauses) as its approved data transfer mechanism to protect personal data leaving the European Union. We pass on these requirements to vendors handling personal data received from the European Union on our behalf, and all non-EU vendors must agree to the Model Clauses as part of the Data Protection Agreement that all vendors handling personal data must sign.

Incident Response and Data Security

We manage a mature global incident response program that engages appropriate data privacy, security and other company experts for prompt, effective investigation and remediation of any incident. Our dedicated professional Cybersecurity team leads our data security efforts, establishing and overseeing the guidance, processes, resources and IT vendors we need to protect our customer's personal data and information from unwanted access and cyberattacks.

Training

We provide regular required training for all team members on the care, security and appropriate handling of personal data. In addition, we provide additional targeted training on specific data protection and privacy practices to employees whose roles frequently require handling of customer or other personal data.