HP Privacy Philosophy

For HP, Privacy is about trust

• Our philosophy is based on three key factors:
  • Transparency
  • Choice
  • An ability for data subjects to modify that choice where appropriate

• HP’s Privacy Strategy is based on:
  • Anticipate Change
  • Build an Accountability Based Program
  • Measure Compliance
  • Be a Thought Leader and a Trusted Advisor to Regulators
  • Enhanced reputation
  • Responsible business enabler
Global Privacy Laws

[Bar chart showing comparison of privacy laws across Americas, Europe, and Asia-Pacific regions.]
Global Privacy Laws

HP Policy
Global Shift to Accountability

We are seeing a dramatic change on the part of regulator expectations

<table>
<thead>
<tr>
<th>LIABILITY</th>
<th>ACCOUNTABILITY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Decisions are made based on technical compliance with local laws and regulations</td>
<td></td>
</tr>
<tr>
<td>• Focuses on the minimum standard</td>
<td></td>
</tr>
<tr>
<td>• What is legally defensible</td>
<td></td>
</tr>
<tr>
<td>• Mechanical compliance processes</td>
<td></td>
</tr>
<tr>
<td>Decisions are additionally made based on considering concurrent risks and a set of ethics- &amp; value-based criteria beyond liability</td>
<td></td>
</tr>
<tr>
<td>• Tie to social and/or company values (ethics)</td>
<td></td>
</tr>
<tr>
<td>• All employees responsible for stewardship of data under their charge (accountability)</td>
<td></td>
</tr>
<tr>
<td>• Demonstrate solid judgment in decisions (risk/harms)</td>
<td></td>
</tr>
</tbody>
</table>
HP’s Privacy Program

Demonstrate capacity to internal stakeholders (Management, Internal Audit, Board)

Demonstrate capacity to external stakeholders (Trust Agents, Regulators)

Demonstrate capacity to individual data subjects

Commitment
- Solid policies aligned to external criteria
- Management commitment
- Full transparency

Implementation
- Mechanisms to ensure policies and commitments are put into effect with employees

Validation
- Monitoring and assurance programs that validate both coverage and effectiveness of implementation

Oversight
Identify Risks and Opportunities

Effective Approach
Integrated Governance

Demonstration

HP Confidential – Ethics & Compliance Office 2015
Privacy Rulebook

• To comply with existing Laws, Regulations and Guidelines issued by Data Protection Authorities (DPA), HP has incorporated these requirements into an internal Rulebook.

• The Rulebook Follows the following structure:
  • Policies
  • Standards
  • Specifications
Privacy Policies

- Master Privacy Policy
- Privacy Notice
- Employee Privacy Policy
Privacy Standards

<table>
<thead>
<tr>
<th>Employee</th>
<th>Customer</th>
<th>Outsourcing Client</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Data Collection</td>
<td>• Data Collection</td>
<td>• Client Owned Personal Data Standard</td>
</tr>
<tr>
<td>• Data Sharing / Transfer</td>
<td>• Customer Contact</td>
<td></td>
</tr>
<tr>
<td>• Data Handling / Protection</td>
<td>• Data Sharing / Transfer</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Data Handling / Protection</td>
<td></td>
</tr>
</tbody>
</table>
Privacy Specifications

• Data Collection and Storage
• Customer Contact
• Data Sharing/Transmission/Transfer
• Data Handling/Protection
• Client-Owned Personal Data
• Employee Privacy
ESTÁNDARES – Un Par de Ejemplos
HP Privacy Advisor

The HP Privacy Advisor (HPBA) has been designed as a means to identify privacy risks and compliance issues associated with collecting and handling of customer or employee information while supporting HP's business need to build and deploy products, services, marketing initiatives or other activities. In addition to meeting HP's privacy policies, standards and specifications the HPBA also takes into account ethical considerations, contractual agreements, regulations and local culture and guides decisions that are aligned to company values, customer expectations and potential risks.

Next Steps

- To begin an assessment or to seek guidance for your project or activity click "Begin Assessment" or "Obtain Guidance" buttons below or from the left menu.
- To see a list of your projects or activities click "List Projects" buttons below or from the left menu.

What is an Assessment?
What is Guidance?
Stats and Measures

FY14 Consultations/Guidance

• In FY14, Privacy conducted and closed 2,148 consultations:

  FY14 Consultations by Type

  - Account 8%
  - Business Unit 12%
  - Employee 16%
  - Sales 3%
  - External Engagement 2%
  - General 14%
  - Internal System & Processes 1%
  - ES Data Flows 17%
  - Marketing 0%
  - Other 8%
  - Internal System & Processes 1%

  Consultations by Level

  - Level 1: Simple
  - Level 2: Medium
  - Level 3: Complex

  FY14 Consultations/Guidance

  - Q1: 298
  - Q2: 331
  - Q3: 277
  - Q4: 279
Our Strategic Tools

Centralized Planning and Operations

• **Operations**
  - Privacy Plan Of Record / Metrics
  - Privacy Standards and Specifications
  - Privacy Policy Management
  - Risk Acceptance
  - Privacy Assurance
  - Privacy Incident management
  - Privacy & Data Protection Board
TRAINING

HP Deploys a mandatory yearly Privacy training for all employees
Some additional specialized training is done for specific functions:

• Human Resources
• Legal
• Health Services (HIPAA)
• Etc.
Current Focus of the Privacy Team

About 50% of time is spent on consultations

Key tasks that link to our philosophy, obligations and expectations of a responsible program

- Governance/Oversight
- Policy and Standards Management
- Risk Assessment & Mitigation
- Consulting
- Contracts/Deal Support
- Advisor Tool/Training/Education
- Audit/Assurance
- External Thought Leadership/Public Policy/Sensing
- Major Projects
- Privacy Mailbox/Metrics
- Administration (documentation, required reporting, etc.)