

GDPR Accountability Statement

Dell Inc., which includes its subsidiaries such as RSA, Boomi, Virtustream and DellEMC (“Dell”) have a comprehensive global privacy program which includes policies, procedures, standards and controls so that it complies with all global privacy laws and regulations including the GDPR (EU’s General Data Protection Regulation). This program is managed by a global privacy team, led by the company’s Chief Privacy Officer and supported by resources in other organizations such as marketing, procurement, information management, information technology and global audit. The dedicated privacy team has senior resources aligned by each business and functional organization to monitor the program’s effectiveness. The program also includes privacy professionals to specifically monitor EU related activity.

Whether acting as a controller or processor, Dell’s comprehensive program includes, but is not limited to:

- **Data Governance:** We have a mature data governance program that includes GDPR.
- **Data Mapping:** We have mapped the data flows through our organization.
- **Data Subject Rights:** We give effect to data subject rights under GDPR and will assist customers with their data subject requests (to the extent applicable).
- **Incident Response:** We have a mature incident response program to deal with data breaches.
- **International Data Transfers:** We have a data transfer solution for transferring personal data out of the EEA.
- **Notice and Consent, and Cookie Management:** We are transparent about our data processing practices and provide notice and, collect consent where appropriate. We provide individuals with a means to manage their cookies consent.

- **Privacy Impact Assessment (and DPIAs):** We conduct PIAs and DPIAs when required to assess the impact that processing activities may have on individuals.
- **Privacy By Design and Default:** We ensure that privacy principles under GDPR are designed into products services and applications.
- **Third Party Management:** We have processes in place to manage the selection and use of third parties.
- **Security of Data:** We implement appropriate security and organizational technical measures to keep data secure.
- **Recordkeeping:** We maintain a record of our data processing activities.
- **Training and Awareness:** We train our team members on their data protection responsibilities under GDPR.

For additional information about Dell’s GDPR compliance program, please contact Dell’s Privacy Office at privacy@dell.com