

CONSIDER ARUBA YOUR GDPR COMPLIANT BUSINESS PARTNER

ARUBA AND PRIVACY

Aruba, a Hewlett Packard Enterprise company, respects the privacy of our customers, employees, partners and other stakeholders. Ensuring privacy is a core value at Aruba and is integral to the way we do business. We are committed to accountability and seek to maintain a robust privacy program globally.

ARUBA'S APPROACH TO THE GDPR

Aruba recognizes the importance of the General Data Privacy Regulation ("GDPR") and the significance of changes that it brings to us and our customers and partners. Privacy, data protection and security are at the core of our business. As a data processor, it is our key objective to ensure that our customers consider Aruba a GDPR compliant business partner. To achieve this, Aruba has invested a substantial amount of time and resources to meet the new GDPR standards from the 25th May 2018.

Our products are end-to-end, and thus, our approach covers the full data lifecycle, which include: collection, processing, use, and disposal of personal data. We process personal data on behalf of customers and provide the means for our customers to collect and process personal data themselves. We take seriously our responsibility to ensure that any data we hold is accurate, used appropriately and kept secure by complying with internal privacy policies, applicable laws, and contractual commitments.

ARUBA'S GDPR COMPLIANCE PROGRAM

As part of this effort Aruba established a GDPR Compliance Program in 2016, which is overseen by a Program Management Office led by the Chief Privacy Officer, and has driven, among others, the following initiatives:

1. Privacy impact and compliance assessments have been conducted across Aruba's products (i) analyzing and addressing the impact of the GDPR on Aruba's data processing activities, (ii) enhancing Aruba's global privacy and data protection compliance program to meet the GDPR's new requirements, and (iii) identifying products, or the features of our products, that may assist our customers with GDPR compliance when they deploy them.
2. Records of processing activities have been prepared for all main data processing activities to ensure compliance with the GDPR and assist customers, where needed, by providing information relating to the processing of customers' data.
3. Data privacy and security data sheets for Aruba products have been developed and are available for customers and partners. Those data sheet identify the: (i) products functionalities and performance, (ii) customer personal data processed, (iii) data subjects to whom the personal data pertain, (iv) scope of the processing activities, (v) security and encryption features, and (vi) certifications.

4. New data privacy and security terms for customers, partners and suppliers have been developed to address GDPR's requirements.
5. Aruba subcontractors with the ability to sub-process customers' personal data have been identified, and their identity and processing locations will be available for Aruba customers.
6. Aruba has developed a security incident response process that includes industry-wide best practices, knowledge of and adherence to applicable legal requirements in the event of data loss, and communication plans geared toward limiting risk exposure.
7. Privacy by design methodology has been developed and is followed by Aruba for any new product, solution and/or business operation that involves processing of personal data.
8. GDPR trainings have been provided to Aruba staff.
9. Aruba has defined legal basis to transfer internationally personal data controlled by customers. In particular, EU personal data controlled by customers are transferred by Aruba outside the EEA based on EU Standard Contractual Clauses. Going forward, Aruba will rely on the Binding Corporate Rules for Processor to transfer EU personal data as part of its support services.

CUSTOMER COMMUNICATIONS

Further information about Aruba and GDPR could be found at <http://www.arubanetworks.com/gdpr>.

For additional inquiries related to data privacy or security, please contact your business representative.



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