

PRIVACY DATA SHEET

SUPPLEMENTS THE HPE DATA PRIVACY AND SECURITY AGREEMENT SCHEDULE

	ARUBA WORKPLACE INSIGHTS
Aruba* performs the following services:	In addition to Aruba Meridian’s standard services under the Aruba Meridian Schedule , the Workplace Insights tool can also provide space utilization and contact tracing insights for an indoor area. This is accomplished by using Meridian asset tracking in connection with the Workplace Insights tool and Aruba Tags carried by humans or attached to other objects or spaces. The Workplace Insights tool will provide a web-based dashboard which allows customers to perform queries and view data for the purpose of contact tracing for a limited time period. While Meridian asset tracking services are hosted through Google’s Cloud Platform, the information collected from the Workplace Insights tool is hosted in Amazon Web Services (AWS).
Customer Personal Data:	Customer Personal Data collected by the Workplace Insights tool mirrors the underlying Meridian service. This data includes: <ul style="list-style-type: none"> • The asset tag MAC address • The X,Y location of the asset tag at specific times as calculated by Meridian • In addition, the data may include other personally identifiable information if entered into the system by the Customer <p>Specific location data for an asset tag is retained for 21 days.</p>
Data subjects to whom Customer Personal Data pertains are:	Customer’s client / end-user / employee / contractor and temporary worker / visitor
With respect to Customer Personal Data, Customer is acting as:	Controller
Aruba shall process Customer Personal Data only as follows:	Aruba will have access to Customer Personal Data in Workplace Insights tool as part of support and maintenance services.

*Aruba, a Hewlett Packard Enterprise company, is referred throughout this document as Aruba

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Security and Encryption:	<p>Access security features:</p> <p>The Workplace Insights tool provides additional access controls based on a user login and password mechanism so that only specific individuals have access to perform their job functions.</p> <p>Technical Security features:</p> <p>The Workplace Insights tool uses the HTTPS protocol and TLS 1.2 to transmit data and stores access credentials for space utilization and contact tracing functions in an encrypted format.</p> <p>Aruba Security features:</p> <p>Aruba implements and maintains technical and organizational security measures to protect Customer Personal Data against accidental or unlawful destruction or loss, alteration, and unauthorized disclosure or access.</p> <p>Hosting Security:</p> <p>Amazon Web Services</p> <p>Amazon Web Services implements and maintains the physical and technical security measures: https://aws.amazon.com/security/</p> <p>All Workplace Insights tool data is maintained in AWS's US West region S3 service.</p>
Privacy Considerations Specific to Proximity Tracking:	<p>Privacy Considerations if using Proximity Tracking Feature:</p> <ul style="list-style-type: none"> • Before implementing a contact tracing solution based on the location tracking of individuals, it is recommended that your organization conduct a privacy impact assessment to ensure the solution is implemented in compliance with applicable privacy laws. In particular, your organization may need to: <ol style="list-style-type: none"> (i) establish a legal basis for the processing of personal data for the purpose of contact tracing; (ii) provide a new or updated privacy notice to individuals to meet transparency requirements and inform them of their rights; (iii) collect and manage consents from individuals; or (iv) consult with employee representatives or Works Councils. • Further, if your organization collects and uses sensitive personal data (e.g. health related information) as part of a contact tracing solution, additional privacy requirements may apply. <p>For additional information about how Aruba solutions processes information, please see https://www.arubanetworks.com/gdpr/</p>
Privacy-Specific Certifications:	None

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