

HP Inc. EU Binding Corporate Rules (Controller & Processor)

February 2024

[Public Version](#)



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1 Introduction

HP recognizes the importance of privacy as a basic human right. We have developed a data protection program to ensure respect for privacy throughout all aspects of our operations. We comply with privacy and data protection laws around the world and apply the highest possible global standards to ensure consistent protection for our customers in jurisdictions with minimal or no data protection laws.

HP's commitment to privacy and data protection was recognized in 2011 when HP's Binding Corporate Rules for Data Controller were approved by European Economic Area ("EEA") regulators and recognized by the Swiss regulator, permitting HP to transfer the Personal Data of HP Employees and consumers outside of the EEA. In 2018, EEA regulators again recognized HP's commitment to privacy and data protection by approving a set of Binding Corporate Rules for Data Processor that apply when HP is processing data on behalf of a Controller (referred to as "HP Customer").

HP EU Binding Corporate Rules for Data Controller ("HP EU BCR for Controller") and HP EU Binding Corporate Rules Data Processor ("HP EU BCR for Processor") respectively (referred to as "HP EU BCR" throughout the document), set the minimum standards for protection and transfer of Personal Data by the HP Entities that are bound by the HP EU BCR (referred to as "HP EU BCR Entities").

The Data Protection Authority competent for the supervision of the HP EU BCR is the Commission Nationale de l'Informatique et des Libertés ("CNIL"). Data Subjects have the right to lodge a complaint with the CNIL if they believe that the HP EU BCR have been breached.

The list of countries where the HP Entities bound by the HP EU BCR are located can be found in Appendix 1 (also available [here](#)), or provided upon request.

Please see the Glossary in Appendix 2 for definitions of capitalized terms. References to "process or processing" mean to include any operation or set of operations which is performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment, combination, restriction, erasure or destruction.

2 Summary of the EU HP BCR

The HP EU BCR consist of HP's corporate policies, privacy standards and specifications, commitments to training and assurance, and Data Subject enforcement rights. HP EU BCR applies in the following situations:

- [HP as Data Controller](#) - HP EU BCR for Controller apply when HP processes Personal Data from consumers, vendors, business partners, business contacts, current and former HP Employees, and job applicants as a Data Controller.
- [HP as a Data Processor](#) - HP EU BCR for Processor apply when HP processes Personal Data on behalf of a Data Controller. This could include the Personal Data of the Data Controller's employees or customers.

The EU HP BCR are made binding through two Intercompany Agreements on the Processing and Transfer of Personal Data ("Intercompany Agreement(s)"). An updated list of all HP BCR Entities that have executed the Intercompany Agreements and are consequently bound by the EU HP BCR can be found [here](#), or provided upon request. To request a copy, please submit a request through our [HP Chief Privacy and Data Protection Officer form](#) by selecting the option "Privacy/data protection question", and then selecting "International Data Transfers".

Furthermore, all HP Employees are bound by the HP EU BCR through HP's internal "Integrity at HP" program and HP policies, standards, and specifications applicable to the collection and processing of Personal Data.

Contingent workers must follow HP's privacy and data protection policies, standards, and specifications, as well as any external compliance codes of conduct or standards (including but not limited to HP's Global Master Privacy Policy, HP's Binding Corporate Rules, or any other Privacy compliance framework). This is required when conducting HP business and in using online and offline systems, processes, products, and services that involve the use, storage, or transmission of any personal data from HP customers, business partners, HP Employees, and other individuals. Corrective action will be decided in line with the HP Supplier Code of Conduct by the respective employers of contingent workers.

Where local law requires a higher standard of data protection than HP EU BCR, local law takes precedence over the HP EU BCR.

If the Data Subject is an HP Employee, the Data Subject shall visit the Trust and Privacy Organization's intranet site for additional details regarding HP's processing of HP Employee data in accordance with data protection law.

3. Scope of the HP EU BCR

HP EU BCR are based on HP's accountability-based privacy and data protection program which focuses on the fundamental principles set forth in this section. Where HP's obligations differ depending on its role as a Data Controller versus a Data Processor, such distinctions are noted.

3.1 Lawfulness & Fairness

HP only processes Personal Data fairly and in accordance with law. HP carefully takes into account the reasonable expectations of a Data Subject whenever it processes their Personal Data.

Data Controller

As a Data Controller, HP primarily processes Personal Data based on the following legal bases:

- **Consent** - Data Subjects have unambiguously given consent.
- **Contract Performance** - Processing is necessary for the performance of a contract to which a Data Subject is a party to or in order to take steps at the request of the Data Subject prior to entering into a contract.
- **Required by Law** - Processing is necessary for compliance with a legal obligation.
- **Legitimate Interests** - Processing is necessary for the purposes of the legitimate interests pursued by HP, except where such interests are overridden by the fundamental rights and freedoms of the Data Subject.

Moreover, HP recognizes that additional care is required to justify the processing of any Special Category Data and, therefore, HP is prohibited from processing Special Category Data unless one of the following applies:

- **Consent** - Data Subjects have given explicit consent to the processing of Sensitive Category Data.
- **Legal Obligations** - Processing is necessary for the purposes of carrying out HP obligations and rights in the field of employment and social security and social protection law in so far as it is authorized by national law providing for adequate safeguards.
- **Vital Interests** - Processing is necessary to protect the vital interests of the Data Subject or of another person.
- **Publicly Available** - Processing relates to Special Category Data which are manifestly made public by the Data Subject.
- **Legal Claims** - The processing of Special Category Data is necessary for the establishment, exercise or defense of legal claims.
- **Public Interest** - The processing is necessary for reasons of substantial public interest based on local law.

HP only processes Personal Data relating to criminal convictions and offences, or related security measures, if it is permitted or required by laws and regulations providing for adequate safeguards as required by law.

Data Processor

When HP processes data on behalf of a HP Customer, it is the responsibility of the HP Customer to ensure that any such processing is based on the appropriate legal grounds. HP will only process Personal Data in accordance with the instructions provided by the HP Customer.

3.2 Transparency & Notice

Data Controller

HP operates transparently and provides clear notice to Data Subjects about the identity of the Data Controller, purposes of processing, categories of Personal Data collected, recipients of the Personal Data and other information as required by law. HP also provides Data Subjects with choices about what information can be collected and how that information can be used.

Data Processor

HP shall provide reasonable help and assistance to the HP Customer to comply with the principles of transparency, fairness and lawfulness.

3.3 Purpose Limitation

HP abides by the principle of purpose limitation and only uses Personal Data for the purposes described at the time of collection or strictly in accordance with instructions from the Data Controller.

Data Controller

When acting as a Data Controller, HP only uses Personal Data for the purposes described at the time of collection or for additional compatible purposes in accordance with law. Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is collected. HP has implemented “Privacy by Design” which requires that all HP systems, services, applications and products be designed and implemented with privacy in mind. As part of the Privacy by Design process, HP carefully reviews the purposes for which Personal Data is to be collected to ensure that our data collection supports reasonable business requirements and is proportionate to our needs. HP will not use Personal Data for purposes that are incompatible with the notices provided to or the choices made by Data Subjects.

Data Processor

HP processes Personal Data on behalf the HP Customer only for the purposes of delivering our services and in compliance with:

- the terms of the relevant agreement between HP and the HP Customer, including, those relating to the security, confidentiality and any processing instructions of the HP Customer;
- any other documented processing instructions between the HP Customer and HP;
- all applicable HP privacy policies;
- EU HP BCR; and

- all local data protection and privacy laws applicable to HP.

3.4 Data Quality and Storage Limitation

HP respects the principle of data quality and takes steps to ensure that the Personal Data it processes is up-to-date and accurate.

Data Controller

When acting as a Data Controller, HP takes reasonable steps to ensure that Personal Data is accurate, complete and current. HP also only keeps Personal Data in a form which permits the identification of Data Subjects for only as long as is necessary for the purposes for which it is collected. Personal Data that it is no longer necessary or that HP is no longer legally required to maintain is securely deleted or destroyed.

Data Processor

When processing Personal Data on behalf of a HP Customer, HP will take steps to update, correct or delete Personal Data in accordance with the HP's Customer's direction. HP retains Personal Data only to the extent that provision of service is necessary to the HP Customer, unless otherwise instructed by the HP Customer or required by law. Upon instruction from the HP's Customer, HP complies by either deleting, destroying or facilitating the return of the Personal Data to the HP Customer depending on the nature of the instruction, unless required to retain the Personal Data for compliance with applicable law.

3.5 Data Security & Data Breach Notification

HP is committed to the highest standards of protection of Personal Data. Accordingly, HP implements a robust set of information security controls including policies, practices, procedures, and organizational structures to protect the confidentiality, integrity and availability of Personal Data. HP's security controls are intended to protect against physical, organizational, and logical threats and include measures to address the following:

- Security Policy
- Information Security Organization
- Asset Management
- Access Control
- Personnel Training
- Third Parties and Subcontractors
- Systems Security
- Physical and Environmental Security
- Operations Management
- Cryptography
- Information Security Incident Management
- Business Continuity Management

To learn more about HP's Security Measures, click [here](#).

Data Controller

When acting as a Data Controller, HP implements appropriate technical and organizational measures to protect against unauthorized or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data. These measures are appropriate to the harm which might result from any unauthorized or unlawful processing, accidental loss, destruction, damage or theft of Personal Data and having regard to the nature of the Personal Data which is to be protected. In addition, HP takes into account the state of the art and the costs of implementation of such technical and organizational measures. HP also extends its security requirements to third-party service providers that process Personal Data on behalf of HP.

In the event of an actual or suspected personal data breach involving Personal Data, HP follows the appropriate incident management and breach notification processes. These processes include requirements for HP to:

- Keep records of all Personal Data incidents;
- Notify Data Subjects of personal data breaches affecting Personal Data where the breach is likely to result in a high risk to the Data Subject; and
- Notify incidents affecting Personal Data to the Supervisory Authority where required.

Data Processor

With regard to HP's activities as a Data Processor, HP complies with its legal obligations by implementing security measures that are suitable to the nature of the Personal Data and processing activities undertaken on behalf of the HP Customer, along with the potential harm that might come to the Data Subject. Furthermore, HP implements any additional security measures required by the HP Customer and set forth in the service agreement governing HP's services. To the extent that any HP security measures exceed the legal minimums, or the requirements set by the HP Customer, HP always implements the more protective measures.

If HP becomes aware of any actual or suspected security incident involving the Personal Data, HP will notify the HP Customer without undue delay. HP will also cooperate with the HP Customer to remedy the security incident and provide information necessary for the HP Customer to satisfy its breach notification obligations.

HP shall assist the HP Customer in meeting its obligations under data protection law with respect to security, privacy by design and privacy by default, security incidents and data protection impact assessments.

3.6 Automated Decision Making

Data Subjects have the right not to be subject to a decision which is based solely on automated processing to evaluate personal aspects of the Data Subject and: 1) results in legal effects concerning the Data Subject; or 2) otherwise significantly affects the Data Subject. The only circumstances in which HP can make automated processing decisions is if the decision is based on one of the following:

- **Consent** – The Data Subject has provided their explicit consent.
- **Contract Performance** – The decision is taken in the course of entering into or the performance of a contract between HP and the Data Subject, provided the request for the entering into or the performance of the contract was made by the Data Subject.

- [Authorized by Law](#) – Local law permits such decisions and includes measures to safeguard the Data Subject’s legitimate interests.

3.7 Appointing Data Processors and Onward Transfers

In all cases, HP will only engage a Data Processor (whether another HP BCR Entity or a third party, including sub-processors) to process Personal Data if it is permitted to do so by applicable HP policy and the Data Processor is able to provide sufficient guarantees of compliance with applicable privacy and data protection laws.

Data Controller

Where a HP BCR Entity is acting as a Data Controller, before transferring the data to any other HP BCR Entities for processing, the HP BCR Entity acting as a Data Processor must agree to comply with the obligations set forth in the applicable Intercompany Agreement. The obligations contained in the Intercompany Agreement serve as the binding written agreement that satisfies Article 28 of the EU General Data Protection Regulation. In other words, within the HP group of entities, Personal Data can only be transferred between HP BCR Entities that are parties to the applicable Intercompany Agreement.

When transferring Personal Data outside of the HP group to a third-party Data Controller, HP will ensure that the Personal Data is adequately protected by complying with applicable privacy and data protection laws.

With regard to transfers to third-party Data Processors, HP only transfers Personal Data to third-party Data Processors located in Adequate Third Countries or in accordance with the following legal mechanism:

- EU Standard Contractual Clauses

In all cases of onward transfer to third parties, HP shall ensure that it enters into a written agreement with the third party which contains provisions no less protective than those set out in HP EU BCR (including the requirements of Article 28 of the GDPR where the third party is a Data Processor).

Data Processor

When acting as a Data Processor, an HP BCR Entity will not transfer to or permit another HP BCR Entity to act as a sub-processor or to have access to or process Personal Data unless: 1) that company is a signatory to the appropriate Intercompany Agreement; and 2) HP has provided the proper notification and obtained the prior written consent of HP Customer.

Similarly, when HP transfers Personal Data to a third-party sub-processor, it shall only do so if it has provided the appropriate notice and obtained the necessary authorizations from its HP Customers. In addition, HP will only transfer data to third-party sub-processors in accordance with the legal mechanisms set forth above and with a written agreement in place that contains terms no less protective than those set out in HP’s contract with its customer and shall contain adequate protection for the transfer of any Personal Data to a non-Adequate Third Country, in accordance with data protection law.

HP shall provide notice to HP Customer of any replacements to such sub-processors (with a right to object). HP is responsible for the acts and omissions of any HP or third-party sub-processors and remains fully liable for the acts and omissions of the sub-processors and remains fully liable for any breach of HP EU BCR that may arise from such acts and omissions.

4 HP's Commitments

Central to the HP EU BCR are HP's commitments to maintain a robust corporate framework for privacy and data protection. These commitments include:

4.1 Governance

The HP's Trust and Privacy Organization is led by the Chief Privacy Officer, who reports to HP's Legal Organization. The Data Protection Officer regularly reports to HP's Board of Directors through the Audit Committee. The Trust and Privacy Organization is chartered to ensure compliance with applicable privacy and data protection laws and is responsible for overseeing compliance with HP EU BCR.

4.2 Training

HP Employee training is critical for ensuring the protection of Personal Data. In addition to general privacy training required for all HP Employees, HP has implemented role-based training programs that cover, among other things: risks to data; security measures to prevent dangerous events; data protection principles according to the law and HP policies; and HP Employee responsibilities. HP also has specialized trainings to address the compliance obligations under its HP EU BCR.

The HP's Trust and Privacy Organization develops and refreshes trainings on an ongoing basis using a variety of resources and materials. Depending on business needs, risk assessment outcomes, assurance processes and other factors, the HP's Trust and Privacy Organization may develop additional role-based and/or mandatory trainings.

4.3 Compliance Assurance

The HP's Trust and Privacy Organization is responsible for the implementation of HP's Privacy Assurance program. This program is designed to assess internal compliance with HP's internal privacy policies, standards, specifications, and HP EU BCR. Through this program, HP identifies potential compliance gaps and tracks and mitigates risks. The program covers all business units and functions that collect, use, access, or store Personal Data. The results of any internal assessment shall be communicated to the appropriate stakeholders.

The HP EU BCR is subject to an annual audit during which the HP's Trust and Privacy Organization will ensure that Personal Data is being protected and HP BCR Entities are acting in compliance with their obligations under the HP EU BCR.

HP also monitors compliance through third-party certifications, dispute-resolution mechanisms and robust monitoring of Data Subject complaints and feedback.

4.4 Cooperation

HP shall cooperate with any Data Subjects, HP Customers and Competent Supervisory Authorities to verify HP's compliance with its HP EU BCR, answer any questions or respond to any complaints relating to the processing of Personal Data in accordance with its HP EU BCR.

4.5 Honoring Data Subject Rights

Data Controller

HP will honour Data Subject rights under applicable data protection laws and will seek to accommodate the rights in a clear and transparent manner without undue delay, unless applicable law permits or requires HP to deny the rights. This includes the Data Subject's:

- **Right to Access** – Data Subjects have the right to ask HP for a copy of any personal data that they have provided to HP or that HP maintains about them.
- **Right to Be Informed** – Data Subjects have the right to request an explanation about the processing, which will detail the categories of personal data, the categories of sources from which the personal data is collected, the purposes for collecting or sharing personal data, the categories of third parties to whom HP discloses personal data, and the specific pieces of personal data HP has collected about them.
- **Right to Portability** – Data Subjects have the right to obtain the personal data they provide with their consent or in connection with a contract in a structured, machine-readable format and ask HP to transfer it to another data controller.
- **Right to Rectification** – Data Subjects have the right to request from HP to update, amend, correct, or rectify their personal data.
- **Right to Erasure** – Under certain circumstances, Data Subjects have the right to request deletion or destruction of their personal data (for example, the personal data is no longer needed in relation to the purposes for which they were originally collected).
- **Right to Restriction of Processing** – Under certain limited circumstances when legally provided, Data Subjects have the right to restrict the processing of their personal data. This means that the data will not be actively used for the original purpose, but will be maintained to exercise HP's legitimate rights.
- **Right to Withdrawal of Consent** – Data Subjects have the right to withdraw their consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to Object** – Data Subjects have the right to object to the processing of their personal data in some circumstances, including when HP is using their personal data for direct marketing or to create a marketing profile. Data Subjects can see the HP Communications Section of the HP Global Privacy Statement for guidance on how to exercise their rights and to manage their preferences for marketing and subscription communications. In some cases, they may also have the right to object, at any time, to processing personal data under the grounds of legitimate interests.
- **Right to Object Automated Decision-Making and Profiling** – In case the Data Subject is: a) subject to a decision based solely on automated processing, including profiling, b) which produces legal effects concerning them or significantly affects them and, c) the processing is based either on explicit consent or the performance of a contract; the Data Subject will have the right to obtain human intervention to express their point of view and to contest the decision.
- **Right to lodge a Complaint with the Data Protection Authority** – Data Subjects can contact the EEA supervisory authority in the country where they live or work, or in the EEA country of any alleged infringement. A full list of EEA data protection authorities is available [here](#) and the Swiss data protection authority is available [here](#).

These rights may be limited in some situations under applicable law. The means to exercise these rights are described in section 5.1.

Data Processor

HP will notify HP Customers if they receive a Data Subject request relating to the Personal Data that HP is processing on behalf of its HP Customer. HP will cooperate with its HP Customers in responding to requests by Data Subjects to exercise their rights.

5 Submitting a Complaint and Enforcing the HP EU BCR

HP recognizes that where Personal Data has not been processed in accordance with its HP EU BCR, Data Subjects may also have the right to seek redress by filing a complaint with HP or filing a complaint or seeking redress from a Relevant Supervisory Authority or Court. The following sets forth how a Data Subject can file a complaint or seek to enforce HP EU BCR.

5.1 HP's Complaint Handling Process

Data Controller

HP has implemented a complaint management process and applies consistent incident management procedures from identification through to resolution. Complaints relating to HP EU BCR can be submitted through the following mechanisms:

- Online - Complaints can be submitted via the [“HP Chief Privacy and Data Protection Officer” form](#).
- Postal Mail - Complaints can be sent to HP via mail service at the addresses listed in [HP Global Privacy Statement](#) or [Personal Data Rights Notice](#).
- Telephone - Complaints can be reported via telephone using the local number provided in the [Personal Data Rights Notice](#).

HP Employees as Data Subjects can contact HP Human Resources via myHR on the HP intranet site. Job applicants or former HP Employees can complain to HP EU BCR Entities by using the mail service at the addresses listed in [HP Global Privacy Statement](#) or [Personal Data Rights Notice](#) or by submitting the request through the [HP Chief Privacy and Data Protection Officer form](#).

Upon receipt, the HP's Trust and Privacy Organization will review the submission and take action to honor requests, investigate complaints and/or respond to inquiries. HP will acknowledge receipt of a complaint within ten business days and will respond to all submissions (whether the complaint is rejected or accepted) without undue delay and in any event within one month of receipt (which may be extended to two months if the request(s) are complex or numerous). The HP's Trust and Privacy Organization will make sure that any corrective actions are taken to deal with the matters raised in the complaint.

Data Processor

Complaints to the HP EU BCR Entities or queries relating to HP EU BCR can be submitted through the following mechanism:

- Online – Complaints can be submitted via the [HP Chief Privacy and Data Protection Officer form](#).

Data Subject whose personal data is being processed by HP as Data Processor shall select the option “Privacy/data protection question”, and then select “International Data Transfers”.

HP Customers can contact HP through the same channel for queries or complaints regarding HP EU BCR for Processors by selecting the option “Controller using HP as Processor”, and then selecting “Privacy/data protection question” or “Privacy/data protection complaint”.

Where HP is processing Personal Data on behalf of a HP Customer, HP strongly encourages Data Subjects to submit their request or complaint directly to the HP Customer, who will instruct HP on necessary actions. If HP receives a request or complaint directly from the Data Subject, it shall promptly notify its HP Customer and comply with any subsequent requests by the HP Customer in support of its efforts to respond to the request or complaint. If HP Customer is a Data Processor, HP will inform the HP Customer and, if directed, also inform the HP Customer.

If the HP Customer is no longer in existence, then HP will respond directly to the Data Subject.

5.2 Complaint Escalation

If the Data Subject is not satisfied with HP’s response, they have the right to seek redress by: 1) filing a complaint with a Supervisory Authority; and 2) seeking a judicial remedy in court. It is important to note, however, that at any time, individuals may seek redress with the Relevant Supervisory Authority or Court without first filing a complaint with HP or exhausting the HP Complaint Handling Process. HP is committed to working with the Relevant Supervisory Authorities or Court to resolve any complaints filed alleging non-compliance with HP EU BCR.

5.3 Third-Party Enforcement Rights

HP recognizes that data protection laws contain remedies for Data Subjects that give them the right to lodge complaints, obtain redress and, where appropriate, seek compensation where HP or its third-party sub-processors fail to process Personal Data in accordance with the HP EU BCR. HP Customers and Data Subjects are entitled to full access of the sections of HP EU BCR as they apply to third-party beneficiary rights, namely the following:

- Part IV, Section 1 of the Intercompany Agreement on the Processing and Transfer Personal Data
- Sections 4 and 5 of the Intercompany Agreement on the Processing and Transfer of HP Customer-Owned Personal Data within the HP Group.

Requests for access can be submitted by contacting us through the [HP Chief Privacy and Data Protection Officer form](#).

Data Controller

In situations where HP acts as a Data Controller, Data Subjects can enforce their rights as third-party beneficiaries in relation to a breach by either the HP BCR Entity acting as the Data Importer or the BCR HP Entity acting as the Data Exporter. In such cases, the HP BCR Entity that acted as the Data Exporter shall accept liability for such breach as if it had arisen from its own act or omission.

Data Processor

If HP, when acting as a Data Processor, processes Personal Data in breach of its HP EU BCR, HP Customer has the right as a third-party beneficiary to enforce the HP EU BCR and lodge a complaint or bring a claim

for compensation for damages against HP with the applicable Supervisory Authorities or courts. Where the breach is caused by the HP BCR Entity acting as the Data Importer or a third-party sub-processor of an HP BCR Entity, HP Customers have the right to enforce the BCR against the HP BCR entity acting as the Data Exporter or HP's pre-designated EU entity.

In addition, where the HP Customer ceases to exist, Data Subjects also have the right as third-party beneficiaries to HP EU BCR to file complaints or to bring a claim for compensation for damages against HP's pre-designated EU Entity, which shall accept liability for such breach as if it had arisen from its own act or omission.

To request additional information regarding the rights of HP customers or information regarding HP's pre-designated EU entity, against which complaints may be lodged, please submit your request to the [HP Chief Privacy and Data Protection Officer form](#).

In the event that the Data Subject is not able to bring a claim against the HP Customer, or the laws of the Data Subject's place of residence or establishment do not allow the Data Subject to bring such a claim, the Data Subject may exercise his or her rights to seek remedies or lodge a complaint in:

- the jurisdiction of the HP Entity acting as Data Exporter from which the data transfer originated; or
- the jurisdiction of the European headquarters of the HP Group; or
- the EU Member State in which the HP Group's designated entity for data protection responsibilities is established, namely the Netherlands.

6 HP EU BCR Entities

A complete list of all territories and countries in which HP Entities bound by HP EU BCR operate can be found in Appendix 1. Changes or updates to this list will be posted [here](#).

7 Updates to HP EU BCR

HP EU BCR may be updated, amended or modified from time-to-time. Any such updates shall be notified to HP BCR Entities which shall have an opportunity to object to any such changes.

Data Controller

HP will ensure that significant amendments are communicated to Data Subjects via email, posting on an internal website or public website (available [here](#)) or, or other such method. HP will also provide notice of any substantial changes to the Commission Nationale de l'Informatique et des Libertés (“CNIL”) on an annual basis. Where a modification would affect the level of the protection offered by the BCR, such changes shall be promptly communicated to the CNIL.

Data Processor

Where amendments will affect data processing conditions, HP will notify its HP Customers in a timely fashion such that the commercial customer has the possibility to object or to terminate the agreement covering the provision of our services before the amendment is made or the termination becomes effective.

HP will provide notice of significant changes to the CNIL on an annual basis.

8 Conflicts of Law

Data Controller

Where local laws may prevent HP from complying with its obligations under the HP EU BCR or have a substantial impact on the guarantees provided by the HP EU BCR, HP will involve the Competent Supervisory Authority. Where HP considers that the matter would have a substantial adverse effect on the guarantees provided by the HP EU BCR, it will report the matter to the Competent Supervisory Authority as required to settle the case in collaboration with appropriate government authorities. This includes any legally-binding requests for disclosure of the Personal Data of an EU Data Subject by a law enforcement or state security body.

If HP is prohibited by law or a law enforcement authority from disclosing such matters, HP will use commercially reasonable efforts to obtain a right to waive such prohibition and be in a position to provide as much information as possible to the CNIL and any other Competent Supervisory Authority and if requested by the Competent Supervisory Authority, provide information to demonstrate what actions it has taken under this section (unless this would be prohibited by secrecy requirements).

If, despite having used commercially reasonable efforts, the HP is unable to lawfully notify the CNIL and any other Competent Supervisory Authority it shall, on an annual basis, publish general information on the requests received by HP.

HP shall ensure that any disclosures made to law enforcement authorities or state security bodies in response to a request shall be made in accordance with applicable data protection laws.

Data Processor

When HP is acting as a Data Processor, upon receipt of a legally binding request for disclosure of Personal Data by a law enforcement authority or a state security body, HP will notify the HP Customer unless prohibited from doing so, for example, as the result of a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation.

Where the request relates to Personal Data, and where HP is not prohibited from doing so, on a case-by-case basis, HP will assess whether to notify the Competent Supervisory Authority and provide details of the requestor, the Personal Data requested and the legal basis for the disclosure by HP.

Where HP is prohibited disclosing the request, it shall use commercially reasonable efforts to obtain a right to waive such prohibition and be in a position to provide as much information as possible to its HP Customer and/or the Competent Supervisory Authority.

If, despite having used commercially reasonable efforts, HP is unable to lawfully provide such notifications, on an annual basis, HP will publish general information on the requests received by HP for Personal Data.

9 Updates to this HP EU BCR Public Version

We will adjust our EU BCR Public Version to reflect any changes made to the HP EU BCR. We will specify the date on which this document was last reviewed and the dates and reasons for any changes [here](#).

10 Contact Information

Questions relating to the HP EU BCR should be sent to the HP's Trust and Privacy Organization through the [HP Chief Privacy and Data Protection Officer form](#).

Appendix 1 HP Entities Covered by the HP EU BCR

Country	Entity	Address
Argentina	HP Inc Argentina S.R.L.	3616 Vedia Street, 7th Floor, City of Buenos Aires, Argentina
Australia	HP PPS Australia Pty Ltd	Rhodes Corporate Park, Building F, Level 5, 1 Homebush Bay Drive, Rhodes, NSW 2138, Australia
	Tower Software Engineering Pty Ltd	Rhodes Corporate Park, Building F, Level 5, 1 Homebush Bay Drive, Rhodes, NSW 2138, Australia
Austria	HP Austria GmbH	Technologiestraße 5, Gebäude F, Wien, 1120, Austria
Belgium	HP Belgium BV	Hermeslaan 1, Building B, 1831 Diegem, Diegem, Belgium
Brazil	HP Brasil Indústria e Comércio de Equipamentos Eletrônicos Ltda	Alameda Xingu 350, 8th and 9th floors, Alphaville Industrial, Barueri, São Paulo, 06455-030, Brazil
Bulgaria	HP Inc. Bulgaria EOOD	Business Park Sofia, build 10, Sofia 1766, Bulgaria
Canada	HP Canada Co. HP Canada Cie	1300-1969 Upper Water Street, Purdy's Wharf Tower II, Halifax, NS, B3J 3R7, Canada
	HP Canada Development Co.	600-1741 Lower Water Street, Halifax, NS, B3J 0J2, Canada
	HP Canada Licensing L.P.	5150 Spectrum Way, Suite #600, Mississauga, ON, L4W 5G2, Canada
Chile	HP Inc Chile Comercial Limitada	Mariano Sánchez Fontecilla, 310, Piso 13, Las Condes, Santiago, CP 7550296, Chile
China	HP (Chongqing) Co., Ltd	22, Xi Yuan Yi Road, Xi Yong Village, Sha Ping Ba District, Chongqing, China
	HP (Chongqing) Manufacturing, Export, Procurement and Settlement Co., Ltd	Building 6, No. 3 Zong Bao Avenue, Sha Ping Ba District, Chongqing, China
	HP Information Technology R&D (Shanghai) Co., Ltd	Room 203-C, No. 26 Jia Feng Road, Pilot Free Trade Zone, Shanghai, China
	China HP Co., Ltd.	No.8 Guang Shun Avenue South, Bldg. 1, 5th Floor, ChaoYang District, Beijing, P.C. 100102, China
	HP Trading (Shanghai) Co. Ltd.	Room 203-A, No. 26 Jia Feng Road, Pilot Free Trade Zone, Shanghai, China

	HP Supply Chain Management (Shandong) Co., Ltd	Jinzhou Road No.29, Weihai Hi-Tech. IDZ, Shandong Province, China
	HP Trading Kunshan Co., Ltd.	Room 107, No.1, The Third Avenue, Kunshan Development Zone, China
Colombia	HP Colombia SAS	Carrera 11B, No. 99-25, Piso 14, Bogotá, 110221, Colombia
Costa Rica	HP Inc Costa Rica Limitada	San Francisco de Heredia, seiscientos metros al norte de Plaza Real Cariari, calle Rusia, exactamente en Zona Franca América, Edificio C-Diez, Heredia, Costa Rica
	HP PPS Costa Rica Limitada	Centro Comercial City Place, Edificio B, piso tres Local cincuenta y tres, San Jose, Costa Rica
Croatia	HP Computing and Printing d.o.o. (Zagreb)	Radnička cesta 41/V, Zagreb, 10000, Croatia
Czech Republic	HP Inc Czech Republic s.r.o.	Za Brumlovkou 1559/5, Michle, 140 00 Praha 4, Czech Republic
Denmark	HP Inc Danmark ApS	8 Engholm Parkvej, 3450 Allerød, Denmark
Finland	HP Finland Oy	Piispankalliontie, 02200 Espoo, Finland
France	HP France SAS	14, Rue de la Verrerie, Meudon Campus Bat 1, Meudon, 92190, France
Germany	HP Deutschland GmbH	140, Herrenberg Strabe, Boblingen, 71034
	HP Health Solutions Germany GmbH	Am Klopferspitz 19, Planegg/Martinsried, D-82152, Germany
Greece	HP Συστήματα Εκτύπωσης και Προσωπικών Υπολογιστών Ελλάς ΕΠΕ (HP Printing and Personal Systems Hellas EPE)	1-3, Tzavella Street, 2nd Floor, Chalandri, Athens, 15232, Greece
Hong Kong	HP Inc AP Hong Kong Limited	Suites 2501 to 2506 and 2515 to 2516 and Part of Suite 2507 on 25th Floor, No. 1111 King's Road, Taikoo Shing, Hong Kong
	HP Inc Hong Kong Limited	Suites 2501 to 2506 and 2515 to 2516 and Part of Suite 2507 on 25th Floor, No. 1111 King's Road, Taikoo Shing, Hong Kong
Hungary	HP Inc Magyarország Kft.	Nepfurdo utca 22. B. ép.13 em, Budapest, 1138, Hungary
India	HP India Sales Private Limited	24 Salarpuria Arena, Hosur Main Road, Adugodi, Bangalore, 560-030, India
	HP Computing and Printing Systems India Private Limited	24 Salarpuria Arena, Hosur Main Road, Adugodi, Bangalore, 560-030, India
	HP PPS India Operations Private Limited	24 Salarpuria Arena, Hosur Main Road, Adugodi, Bangalore, 560-030, India

	HP PPS Services India Private Limited	24 Salarpuria Arena, Hosur Main Road, Adugodi, Bangalore, 560-030, India
Indonesia	PT Hewlett-Packard Indonesia	Gedung Perkantoran Prudential Centre Kota Kasablanka Lantai 9, Jl. Casablanca Kav. 88, Kel. Menteng Dalam, Kec. Tebet, Kota Administrasi Jakarta Selatan 12870, DKI JAKARTA, 12870, Indonesia
Ireland	HP Technology Ireland Limited	Liffey Valley Office Campus, 1st Floor, Block B, Dublin, D22 XOY3, Ireland
	HP Production Company Limited	Liffey Valley Office Campus, 1st Floor, Block B, Dublin, D22 XOY3, Ireland
Israel	HP Indigo Ltd	10 Einstein Street, Nes Ziona, 7403662, Israel
	HP Israel Ltd	8B Hatzoran Street, Netanya Industrial Park, Netanya, 4250608, Israel
	HP Scitex Ltd	8B Hatzoran Street, P.O. Box 8743, Netanya Industrial Park, 4250608 Netanya, Israel
Italy	HP Italy S.r.l.	Via Donat Cattin, 5, Cernusco Sul Naviglio (MI), 20063, Italy
Japan	Hewlett-Packard G.K.	Shinagawa Season Terrace, 2-70 Konan 1-chome, Minato-ku, Tokyo, Japan
	HP Japan Inc.	Shinagawa Season Terrace, 2-70 Konan 1-chome, Minato-ku, Tokyo, Japan
	Nihon HP Nin-I Kumiai	75, Parc d'Activités Capellen, L-8308 Capellen, The Grand Duchy of Luxembourg, L-8308
South Korea	HP Korea Inc.	83 Uisadangaero, Youngdeungpo-gu, 14-15th Fl, Seoul, Korea (the Republic of)
	HP Printing Korea Co., Ltd.	26, Yeonnaegaeul-ro, Sujeong-gu, Seongnam-si, Gyeonggi-do, Korea (the Republic of)
Luxembourg	HP Luxembourg S.C.A.	Vegacenter, 75, Parc d'Activités Capellen, L - 8308 Capellen, Luxembourg
Malaysia	HP Malaysia Manufacturing Sdn. Bhd.	Suite 13.03, 13th Floor, Menara Tan & tan, 207 Jalan Tan Razak, Kuala Lumpur, 50400, Malaysia
	HP PPS Malaysia Sdn. Bhd.	Suite 13.03, 13th Floor, Menara Tan & tan, 207 Jalan Tan Razak, Kuala Lumpur, 50400, Malaysia
	HP PPS Sales Sdn. Bhd.	Suite 13.03, 13th Floor, Menara Tan & tan, 207 Jalan Tan Razak, Kuala Lumpur, 50400, Malaysia
Mexico	Computing and Printing Global Services Mexico, S. de R.L. de C.V.	Ave. Javier Barros Sierra 495, floor 11 y 10, Colonia Santa Fe, Alcaldía Alvaro Obregon, Mexico City, C.P. 01376

	Computing and Printing Mexico, S. de R.L. de C.V.	Ave. Javier Barros Sierra 495, floor 11 y 10, Colonia Santa Fe, Alcaldía Alvaro Obregon, Mexico City, C.P, 01376
Morocco	HP PPS Maroc	numéro 5, 4ème étage, Illot A5, Immeuble 5, Crystal I, Casablanca Marina, Boulevard des Almohades, Casablanca, Morocco
Netherlands	HP Indigo B.V.	Krijgsman 75, Amstelveen, 1186DR, Netherlands
	HP Global Trading B.V.	Krijgsman 75, Amstelveen, 1186DR, Netherlands
	HP International Trading B.V.	Krijgsman 75, Amstelveen, 1186DR, Netherlands
	HP Nederland B.V.	Krijgsman 75, Amstelveen, 1186DR, Netherlands
	HP Europe B.V.	Krijgsman 75, Amstelveen, 1186DR, Netherlands
	Perseus Holding B.V.	Krijgsman 75, Amstelveen, 1186DR, Netherlands
	Regor Holding B.V.	Krijgsman 75, Amstelveen, 1186DR, Netherlands
New Zealand	HP New Zealand	KPMG, 18 Viaduct Harbour Avenue, Auckland, 1010, New Zealand
Nigeria	HP Computing and Printing Nigeria Ltd	7th Floor, 21 Lugard Avenue, Ikoyi, Lagos, Nigeria
Norway	HP Norge AS	Rolfsbuktveien 4, (P.O. Box 344, 1326 Lysaker), 1364 Fornebu, Norway
Panama	HP Panama Sales and Distribution, S. de R.L.	Randolph Ave, Manzana 10 Lote 869, Zona Libre do Colon, Colon, 0302-00122, Panama
Peru	HP Inc Peru S.R.L.	Calle Las Begonias 415, Torre Begonias, Piso 14, San Isidro, Lima, 15046, Peru
Philippines	HP PPS Philippines Inc.	37th Floor, Robinson's Summit Center, 6783 Ayala Avenue, Makati City, Philippines
Poland	HP Inc Polska sp. z o.o.	ul. Szturmowa 2A, 02-678 Warszawa, Poland
Portugal	HPCP – Computing and Printing Portugal, Unipessoal, Lda.	Edifício D. Sancho I Quinta da Fonte, Lisboa Concelho, Porto Salvo, 2740-244, Portugal
Puerto Rico	HP Puerto Rico LLC	Metro Office Park, Parque 7, Street 1 Suite 204, Guaynabo, 00968, Puerto Rico
Romania	HP Inc Romania SRL	5 Fabrica de Glucoza Street, Novo F building, floors P and 8, 2nd District, Bucharest, 0203371, Romania
Saudi Arabia	HP KSA Ltd.	Al Khaiyria Bldg. King Fahad Highway, North Tower, 14th Floor, P.O. Box 295163 – Riyadh 11351, Riyadh, Saudi Arabia
	HP Middle East and North Africa RHQ	Al Khaiyria Bldg. King Fahad Highway, North Tower, 14th Floor, P.O. Box 295163 – Riyadh 11351, Riyadh, Saudi Arabia

Serbia	HP Computing and Printing d.o.o. (Beograd)	Omladinskih brigada 90B, 11070 Belgrade, Serbia
Singapore	HP International Pte. Ltd.	1 Depot Close, Singapore 109841, Singapore
	HP Singapore (Private) Limited	1 Depot Close, Singapore 109841, Singapore
	HP PPS Asia Pacific Pte. Ltd.	1 Depot Close, Singapore 109841, Singapore
	HP PPS Singapore (Sales) Pte. Ltd.	1 Depot Close, Singapore 109841, Singapore
	HP R&D Singapore Pte. Ltd.	1 Depot Close, Singapore 109841, Singapore
	HP Singapore Services Pte. Ltd.	1, Depot Close, Singapore, 109841, Singapore
Slovakia	HP Inc Slovakia, s.r.o.	Galvaniho 7, 820 02 Bratislava, Slovakia
South Africa	HP South Africa Proprietary Limited	12 Autumn Street, Rivonia, 2128 Sandton, South Africa
Spain	HP Printing and Computing Solutions, S.L.U.	Calle José Echegaray, No. 18, Parque Empresarial, Las Rozas, Madrid, 28232, Spain
	HP Solutions Creation and Development Services S.L.U.	Calle José Echegaray, No. 18, Parque Empresarial, Las Rozas, Madrid, 28232, Spain
Sweden	HP PPS Sverige AB	Gustav IIIs boulevard 30, Solna, 169 73, Sweden
Switzerland	HP Europe BV, Amsterdam, Meyrin Branch	Route du Nant-d'Avril 150, Meyrin, CH, 1217, Switzerland
	HP International Sàrl	150 Route du Nant-d'Avril, 1217 Meyrin 2, Geneva, Switzerland
	HP Schweiz GmbH	99, Glatt Tower, Neue Winterthurerstrasse, Wallisellen, 8304, Switzerland
Taiwan	HP Taiwan Information Technology Ltd.	10F, No. 66, Jing Mao 2nd Rd., Nangang Dist. Taipei City 115, Taipei, 11568, Taiwan (Province of China)
Thailand	HP Inc (Thailand) Ltd.	968,U-Chu-Liang Building, 3rd Floor, Rama IV Road, Silom Subdistrict, Bangrak District, Bangkok, Thailand
Tunisia	HP Inc Tunisie SARL	Zone Industrielle Chotrana Technopole Elgazala - LOT 45, Ariana, 2088
Turkey	HP Bilgisayar ve Baskı Teknolojileri Limited Şirketi	Saray Mahallesi Dr Adnan Büyükdeniz Cad. No 4, Akkom Ofis Park 2. Blok Kat:8, Ümraniye Istanbul, 34768, Turkey
United Arab Emirates	HP Computing and Printing Middle East FZ-LLC	Premises 301, Floor 3, Building 14, P.O. Box 500553, Dubai Internet City, Dubai, United Arab Emirates
United Kingdom	HP Inc UK Limited	Earley West, 300 Thames Valley Park Drive, Reading, RG6 1PT, England
	HP UK Development Limited	Earley West, 300 Thames Valley Park Drive, Reading, RG6 1PT, England

United States	Compaq Information Technologies, LLC	1501 Page Mill Road, Palo Alto, Santa Clara, CA, 94304, United States
	Hewlett-Packard Company Archives LLC	1501 Page Mill Road, Palo Alto, Santa Clara, CA, 94304, United States
	Hewlett-Packard Enterprises, LLC	1501 Page Mill Road, Palo Alto, Santa Clara, CA, 94304, United States
	HP Health Solutions Inc.	1115 SE 164th Ave Columbia Center, Suite 210, Vancouver, WA, 98683
	HP US Digital LLC	1501 Page Mill Road, Palo Alto, Santa Clara, CA, 94304, United States
	HPI Federal LLC	1501 Page Mill Road, Palo Alto, Santa Clara, CA, 94304, United States
	Indigo America, Inc.	1501 Page Mill Road, Palo Alto, Santa Clara, CA, 94304, United States
	HP Hewlett Packard Group LLC	10300 Energy Drive, Spring, Harris County, TX, 77389, United States
	Hewlett-Packard World Trade, LLC	1501 Page Mill Road, Palo Alto, Santa Clara, CA, 94304, United States
	HP Inc.	1501 Page Mill Road, Palo Alto, Santa Clara, CA, 94304, United States
	HP USA Manufacturing LLC	1501 Page Mill Road, Palo Alto, Santa Clara, CA, 94304, United States
	PrinterOn America Corporation	818, W 7th Street, Suite 930, Los Angeles, CA, 90017, United States
	Tall Tree Insurance Company	400 Cornerstone DR, ST240, Williston, VT, 005495, United States
	Hewlett-Packard Development Company, L.P.	10300 Energy Drive, Spring, Harris County, TX, 77389, United States
Vietnam	HP Technology Vietnam Company Ltd	29 Le Duan Street, Saigon Tower, Level 10, Dist 1, Ho Chi Minh City, Vietnam

Appendix 2 Glossary

Adequate Third Countries – mean any third country or territory, or international organization, or a particular sector in a country or territory which the European Commission has determined that offers an adequate level of protection of Personal Data in accordance with Article 45 of GDPR. The countries or territories considered adequate are: Andorra, Argentina, Canada (commercial organizations), Isle of Man, Japan, Jersey, Faeroe Islands, Guernsey, New Zealand, State of Israel, Switzerland, Republic of Japan, Uruguay, and US companies adhered to the Data Privacy Framework (DPF) Framework.

Data Controller - means an entity (whether a natural or legal person, public authority, agency or other body) which alone, jointly or in common with others determines the purposes and means in which any item of Personal Data is processed.

Data Exporter - means the HP BCR Entity established in the EU or EEA who exports Personal Data to a Data Importer located in a third country (i.e., outside of the EEA).

Data Importer - means the HP BCR Entity established in a third country (i.e., outside of the EEA) who agrees to receive Personal Data from another HP BCR Entity located in the EU or EEA.

Data Processor - means an entity (whether a natural or legal person, public authority, agency or any other body) which processes Personal Data on behalf and upon instructions of the Data Controller.

Data Subject - means an identified or identifiable individual natural person to whom Personal Data relates.

EEA - means the zone of economic cooperation known as the European Economic Area and those countries which are participants in such zone, collectively.

Europe - means the EU Member States, EEA countries, Switzerland and Monaco.

European Union (EU) - means the political grouping known as the European Union and those countries which are members of such political union, collectively.

GDPR - means the European Union Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (as amended and replaced from time to time).

HP Customer - means any entity whose Personal Data is processed by any HP BCR Entities bound by the HP EU BCR for Processor.

HP Employees - means any HP BCR Entities' staff (including individual contractors and agency workers) who have access to the Personal Data.

HP EU BCR Entities - mean any HP entity that are bound by the HP EU BCR and have duly executed the Intra-group Agreement. HP EU BCR Entities are listed in Appendix 1, as that list may be updated in accordance with Section 6.

HP Global Master Privacy Policy - sets out the duties of HP and HP Employees when processing personal data about Data Subjects.

Personal Data - means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to his physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, including Special Category Data and any other data deemed to be personal data under applicable data protection law.

Personal Data Breach - means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

Privacy Statement - means HP Global Privacy Statement.

Special Category Data - means Personal Data revealing racial or ethnic origins; political opinions or affiliations; religious or philosophical beliefs; trade union membership; genetic data; biometric data for the purposes of uniquely identifying a natural person, health or sex life; and criminal convictions, offences, or proceedings.

Supervisory Authority - means a body with regulatory powers with respect to the protection of Personal Data.

Competent Supervisory Authority - means:

- i. the CNIL; or
- ii. any other Supervisory Authority which is “concerned” by the processing of Personal Data because:
 - (a) an HP BCR Entity is established in the country or territory in which that Supervisory Authority is established;
 - (b) Data Subjects living in the country or territory of that Supervisory Authority are likely to be affected by an HP BCR Entity’s processing of Personal Data, or
 - (c) it has received a complaint from a Data Subject relating to processing of Personal Data by an HP BCR Entity; or
 - (d) where Personal Data is processed by an HP BCR Entity located outside of the EU on behalf of an HP BCR Entity in the EU, the Competent Supervisory Authority for the HP BCR Entity in the EU.

Relevant Supervisory Authority - means the Supervisory Authority or court as set out below:

Factor	Supervisory Authority	Court
The European Country where the EU Data Subject has his or her habitual residence	√	√

The European Country where the EU Data Subject has their place of work.	√	
The European Country where the Original Data Exporter has an establishment		√

Trust and Privacy Organization - means the Group Privacy office at HP.