

SECURITY AND PRIVACY WHITE PAPER

Poly Global Elite Services Overview

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#### Introduction

This white paper addresses security and privacy related information regarding Poly Global Elite Services. This white paper describes the security features and access controls applied to HP | Poly's processing of personally identifiable information or personal data ("personal data") and customer data in connection with the provisioning and delivery of this Poly Managed Service, and the location and transfers of personal and other customer data. HP | Poly will use such data in a manner consistent with the HP Privacy Statement and this white paper (which may be updated from time to time). This white paper is supplemental to the HP Privacy Statement. The most current version of this white paper is available on HP | Poly's website.

Poly Global Elite Services are personalized and proactive support for your HP | Poly solution.

## Security at HP | Poly

Security is always a critical consideration for all HP | Poly products and services. HP | Poly's Information Security Management System (ISMS) has achieved ISO 27001:2013 certification. ISO/IEC 27001 is the most widely accepted international standard for information security best practices and you can be reassured that HP | Poly has established and implemented best-practice information security processes.

Product security at HP | Poly is managed through the HP Cybersecurity team which oversees secure software development standards and guidelines.

The HP | Poly Product Security Standards align with NIST Special Publication 800-53, ISO/IEC 27001:2013, and OWASP for application security. Guidelines, standards, and policies are implemented to provide our developers with industry approved methods for adhering to the HP | Poly Product Security Standards.

## **Privacy by Design**

HP | Poly implements internal policies and measures based on perceived risks which meet the principles of data protection by design and data protection by default. Such measures consist of minimizing the processing of personal data, anonymizing personal data as soon as possible, transparently documenting the functions, and processing of personal data and providing features which enable the data subject to exercise any rights they may have.

When developing, designing, selecting, and using applications, services and products that are based on the processing of personal data or process personal data to fulfill their task, HP | Poly considers the right to data protection with due regard.

# Security by Design

HP | Poly follows Security by Design principles throughout our product creation and delivery lifecycle which includes considerations for confidentiality, integrity (data and systems), and availability. These extend to all systems that HP | Poly uses – both on-premises and in the cloud as well as to the development, delivery, and support of HP | Poly products, cloud services and managed services.

The foundational principles which serve as the basis of HP | Poly's security practices include:

- 1. Security is required, not optional
- 2. Secure by default, Secure by design
- 3. Defense-in-depth
- 4. Understand and assess vulnerabilities and threats
- 5. Security testing and validation
- 6. Manage, monitor, and maintain security posture
- 7. End-to-end security: full lifecycle protection

## **Security Testing**

Both static and dynamic vulnerability scanning as well as penetration testing are regularly

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performed for production releases and against our internal corporate network by both internal and external test teams.

Patches are evaluated and applied in a timely fashion based on perceived risk as indicated by CVSSv3 scores.

## **Data Processing**

System logs and call detail records can be collected by or sent to HP | Poly. These may contain names, emails, IP addresses, locations.

Customers who contact HP | Poly for technical support are asked to provide contact information.

If someone is an individual user and the purchase of a Poly Global Elite Service has been made by their employer as the customer, all the privacy information relating to personal data in this white paper is subject to their employer's privacy policies as controller of such personal data.

# **Purpose of Processing**

Information that is processed is used for enhancing the user experience, allowing configuration of settings required for proper delivery of services and easy access to frequently used data.

When configured to use an optional HP | Poly device management solution, the on-premises server or cloud service processes configuration files and their overrides to aid the management of the devices in a given deployment. The server or cloud service may also process device network information, media statistics and device asset information to aid in device analytics, which enables device performance validation and visibility into customer quality of experience and service performance.

Source of Personal Data	Categories of PI Processed	Business Purpose for Processing	Disclosed to the following Service Providers
Support and reporting services	<ul> <li>Endpoint Display Name</li> <li>User Email Address</li> <li>User ID</li> <li>User Phone number</li> <li>User address/location</li> </ul>	<ul> <li>Troubleshooting and support remediation</li> <li>Provide required reporting</li> </ul>	None
Reporting data	All reports available to customer	Provide details of performance, usage, etc.	None
Technical support details	<ul> <li>Customer contact information</li> <li>Any artifacts provided/collected including logs, usage, etc.</li> </ul>	Troubleshooting and support	None

#### How Customer Data Is Stored and Protected

Reporting data is stored in an encrypted server in the HP | Poly IT environment for 13 months or the conclusion of the engagement, whichever comes first. Technical support details including customer contact information and any artifacts, including logs, usage, etc., are stored in HP | Poly CRMs and on SFTP (temporarily held until 90 days after ticket is closed).

HP | Poly may change the location of the business systems used to process customer information. The details of any such change shall be set forth in the latest copy of this white paper available on HP | Poly's website.

For transferring personal data of EU customers to the US, HP | Poly uses an Intragroup Data Transfer Agreement incorporating the EU Standard Contractual Clauses as the transfer mechanism.

#### **Data Deletion and Retention**

HP | Poly may retain customer data for as long as needed to provide the customer with the Poly Global Elite Service. When a customer makes a request for deletion to HP's Chief Privacy and Data Protection Officer form, HP | Poly will delete the requested data within 30 days, unless the data is required to be retained for HP | Poly's legitimate business purposes or if needed to provide the service to customer. HP | Poly may "anonymize" personal data in lieu of deletion. The anonymization process is irreversible and includes but is not limited to searching and sanitizing all customer-specific data (such as name, site information, and IP address) with randomly generated alphanumeric characters.

# **Server Access and Data Security**

Computers used to process customer information in the delivery of the Poly Global Elite Service are protected from malware and viruses, patched in a timely manner and utilize encryption to protect any data stored locally. They adhere to HP | Poly's ISMS requirements for controlled access and follow least privilege and need-to-know principles. When these computers are used remotely, they must authenticate to the HP | Poly network using MFA.

## **Change Management**

HP | Poly's delivery of Poly Global Elite Services utilizes the ITIL framework.

A formal change management process is followed by all teams at HP | Poly to minimize any impact on the services provided to the customers. All changes implemented go through vigorous quality assurance testing where all functional and security requirements are verified. Once Quality Assurance approves the changes, the changes are pushed to a staging environment for UAT (User Acceptance Testing). Only after final approval from stakeholders, changes are implemented in production. While emergency changes are processed on a much faster timeline, risk is evaluated, and approvals are obtained from stakeholders prior to applying any changes in production.

## **Disaster Recovery and Business Continuity**

Poly Global Elite Services are architected to provide high reliability, resiliency, and security. HP | Poly has a Business Continuity and Disaster Recovery Plan reviewed and approved by management to ensure that we are appropriately prepared to respond to an unexpected disaster event. HP | Poly tests disaster recovery processes and procedures on an annual basis. We use the results of this testing process to evaluate our preparedness for disasters and to validate the completeness and accuracy of our policies and procedures.

## **Security Incident Response**

The HP Cybersecurity team promptly investigates reported anomalies and suspected security breaches

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on an enterprise-wide level. Please contact them directly at informationsecurity@hp.com

The HP Cybersecurity team works proactively with customers, independent security researchers, consultants, industry organizations, and other suppliers to identify possible security issues with HP | Poly products and networks. HP | Poly security advisories and bulletins can be found on the HP Customer Support website.

# **Subprocessors**

HP | Poly uses certain subprocessors to assist in providing our products and services. A subprocessor is a third-party data processor who, on behalf of HP | Poly, processes customer data. Prior to engaging a subprocessor, HP | Poly executes an agreement with the subprocessor that is in accordance with applicable data protection laws.

The subprocessor list <u>here</u> identifies HP | Poly's authorized subprocessors and includes their name, purpose, location, and website. For questions, please contact <u>HP's Chief Privacy and Data Protection</u>
Officer form.

Prior to engagement, suppliers that may process data on behalf of HP | Poly must undergo a privacy and security assessment. The assessment process is designed to identify deficiencies in privacy practices or security gaps and make recommendations for reduction of risk. Suppliers that cannot meet the security requirements are disqualified.

#### **Additional Resources**

To learn more about Poly Global Elite Services, please visit our website.

## Disclaimer

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