

Ethics and Compliance Helpline Privacy Notice

1. Purpose

McAfee, LLC is committed to protecting the privacy and security of your personal data. This Ethics and Compliance Helpline Privacy Notice ("Helpline Privacy Notice") describes how McAfee and its subsidiaries, affiliates, and related entities (collectively, "McAfee," "we," or "us") collect and process personal data about you in its Ethics and Compliance Helpline ("Helpline").

2. Scope

This Helpline Privacy Notice applies to anyone who submits any information on McAfee's Helpline.

We will only process your personal data in accordance with this Helpline Privacy Notice unless otherwise required by applicable law. We take steps to ensure that the personal data that we collect about you, or others is accurate, adequate, relevant, not excessive, and processed for limited purposes as disclosed in this Helpline Privacy Notice.

3. Practices

3.1 Collection of Personal Data

For the purposes of this Helpline Privacy Notice, personal data means any information about an identifiable individual. Personal data excludes anonymous or de-identified data that is not associated with a particular individual. To carry out our ethics and compliance activities and obligations, we may collect, store, and process the following categories of personal data, (note: not all below listed categories apply to all situations):

- Personal contact details such as name, title, state and/or country of residence and email addresses.

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- Performance information.
- Start date and job title.
- Photograph (if voluntarily provided).
- Internet or other similar network activity, information on interaction with a website or application.

We will collect most of the personal data that we process directly from you or during an investigation of claims made on the Helpline report. In limited circumstances and only to the extent permitted by law, third parties may provide your personal data to us, such as our corporate affiliates, publicly available databases, third-party business partners, and other third-party sources.

3.2 Use of Personal Data

McAfee only processes your personal data where applicable law permits or requires it, including where the processing is necessary to comply with a legal obligation that applies to us, for our legitimate interests or the legitimate interests of third parties, to protect your vital interests, or with your consent if applicable law requires consent.

McAfee may process your personal data for the following legitimate business purposes:

- Complying with applicable law.
- To prevent or mitigate fraud.
- Gathering evidence in connection with investigations.
- To ensure a reporter, or anyone who participates in an investigation, is not subject to retaliation for the same.
- Meeting education, training, and development requirements.
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics analyses to review and better understand compliance obligations.

3.3 Collection and Use of Special Categories of Personal Data

McAfee may collect and process special categories of personal data (for example, to include gender, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, data concerning sex life or sexual orientation, data relating to criminal convictions and offences) where (1) permitted by law, (2) when you voluntarily provide this information, (3) to carry out our obligations under relevant law, (4) when the data specifically applies to the Helpline report, and/or (5) as applicable law otherwise permits. This data could be used for the following purposes:

- Gender, age Race or ethnic origin, religious affiliation, health information, sexual orientation, or other information about legally protected categories to ensure meaningful equal opportunity monitoring and reporting.
- Any of the categories listed at the start of Section 3.3 for the purposes of administering the Helpline, for looking into the information provided in a Helpline report and for otherwise fulfilling the purposes of the Helpline in compliance with appropriate law.

If (1) required or permitted by law, (2) McAfee has a legitimate need to process special categories of personal data for any purpose and (3) it does not impact or impair the purposes of investigating the Helpline inquiry, we will provide you with notice and, obtain your prior, express consent.

We will always treat special categories of personal data as McAfee Restricted and Confidential Information, in accordance with McAfee's policies and applicable law, and we will only share such data internally where there is a specific and legitimate business purpose for sharing the data and with those who have a business need to know.

3.4 Data Sharing

We will only disclose your personal data to third parties where required by law or to our employees, contractors, designated agents, or third-party service providers that require such information to assist McAfee with administering the Helpline, including in the course of investigating Helpline reports, which can relate to third-party service providers that provide services to McAfee. Third-party service providers may include, but are not limited to, auditors, investigators, law firms, and data storage or hosting

providers. These third-party service providers may be located outside of your home jurisdiction.

We require all our third-party service providers to implement appropriate security measures to protect your personal data consistent with McAfee policies and any data security obligations applicable to us. We do not permit McAfee's third-party service providers that process your personal data on McAfee's behalf to use such personal data for their own purposes. We only permit third-party service providers to process your personal data for specified purposes in accordance with McAfee instructions.

McAfee may also disclose your personal data for the following additional purposes where permitted or required by applicable law:

- To other members of our group of companies (including outside of your home jurisdiction) for the purposes set out in this Helpline Privacy Notice and as necessary for ethics and compliance obligations.
- As part of our regular reporting activities to other members of our group of companies.
- To comply with legal obligations or valid legal processes such as search warrants, subpoenas, or court orders. When McAfee discloses your personal data to comply with a legal obligation or legal process, reasonable steps will be taken to ensure that only the minimum personal data necessary for the specific purpose and circumstance is disclosed.
- To protect the rights and property of McAfee.
- Where the personal data is publicly available.
- If a business transfer or change in ownership occurs and the disclosure is necessary to complete the transaction. In these circumstances, McAfee will limit data sharing to what is absolutely necessary and will anonymize the data where possible.
- For additional purposes with your consent where such consent is required by law.

3.5 Cross-Border Data Transfers

Where permitted by applicable law, McAfee may transfer the personal data collected about you to jurisdictions outside your home country that may not be deemed to provide the same level of data protection as your home country, as necessary for the purposes set out in this Helpline Privacy Notice. McAfee has implemented appropriate data transfer mechanisms to secure the transfer of personal data outside your home country.

3.6 Data Security

McAfee has implemented appropriate physical, technical, and organizational security measures designed to secure your personal data against accidental loss and unauthorized access, use, alteration, or disclosure. In addition, McAfee limits access to personal data to those employees, agents, contractors, and other third parties who have a legitimate business need for such access.

3.7 Data Retention

Except as otherwise permitted or required by applicable law or regulation, McAfee will only retain your personal data for as long as necessary to fulfill the purposes for which it was collected, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal data, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes we process your personal data for, and whether we can achieve those purposes through other means.

Under some circumstances McAfee may anonymize your personal data so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you and without requiring your consent.

3.8 Your Rights

You have the right to request access to, correct, and erase the personal data that we hold about you, or object to the processing of your personal data under certain circumstances. You also have the right to request that we transfer your personal data to another party. To exercise your rights, please visit McAfee's [Individual Data Request portal](#), or contact us at protectprivacy@mcafee.com.

Applicable law may allow or require McAfee to refuse to provide you with access to some or all of the personal data that we hold about you or the Helpline report, or may have destroyed, erased, or made your personal data anonymous in accordance with our record retention obligations and practices. If McAfee cannot provide you with access to your personal data, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

3.9 Right to Withdraw Consent

Where you have provided your consent to the collection, processing, or transfer of your personal data, you may have the legal right to request to withdraw your consent under certain circumstances. All requests will be considered in view of relevant laws and regulations. To request to withdraw your consent, please visit McAfee's [Individual Data Request portal](#), or contact us at protectprivacy@mcafee.com.

3.10 Changes to this Privacy Notice

McAfee reserves the right to update this Helpline Privacy Notice at any time and will make the current version of the Notice available when we make any updates.

3.11 Contact Us

If you have any questions about our processing of your personal data or would like to make an access or other request, please contact us at protectprivacy@mcafee.com.

3.12 Data Protection Officer

In the European Union ("EU") and the United Kingdom ("UK"), we have appointed a Data Protection Officer. If you are a resident of the EU or the UK and have any questions about this Helpline Privacy Notice or how we handle your personal data, please contact the Data Protection Officer at:

Attn: McAfee Data Protection Officer
Data Business Services
Nördliche Münchner Straße 47
D-82031 Grünwald/ München
Germany
+49 (0)89 12501375-0

3.13 Data Protection Authorities

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You have the right to lodge a complaint with the data protection authority where you reside in the jurisdiction in which you work, or in which the alleged infringement occurred.