

INTEL CORPORATE PRIVACY RULES

Deed Poll



15th December, 2015

Intel Corporate Privacy Rules

Deed Poll

This Deed is dated 15th December, 2015.

Intel Corporation, a company incorporated under the laws of Delaware in the United States of America and whose address is 2200 Mission College Blvd, Santa Clara, CA 95052-8119, USA (“**Intel**”), declares that:

1. Intel binds itself and those Intel entities listed in Schedule 1 (together the “**Intel Entities**”), as amended from time to time, to comply with the Intel Corporate Privacy Rules contained in Schedule 2 (the “**ICPRs**”) and the third party beneficiary rights in Schedule 3, in respect of any information relating to an identified or identifiable natural person transferred to any of the Intel Entities, by any of the Intel Entities established in Europe¹ (“**Personal Information**”);
2. Intel has the power to procure compliance with the ICPRs by all Intel Entities;
3. the Intel Entities will put in place contractual or other suitable measures to bind employees and/or individual contractors to process Personal Information in compliance with the ICPRs;
4. Intel will put in place training procedures to ensure that employees are aware of, and comply with, their obligations under the ICPRs;
5. Intel has a legal function and other personnel, whose responsibilities include oversight of compliance with the ICPRs;
6. the Intel Entities have put in place measures and sanctions to deal with any breach of the ICPRs by any of their employees;
7. all individuals whose Personal Information is collected or used by an Intel Entity in Europe and transferred to an Intel Entity outside Europe under the ICPRs may enforce the third party beneficiary rights listed in Schedule 3 against Intel Ireland Limited (“**IIL**”) either in the courts of the jurisdiction in which the Intel Entity responsible for exporting such Personal Information is established or in the Irish courts, in accordance with the laws of Ireland;
8. Intel will ensure each Intel Entity complies with any instruction from IIL requiring the Intel Entity to remedy a breach of the ICPRs;
9. if an individual can demonstrate they have suffered damage and can establish facts which show it is likely the damage occurred because of a breach of the ICPRs, IIL will accept the burden of proof to show that the Intel Entity outside Europe was not responsible for the breach of the ICPRs giving rise to the damage, or that no breach took place.

This Deed shall be interpreted in accordance with the laws of Ireland.

Intel is entitled to revoke or amend this Deed only in writing signed by two or more authorised representatives of Intel.

¹ The reference to Europe includes the EEA and Switzerland.

Intel Corporation

Signed




Vice President
Deputy General Counsel, Law and Policy Group



Vice President, Law and Policy Group
Associate General Counsel, Chief Privacy and Security Counsel

Date: 12/15/15

Legal OK	
Claire Molloy	December 8, 2015
	

Schedule 1 - Intel Entities

All of the entities listed below are wholly owned (directly or indirectly) by Intel Corporation.

AO Intel A/O

Basis Science, Inc.

Componentes Intel de Costa Rica, S.A.

Cruxbot Algorithms Private Limited

Digital Content Protection, L.L.C.

Electronics Technology Insurance Company Limited

Intel (Shanghai) Equity Investment Fund Management Co., Ltd.

Intel (Shanghai) Equity Investment Fund Partnership Enterprise (Limited Partnership)

Intel Americas, Inc.

Intel Asia Holding Limited

Intel Asia Pacific Call Center Corporation

Intel Asia-Pacific Research & Development Ltd.

Intel Atlantic, Inc.

Intel Australia Pty. Ltd.

Intel Austria GmbH

Intel Benelux B.V.

Intel Capital (Cayman) Corporation

Intel Capital (Mauritius), Ltd.

Intel Capital Corporation

Intel China Ltd.

Intel China Research Center Ltd.

Intel Copenhagen ApS

Intel Corporation (UK) Ltd.

Intel Corporation (UK) Ltd. - Dubai Branch

Intel Corporation (UK) Ltd. (Algeria Liaison Office)

Intel Corporation (UK) Ltd. (Jordan Representative Office)

Intel Corporation (UK) Ltd. (Kenya Branch)

Intel Corporation (UK) Ltd. (Lebanon Representative Office)

Intel Corporation (UK) Ltd., Kazakhstan Representative Office

Intel Corporation Egypt LLC

Intel Corporation Hungary Trading Limited Liability Company

Intel Corporation Iberia S.A.

Intel Corporation Italia S.p.A.

Intel Corporation Ltd.

Intel Corporation NV/SA

Intel Corporation SAS

Intel Czech Tradings, Inc.

Intel Denmark ApS

Intel Deutschland GmbH

Intel Electronics (Malaysia) Sdn. Bhd.

Intel Electronics Ltd.

Intel EM Ltd.

Intel EM Ltd., Dhaka Liaison Office

Intel EM Ltd., Sri Lanka Liaison Office

Intel EM Ltd., Ulaanbaatar Representative Office

Intel Europe, Inc.

Intel Finland OY

Intel Free Trade Zone Park, S.A.

Intel Hungary Limited

Intel Indonesia Corporation

Intel Indonesia Corporation - Jakarta Representative Office

Intel Innovation Technologies Limited

Intel Innovation Technologies Limited, Hsinchu Branch

Intel International B.V.

Intel International Finance CVBA

Intel International, Inc.

Intel Ireland Limited

Intel Israel (74) Limited

Intel Kabushiki Kaisha

Intel Korea Ltd.

Intel Malaysia Sdn. Berhad

Intel Massachusetts, Inc.

Intel Microelectronics (M) Sdn. Bhd.

Intel Microelectronics (Phils.) Inc.

Intel Microelectronics (Thailand) Limited

Intel Microelectronics Asia LLC

Intel Microelectronics Asia LLC, Kaohsiung Branch

Intel Microelectronics Asia LLC, Taiwan Branch

Intel Microprocessor Corporation

Intel Microprocessors Greece Societe Anonyme for the Provision of Consulting Services

Intel Mobile Communications Denmark ApS

Intel Mobile Communications Egypt LLC

Intel Mobile Communications France SAS

Intel Mobile Communications India Private Limited

Intel Mobile Communications Israel Ltd.

Intel Mobile Communications Korea Co. Ltd.

Intel Mobile Communications North America Inc.

Intel Mobile Communications South East Asia Pte. Ltd.

Intel Mobile Communications Technology (Beijing) Ltd.

Intel Mobile Communications Technology (Shanghai) Ltd.

Intel Mobile Communications Technology (Xi'an) Ltd.

Intel Mobile Communications UK Limited

Intel MSC Sdn. Bhd.

Intel of Canada, Ltd./Intel du Canada, Ltee.

Intel Pakistan Corporation

Intel Pakistan Corporation - Karachi Liaison Office

Intel Pan European Pension Trustee Limited

Intel Phils. Holding LLC

Intel Products (Chengdu) Ltd.

Intel Products (M) Sdn. Bhd.

Intel Products (Shanghai) Ltd.

Intel Products Vietnam Co., Ltd.

Intel Resale Corporation

Intel Research and Development Ireland Limited

Intel Research and Innovation Ireland Limited

Intel Security Public Sector LLC

Intel Semi Conductor West Africa Limited

Intel Semi Conductors Ltd.

Intel Semiconductor (Dalian) Ltd.

Intel Semiconductor (US) LLC

Intel Semiconductor AG

Intel Semiconductor Limited

Intel Semiconductores del Ecuador INTELSEMSA S.A.

Intel Semiconductores del Peru S.A.

Intel Semicondutores do Brasil Ltda.

Intel Services Division LLC

Intel Services, LLC

Intel Singapore Holding Pte. Ltd.

Intel Software de Argentina S.A.

Intel Software Development S.R.L

Intel Software LLC

Intel South Africa Corp. (Branch)

Intel South Africa Corporation

Intel Sweden A.B.

Intel Technologies d.o.o. Belgrade

Intel Technologies LLC

Intel Technologies, Inc.

Intel Technology (US), LLC

Intel Technology Asia Pte Ltd

Intel Technology Finance Limited

Intel Technology India Private Limited

Intel Technology Poland Sp. z o.o.

Intel Technology Sdn. Berhad

Intel Tecnologia de Colombia S.A.

Intel Tecnologia de Mexico S.A. de C.V.

Intel Tecnologia de Panama S.A.

Intel Tecnologia Dominican Republic, S.r.l.

Intel Tecnologia El Chile S.A.

Intel Tecnologia El Salvador, S.A. de C.V.

Intel Tecnologia Guatemala S.A.

Intel Tecnologia Puerto Rico, LLC

Intel Teknoloji Hizmetleri Limited Sirketi

Intel Trading (Shanghai) Co., Ltd.

Intel UK Pension Plan Trustees Limited

Intel Ukraine LLC

Intel Ukraine Microelectronics Limited

Intel Vietnam Company Ltd.

Intel Vilnius UAB

Kno, Inc.

Lantiq Beteiligungs Verwaltungs GmbH

Lantiq Beteiligungs-GmbH & Co. KG

Lantiq Intermediate Holdco S.à r.l.

Lantiq Latvia SIA

McAfee (Beijing) Security Software Co., Ltd.

McAfee (Israel) Ltd.

McAfee Co., Ltd.

McAfee India Sales Private Limited

McAfee Ireland Limited

McAfee New Zealand Limited

McAfee Norway AS

McAfee Security S.a r.l.

McAfee Software (India) Private Limited

McAfee, Inc.

Recon Instruments Inc.

Turbe - Distribucao e Marketing de Produtos Electronicos, Sociedade Unipessoal, Lda.



FINAL v4.1

15th December, 2015

Intel Corporate Privacy Rules

Contents

INTRODUCTION TO THE INTEL CORPORATE PRIVACY RULES	3
PART I – BACKGROUND AND ACTIONS	4
PART II – THE RULES	6
SECTION A – COLLECTING AND USING PERSONAL INFORMATION	6
SECTION B – PRACTICAL COMMITMENTS MADE BY INTEL	9
PART III – APPENDICES	10
APPENDIX 1 – PERSONAL INFORMATION REQUEST PROCEDURE	10
APPENDIX 2 – AUDIT PROTOCOL	13
APPENDIX 3 – COMPLAINT HANDLING PROCEDURE	15
APPENDIX 4 – CO-OPERATION PROCEDURE	18
APPENDIX 5 – UPDATE PROCEDURE	20
APPENDIX 6 – REVISION HISTORY	22

INTRODUCTION TO THE INTEL CORPORATE PRIVACY RULES

The Intel Corporate Privacy Rules (**Rules**) establish Intel's approach to compliance with privacy law, also known as data protection law, and specifically to transfers of personal information between Intel companies.

Intel companies¹ and their employees must comply with and respect the Rules when collecting and using personal information. Additional privacy compliance requirements may apply to specific business areas or functions.

The Rules apply to all personal information of employees, customers, suppliers and other individuals, collected and used by Intel. The Rules also apply where Intel companies process personal information on behalf of other Intel companies.

The Rules are communicated to all Intel employees and published on the external Intel website accessible at www.intel.com.

FURTHER INFORMATION

If you have any questions about the Rules, your rights under the Rules or any other privacy issues you can contact the Intel Privacy Office at the addresses below.

Internet : <http://www.intel.com/privacy>

Email : privacy.feedback@intel.com

Address: Intel Corporation
ATTN: Privacy
2200 Mission College Blvd.
Santa Clara,
CA 95054
USA

¹ The list of the Intel companies bound by the Intel Corporate Privacy Rules is contained in the Deed Poll.

PART I – BACKGROUND AND ACTIONS

WHAT IS PRIVACY LAW?

Privacy law, also known as “data protection” law in some countries, gives individuals the right to control how their “personal information”² is used and sets out how organizations must manage and protect that information.

HOW DOES PRIVACY LAW AFFECT INTEL INTERNATIONALLY?

Intel companies transfer personal information to other Intel companies for a variety of reasons connected to the technical and operational requirements of the business. For example, personal information about employees may be transferred for the administration of employee payroll and benefits or in connection with Intel’s internal employee education and development programs. Another example is the transfer of customer personal information in order to provide product or technical support services.

When Intel transfers personal information between countries, Intel provides an adequate level of protection for that information.

WHAT IS INTEL DOING ABOUT IT?

Respect for privacy is fundamental to Intel’s culture and helps us maintain an environment where individuals can trust Intel and our technology.

The Intel Corporate Privacy Rules are designed to provide an adequate level of protection for all personal information collected and used by Intel. The Rules apply in all cases where Intel collects and uses personal information, whether online or offline, or by manual or automatic means.

The Rules apply worldwide and ensure that Intel’s collection and use of personal information complies with European legal requirements³. Most transfers of personal information take place between Intel companies worldwide and Intel Corporation in the USA, but personal information may flow between any Intel companies.

² In these Rules, the term “personal information” is used to refer to any information relating to an identifiable individual. Other terms commonly used to refer to information relating to an identifiable individual include “personal data” and “personally identifiable information”.

³ For example the “Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.”

WHAT DOES THIS MEAN IN PRACTICE?

Intel's Global Privacy Officer is responsible for overseeing and ensuring compliance with the Rules, supported by the Intel Privacy Office and a matrixed network of Intel staff, responsible for enabling compliance with the Rules on a day-to-day basis. The Intel Global Privacy Officer's responsibilities include advising company management as required, working with national data protection authorities, and oversight of the Intel Privacy Office.

The Intel Global Privacy Officer is responsible for ensuring that changes to the Rules are notified to the Intel companies and to individuals whose personal information is processed by Intel.

If an individual, whose information is collected and/or used by Intel, believes Intel has not complied with the Intel Corporate Privacy Rules, that individual may raise the matter with Intel's Global Privacy Officer.

In addition, individuals whose information is collected and/or used by Intel in Europe and transferred to Intel companies outside Europe⁴ may exercise certain rights against Intel Ireland Limited ("IIL") in accordance with the terms of the deed poll made by Intel Corporation ("Deed Poll") and published on www.intel.com/privacy. If such an individual can demonstrate they have suffered damage, and can establish facts which show it is likely the damage has occurred because of a breach of the Rules, IIL will accept the burden of proof to show that the Intel Entity outside Europe was not responsible for the breach of the Rules giving rise to the damage or that no breach took place.

The Deed Poll binds Intel Corporation and the other Intel entities listed in it to comply with the Rules when personal information is collected, used and transferred from Intel companies based in Europe to Intel companies established elsewhere. The rights set out in the Deed Poll are:

- To enforce compliance with the Rules, including its appendices;
- To lodge a complaint with a European data protection authority of competent jurisdiction and/or to take action against IIL either in the courts of the jurisdiction in which the Intel company responsible for exporting such personal information is established or the Irish courts, in accordance with the laws of Ireland, in order to enforce compliance with the Rules;
- To make complaints to an Intel company within Europe, seek appropriate redress from IIL, including the remedy of any breach of the Rules by any Intel company outside Europe and, where appropriate, receive compensation from Intel for any damage suffered as a result of a breach of the Rules in accordance with the determination of a court or other competent authority;
- To obtain a copy of the Rules and the Deed Poll on request.

⁴ In these Rules, the term Europe includes the European Economic Area (EEA) and Switzerland

PART II – THE RULES

The Rules are divided into two sections:

Section A: The Rules that Intel must observe when collecting and using personal information.

Section B: The practical commitments made by Intel to the European data protection authorities.

SECTION A – COLLECTING AND USING PERSONAL INFORMATION

RULE 1 – COMPLYING WITH LOCAL LAW: Intel will ensure personal information is collected and used in compliance with local law.

Where the Rules or company guidelines differ from local laws or regulations, Intel will always follow the higher standard.

The Rules also apply where Intel companies process personal information on behalf of other Intel companies.

RULE 2 – ENSURING TRANSPARENCY: Intel will explain to individuals how their personal information will be used.

Intel will provide clear and comprehensive notice when personal information is collected describing how personal information will be used and who it will be shared with, unless there is a legitimate basis for not doing so.

RULE 3 – USING PERSONAL INFORMATION FOR A VALID PURPOSE: Intel will only collect and use personal information for purposes which are relevant to Intel and are known to the individual or which are within their expectations.

If Intel changes the purpose for which personal information is used, Intel will make individuals aware of the changes, unless the changes are within the individual's expectations and they can express their concerns, or unless there is a legitimate basis for not doing so. If Intel changes the purpose for which personal information is used, Intel may be required to ask the individuals concerned for their consent.

Intel will identify and clearly explain the purposes for which personal information will be used (see Rule 2).

RULE 4 – ENSURING DATA QUALITY: Intel will only collect and use personal information that is relevant and not excessive for the purpose. Intel will keep personal information accurate and up to date. Intel will only retain personal information for as long as is necessary to meet the purpose or other legal requirements.

Intel provides individuals with a choice of methods to access and amend personal information and communication preferences, including online, in writing (including email), or by contacting the appropriate Intel contact centers or offices.

Intel collects and uses the minimum amount of personal information necessary to achieve a valid purpose (see Rule 3). Intel retains personal information only for as long as is necessary to meet the purpose or other legal requirements.

RULE 5 – TAKING APPROPRIATE SECURITY MEASURES: Intel will implement appropriate technical and organizational measures to protect personal information.

Intel applies technical and organizational measures appropriate to the risks presented by the processing of personal information. Where Intel companies process personal information on behalf of other Intel companies, those companies will adhere to the Rules and act only on the instructions of the Intel company on whose behalf the processing is carried out.

RULE 6 – HONOURING INDIVIDUALS' RIGHTS: Intel will respond to inquiries or requests made by individuals about their personal information. Intel will reply to requests to rectify, delete, block or cease processing personal information.

Intel will respond to requests from individuals whose information is collected and used by Intel, in accordance with the Personal Information Request Procedure (see Appendix 1).

RULE 7 – PROTECTING PERSONAL INFORMATION TRANSFERRED TO THIRD PARTIES: Intel will ensure that personal information transferred to third parties is adequately protected.

Transfers of personal information to third parties outside Intel are not allowed without appropriate steps being taken to ensure that there is a legal basis for the transfer and

to protect the personal information being transferred, such as contractual clauses, whether the third party is a data controller or a service provider.

For example, where a third party service provider processes personal information on behalf of Intel, Intel will enter into a contract with that provider which states that the third party service provider will act only on Intel's instructions and will adopt proportionate technical and organisational security measures to safeguard the personal information.

Appropriate technical and organizational measures to protect personal information are also applied during the transfer of the personal information to a third party.

Validation of security measures implemented by third parties takes place during the procurement process and is repeated periodically as required, for example in response to contract renewal or changes in business, legal or regulatory requirements.

RULE 8 – SAFEGUARDING THE USE OF SENSITIVE PERSONAL INFORMATION: Intel will only use sensitive personal information if it is absolutely necessary and where the individual's express consent has been obtained, unless Intel has an alternative legitimate basis for using the information.

Sensitive personal information is information about an individual's racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, health, sex life and criminal convictions. Intel will assess whether the collection and use of sensitive personal information is required for the proposed use and when it is absolutely necessary in the context of the business. Individuals must expressly agree to the collection and use of their sensitive personal information by Intel, unless there is an alternative legitimate basis for collecting and using the information.

Intel classifies personal information based upon its sensitivity. Intel implements appropriate technical and organizational measures to protect sensitive personal information, based on its classification (see also Rule 5).

RULE 9 – USING PERSONAL INFORMATION FOR DIRECT MARKETING: Intel will not use personal information for direct marketing to a consumer unless the consumer has agreed to that use. Intel will give all individuals the opportunity to opt out from receiving direct marketing from Intel. Intel will honour the opt out requests it receives.

Intel will identify and clearly explain the purposes for which personal information will be used as described in Rule 2. Individuals have the right to object to the collection

and use of their personal information for direct marketing purposes. Intel will provide individuals with a choice of methods to access and amend personal information and communication preferences for direct marketing (see Rule 4).

RULE 10 – MAKING AUTOMATED DECISIONS: Intel will explain the logic used to make an automated decision about an individual, upon request.

Individuals that are subject to a decision based only on automated processing of personal information are entitled, by making a written request to Intel, to know the logic involved in the decision.

SECTION B – PRACTICAL COMMITMENTS MADE BY INTEL

RULE 11 – TRAINING: Intel will provide appropriate training to employees who collect, use or access personal information, or who are involved in the development of products, services or tools used to process personal information.

RULE 12 – AUDITING: Intel will follow the Audit Protocol set out in Appendix 2.

RULE 13 – HANDLING COMPLAINTS: Intel will follow the Complaint Handling Procedure set out in Appendix 3.

RULE 14 – CO-OPERATING WITH DATA PROTECTION AUTHORITIES: Intel will follow the Co-operation Procedure set out in Appendix 4.

RULE 15 – UPDATING THE RULES: Intel will follow the Update Procedure set out in Appendix 5.

RULE 16 – CONFLICTING LEGAL REQUIREMENTS: If Intel becomes aware of a conflict between national law and the Rules which would prevent Intel from complying with the Rules, the Intel Global Privacy Officer will be promptly informed of the conflict. The Intel Global Privacy Officer will decide how to resolve the issue and will consult with the appropriate data protection authority if necessary.

PART III – APPENDICES

INTEL CORPORATE PRIVACY RULES

APPENDIX 1 – PERSONAL INFORMATION REQUEST PROCEDURE

1. Background

The purpose of the Intel Corporate Privacy Rules (Rules) is to establish Intel's approach to compliance with privacy law, also known as data protection law.

An individual whose personal information is collected and used by Intel may write to Intel to ask for a copy of the personal information (including electronic and some paper records) about them held by Intel (Request). If that personal information is shown to be inaccurate, the individual may ask for that information to be corrected, deleted or blocked and, in certain circumstances may object to the processing of their personal information. Intel will consider such requests and deal with them as appropriate.

This document sets out the procedure Intel will follow when Intel receives a Request.

2. Approach

2.1 SCOPE OF REQUESTS

Intel will respond to individuals who make Requests. This includes Requests that are not presented in a formal manner, or that may not specifically mention privacy or data protection law.

Personal information covered by a Request may include the personal information about the individual Intel collects and uses, including a description of the personal information, the purposes for which the information is used, and a description of transfers of that personal information to others.

2.2 MAKING A REQUEST

An individual wishing to make a Request can do so:

- Online at: www.intel.com/privacy
- Using email to: privacy.feedback@intel.com

- In writing to:
Intel Corporation
ATTN: Privacy
2200 Mission College Blvd.
Santa Clara,
CA 95054
USA
- In addition, Intel's offices, programs, contact centers and employees are required to direct privacy-related enquiries to the Intel Privacy Office in a timely manner.

Individuals making a Request are required to confirm that any information they provide in the course of making the Request is correct to the best of their knowledge and belief, and to confirm they are requesting their own personal information.

Individuals may make Requests at reasonable intervals.

Intel may require a fee for Requests to access personal information.

2.3 INTEL'S RESPONSE

Intel will use reasonable endeavours to acknowledge receipt of a Request within 5 working days of the Request being received by Intel's Privacy Office.

Intel will explain to individuals making Requests that it may be necessary to confirm their identity and require more detailed information in order to locate the requested personal information. Intel will also explain that attempting to obtain personal information to which they are not entitled may be a violation of the law.

If the Request is unclear, imprecise or unreasonable, Intel will ask the individual to clarify what sort of personal information they are requesting and where they expect this information to be found.

Intel will respond to a Request within 28 calendar days of the date the Request is clearly understood by Intel.

If the Request is too complex to allow a response within 28 calendar days, Intel will provide the individual with an estimate of when a response will be provided.

Unless prohibited under applicable law, Intel may withhold certain information, including (but not limited to) information:

- obtained or retained in connection with the prevention or detection of crime, or that Intel is required to withhold in response to national or international legal requirements (for example for national security purposes);
- where necessary for legitimate business purposes;
- covered by legal professional privilege;
- relating to third parties (unless their consent has been obtained or it is reasonable to supply the data without their consent);
- relating to the protection of the individual making the request or the rights and freedoms of others;
- where the search for that data would require disproportionate effort or have a disproportionate effect, for example due to the cost of providing the data, the time it would take to retrieve the data or how difficult it may be to obtain the data requested.

A Request will be considered closed on the date the individual making the Request is provided with the information or is informed that Intel has decided not to provide the information.

2.4 WHAT HAPPENS IF AN INDIVIDUAL DISPUTES A RESPONSE?

If an individual disputes Intel's response the individual may notify Intel that they do not agree with Intel's response and/or raise the matter with the relevant national data protection authority.

If the individual notifies Intel that they do not agree with Intel's response the matter will be handled in accordance with section 2.3 of the Complaint Handling Procedure.

INTEL CORPORATE PRIVACY RULES

APPENDIX 2 – AUDIT PROTOCOL

1. Background

The purpose of the Intel Corporate Privacy Rules (**Rules**) is to establish Intel's approach to compliance with privacy law, also known as data protection law. This document sets out how Intel's compliance to the Rules will be audited.

The Intel Privacy Office provides guidance about the collection and use of personal information subject to the Rules and assesses personal information collection and use for potential privacy-related risks. The collection and use of personal information with the potential for significant privacy impacts are therefore subject to detailed oversight and evaluation not just during the audit process but on an on-going basis.

2. Approach

2.1 SCOPE OF AUDIT

Intel will perform regular audits of compliance to the Rules. Intel will ensure such audits address all aspects of the Rules, including Intel's information technology systems and databases, security policies, contractual provisions, training, privacy policies and guidelines.

Intel will ensure that any issues or instances of non-compliance with the Rules identified by audits are brought to the attention of Intel's Global Privacy Officer and Intel's company management (including, where appropriate, Intel's Corporate Officers, Executive Officers and/or Board of Directors) as required, and that appropriate corrective actions are taken to ensure compliance.

2.2 TIMING

Intel will regularly audit for compliance to the Rules through its standard, integrated privacy assessment process. Intel will conduct audits of compliance to the Rules on an annual basis, along with ad hoc audits at the request of Intel's Global Privacy Officer or any other competent function.

2.3 AUDITORS

Audit of compliance to the Rules will be undertaken by Intel's Privacy Office, but reliance on work performed by internal or external auditors may be determined by Intel's Global Privacy Officer and/or Internal Audit. Intel's Privacy Office will manage and provide quality assurance of audit work performed by others.

2.4 PROVIDING AUDIT REPORTS TO EUROPEAN DATA PROTECTION AUTHORITIES

Intel will provide copies of the results of any audit of the Rules to a European data protection authority of competent jurisdiction upon request, subject to applicable law. The data protection authority will respect the confidentiality of the information provided and any trade secrets contained in the information. Intel's Global Privacy Officer will be responsible for liaising with the European data protection authorities for this purpose.

2.5 AUDITS BY EUROPEAN DATA PROTECTION AUTHORITIES

Where any Intel company subject to the Rules is located within the jurisdiction of a data protection authority based in Europe, Intel agrees that data protection authority may audit that Intel company for the purpose of reviewing compliance with the Rules.

Any audit by a data protection authority will be carried out in accordance with the applicable law of the country in which the Intel company is located. In the case of an Intel company located outside Europe, the audit will be carried out in accordance with the applicable law of the European country from which the personal information is transferred under the Rules.

Intel companies will co-operate and assist each other and the Intel Privacy Office when hosting audits by national data protection authorities. Where required, Intel will make the necessary personnel available for dialogue with a European data protection authority in relation to the audit reviewing compliance with the Rules. Where appropriate, the relevant data protection authority will provide Intel with reasonable prior written notice of its intention to carry out an audit. Audits will be conducted during normal business hours, with full respect to the confidentiality of the information obtained and to the trade secrets of Intel (see also Appendix 4, Co-operation Procedure). Intel's Global Privacy Officer will also be responsible for liaising with the European data protection authorities for this purpose.

INTEL CORPORATE PRIVACY RULES

APPENDIX 3 – COMPLAINT HANDLING PROCEDURE

1. Background

The purpose of the Intel Corporate Privacy Rules (**Rules**) is to establish Intel's approach to compliance with privacy law, also known as data protection law. This document provides an overview of the steps Intel takes when responding to complaints from individuals regarding Intel's collection and use of their personal information.

If an individual, whose information is collected and used by Intel believes Intel has not complied with the Intel Corporate Privacy Rules, that individual may raise the matter with Intel's Global Privacy Officer.

The individual may also raise the matter with the relevant national data protection authority.

In addition, an individual whose information is collected and used by Intel in Europe and transferred outside Europe may be able to make a claim against Intel, either in the courts of the European country of the Intel company that collected and used the information or in the English courts.

Individuals entitled to these rights will be notified accordingly as part of the complaints handling procedure as described below.

2. Approach

2.1 MAKING A COMPLAINT

An individual can bring a complaint by contacting the Intel Privacy Office:

- Online at: www.intel.com/privacy
- Using email to: privacy.feedback@intel.com
- In writing to:
Intel Corporation
ATTN: Privacy
2200 Mission College Blvd.
Santa Clara,
CA 95054
USA
- Intel's offices, programs, contact centers and employees are also required to direct privacy-related enquiries to the Intel Privacy Office in a timely manner.

2.2 INTEL'S RESPONSE

The Intel Privacy Office is responsible for responding to complaints, working with colleagues from the appropriate Intel business groups and Intel companies.

Intel will acknowledge receipt of a complaint within 5 working days of the complaint being received by Intel's Privacy Office.

Intel will respond to a complaint within 28 calendar days of the date the complaint is received by Intel's Privacy Office.

If the complaint is too complex to allow a response within 28 calendar days, Intel will provide the individual with an estimate (not exceeding six months) of when a response will be provided.

The complaint is considered closed on the date Intel communicates its response to the complaint to the individual.

2.3 WHAT HAPPENS IF AN INDIVIDUAL DISPUTES A COMPLAINT RESPONSE?

If an individual disputes Intel's response to a complaint made pursuant to this Appendix, or to a Request made pursuant to Appendix 1, the Intel Global Privacy Officer will be notified, and the appropriate resources will be assigned to review the response process.

After the response process has been reviewed the Intel Global Privacy Officer will inform the individual whether or not Intel has decided to review the response.

If Intel decides to review the response, Intel will promptly inform the individual of the process for carrying out that review. Intel will respond to the individual within a reasonable period, which will not be longer than six months after the decision to carry out that review. Intel may need to meet with the individual as part of the review process. Following completion of the review process, the Intel Global Privacy Officer will inform the individual whether the original response has been upheld, or communicate a new response.

Intel will ensure that any issues or instances of non-compliance with the Rules identified during the carrying out of the Personal Information Request Procedure set out in Appendix 1 or the Complaint Handling Procedure set out in this Appendix are brought to the attention of Intel's Global Privacy Officer and representatives of Intel's company management (including, where appropriate, Intel's Corporate Officers, Executive Officers and/or Board of Directors) as required, and that appropriate corrective actions are taken to ensure compliance.

If an individual whose information is collected and used by Intel in Europe and transferred to Intel companies outside Europe is not satisfied with the way a complaint has been handled the individual has the right to complain to a European data protection authority. The individual may also lodge a claim with a court of competent jurisdiction. Individuals entitled to such rights will be notified accordingly as part of the complaints handling procedure.

INTEL CORPORATE PRIVACY RULES

APPENDIX 4 – CO-OPERATION PROCEDURE

1. Background

The purpose of the Intel Corporate Privacy Rules (**Rules**) is to establish Intel's approach to compliance with privacy law, also known as data protection law.

This document describes how Intel companies will co-operate with each other and with the European⁵ data protection authorities in relation to the Rules.

The provision of any information under this Co-operation Procedure shall be subject to applicable law. The data protection authorities will respect the confidentiality of any information provided and any trade secrets contained in that information.

2. Approach

2.1 CO-OPERATION BETWEEN INTEL COMPANIES

Intel companies will co-operate and assist each other and the Intel Privacy Office when handling requests or complaints regarding the Rules from individuals or national data protection authorities.

Intel companies will comply with any instructions from IIL requiring the remedy of a breach of the Rules.

2.2 CO-OPERATION WITH EUROPEAN DATA PROTECTION AUTHORITIES

Where required, Intel will make the necessary personnel available for dialogue with a European data protection authority in relation to the Rules.

Intel will actively review and consider:

- any decisions made by relevant European data protection authorities on any data protection law issues that may affect the Rules; and

⁵ References to Europe for the purposes of this document include the EEA and Switzerland

- the views of the Article 29 Data Protection Working Party as outlined in its published guidance on Binding Corporate Rules.

Intel will abide by any formal decision of the applicable data protection authority on any issues related to the interpretation and application of the Rules where a right to appeal is not exercised.

2.3 AUDIT BY EUROPEAN DATA PROTECTION AUTHORITIES

Intel will, upon request by a European data protection authority of competent jurisdiction, provide that authority with a copy of the results of any audit of the Rules conducted under the Audit Protocol (see Appendix 2).

Where any Intel company subject to the Rules is located within the jurisdiction of a data protection authority based in Europe, Intel agrees that data protection authority may audit that Intel company for the purpose of reviewing compliance with the Rules.

Any audit by a data protection authority will be carried out in accordance with the applicable law of the country in which the Intel company is located. In the case of an Intel company located outside Europe, the audit will be carried out in accordance with the applicable law of the European country from which the personal information is transferred under the Rules.

Where appropriate, the relevant data protection authority will provide Intel with reasonable prior written notice of its intention to carry out an audit. Audits will be conducted during normal business hours, with full respect to the confidentiality of the information obtained and to the trade secrets of Intel.

Intel's Global Privacy Officer will also be responsible for liaising with the European data protection authorities for this purpose.

INTEL CORPORATE PRIVACY RULES

APPENDIX 5 – UPDATE PROCEDURE

1. Background

The purpose of the Intel Corporate Privacy Rules (**Rules**) is to establish Intel's approach to compliance with privacy law, also known as data protection law.

This document describes how Intel will communicate changes to the Rules to the European⁶ data protection authorities, Intel companies and to individuals.

2. Approach

2.1 COMMUNICATING CHANGES TO DATA PROTECTION AUTHORITIES

Intel will inform the Irish Data Protection Commissioner and any other relevant European data protection authorities of any change to the Rules. Intel will provide that information within a reasonable time of the changes being made. The Intel Privacy Office is responsible for communicating changes to the Rules, and will also provide a brief explanation of the reasons for any notified changes to the Rules. However, Intel is not obliged to communicate changes to the Rules which are administrative in nature or which have occurred as a result of a change of applicable data protection law in any European country through any legislative, court or supervisory authority measure unless they:

- result in a substantial change to the Rules; or
- affect the authorisation of the Rules by European data protection authorities.

The Intel Privacy Office will maintain an up to date list of the Intel companies bound by the Rules. Intel will send an up to date list of companies to the Irish Data Protection Commissioner and any other relevant European data protection authorities at least once a year.

⁶ References to Europe for the purposes of this document includes the EEA and Switzerland

2.2 COMMUNICATING CHANGES TO INTEL COMPANIES AND INDIVIDUALS

Intel will communicate the amended Rules to the Intel companies bound by the Rules and will publish the amended Rules on Intel's external web site accessible at www.intel.com.

The Rules contain a change log which sets out the revision history of the Rules, including the date the Rules were revised and the details of any revisions made.

2.3 INCLUSION OF NEW INTEL COMPANIES

Intel will ensure that all new Intel companies are considered for inclusion in the list of Intel companies bound by the Rules and the Deed Poll. Intel will also ensure that the necessary legal, administrative, operational and technical measures are in place before a transfer of personal information to or from a new Intel company takes place.

INTEL CORPORATE PRIVACY RULES

APPENDIX 6 – REVISION HISTORY

Version	Date changed	Summary of changes
1.0	23 rd November, 2011	Final version for EU DPA mutual recognition procedure
2.0	28 th January, 2013	Update of Deed Poll “Schedule 1 – Legal Entities” and re-signature
2.1	2 nd April, 2013	Update of Deed Poll “Schedule 1 – Legal Entities” and re-signature
3.0	27 th March, 2014	Update of Deed Poll “Schedule 1 – Legal Entities” and re-signature
4.0	23 rd February, 2015	Update of Deed Poll “Schedule 1 – Legal Entities” and re-signature
4.1	15th December, 2015	Update of Deed Poll “Schedule 1 – Legal Entities” and re-signature

Schedule 3 – Third Party Beneficiary Rights

Individuals whose Personal Information is collected or used by an Intel Entity in Europe and transferred to an Intel Entity outside Europe under the ICPRs may be able to enforce the following third party beneficiary rights against IIL in accordance with Clause 7:

1. to enforce compliance with the ICPRs, including its appendices;
2. to lodge a complaint with a European data protection authority of competent jurisdiction and/or to take action against IIL either in the courts of the jurisdiction in which the Intel Entity responsible for exporting such Personal Information is established or the Irish courts, in accordance with the laws of Ireland in order to enforce compliance with the ICPRs;
3. to make complaints to an Intel Entity within Europe in accordance with the Complaint Handling Procedure set out in Appendix 3 to the ICPRs, seek appropriate redress from IIL as described in Clause 7, including the remedy of any breach of the ICPRs by any Intel Entity outside Europe and, where appropriate, receive compensation from IIL for any damage suffered as a result of a breach of the ICPRs in accordance with the determination of a court or other competent authority;
4. to obtain a copy of the ICPRs and this Deed on request.



The **Intel Corporate Privacy Rules** establish Intel's approach to compliance with privacy law, also known as data protection law, and specifically to transfer of personal information between Intel companies.

The Rules are communicated to all Intel employees and published on the Intel website accessible at www.intel.com.

If you have any questions about the Rules, your rights under the Rules or any other privacy issues you can contact the Intel Privacy Office at the addresses below:

- Internet: www.intel.com/privacy
- Email: privacy.feedback@intel.com
- Address:

Intel Corporation
ATTN: Privacy
2200 Mission College Blvd.
Santa Clara
CA 95054
USA

