

# HP Global Privacy Statement

HP recognizes that privacy is a fundamental human right and further recognizes the importance of privacy, security and data protection to our customers and partners worldwide. As a global organization, with legal entities, business processes, management structures, and technical systems that cross international borders, we strive to provide protections across all of our operations that exceed legal minimums and to deploy consistent, rigorous policies and procedures. As used in this statement, terms such as “we,” “us,” “our,” and “Company” refer to HP branded companies and current and future affiliates, as defined by local law (herein “HP”). Contact information for HP’s Data Protection Officer appears in the “Exercising Your Rights & Contacting Us” section below.


This Privacy Statement (sometimes known as Privacy Policy as prescribed by local law) informs you of our privacy practices and of the choices you can make and rights you can exercise in relation to your personal data. This includes information that may be collected from your online activity, use of devices, and interactions you have with HP offline, such as when you engage with our customer support representatives. This Privacy Statement applies to all HP companies as well as HP- owned websites, domains, services (including device management), applications, subscriptions (i.e., Instant Ink) and products, and those of our subsidiaries (collectively “HP Services”), in the consumer context or while interacting with HP in the business-to-business customer context. For certain HP Services we may provide you with additional privacy information that supplements this Statement. Supplemental Statements for specific products and services can be found [here](#). If you are located in the in the United States or in Mainland China, HP provides the Service to you under either the [HP US Privacy Statement](#) or the [HP Mainland China Privacy Statement](#), accordingly.






This Privacy Statement does not apply to job candidates, HP employees or former employees as it does not cover employment related data, nor to any personal data we process on behalf of our business customers when we provide services. The contracts we have with our business customers control how we process your personal data in this context. If you are a customer, employee, or contractor of one of HP’s business customers and have questions about your personal data we ask that you contact them and, if needed, HP will provide assistance to these HP business customers in responding to your questions.

Throughout this document references to “local law” or “applicable law” refer to local laws applicable to where you reside.

## Our Privacy Principles

We have an accountability-based program, and we are committed to the following principles, which are based on internationally-recognized frameworks and principles of privacy and data protection:

 <p>LAWFULNESS, FAIRNESS &amp; TRANSPARENCY</p>	<p>We process personal data in accordance with local law and with transparency and fairness to you. Our data processing activities are conducted: 1) with your consent; 2) in order to fulfill our obligations to you; 3) for the legitimate purposes of operating our business, advancing innovation and providing a seamless customer experience; or 4) otherwise in accordance with law.</p>
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 <p>NOTICE &amp; CHOICE OF DATA USE</p>	<p>We are transparent and provide clear notice and choice to you about the types of personal data collected and the purposes for which it is collected and processed. We will not use personal data for purposes that are incompatible with these Principles, our Privacy Statement or specific notices associated with HP Services.</p>
 <p>DATA ACCESS</p>	<p>We provide you with reasonable access along with the ability to review, correct, amend, or delete the personal data you have shared with us.</p>
 <p>DATA INTEGRITY &amp; PURPOSE LIMITATION</p>	<p>We only process personal data for the purposes described at the time of collection or for additional compatible purposes in accordance with local law. We take reasonable steps to ensure that personal data is accurate, complete, and current and we only collect personal data which is relevant and limited to what is minimum necessary for the purposes for which it is collected. We will keep personal data for no longer than is necessary for the purposes for which it was collected and then, unless legally required to keep longer, we will securely delete or destroy it.</p>
 <p>DATA SECURITY</p>	<p>To protect personal data against unauthorized use or disclosure we implement strong information security controls in our own operations and offer market-leading products and solutions with high levels of data security protection.</p>
 <p>ACCOUNTABILITY FOR ONWARD TRANSFER</p>	<p>As an accountable organization, we have appropriate policies and procedures that promote good practices, which, taken as a whole, allow us to demonstrate our capacity to comply with applicable privacy laws.</p> <p>Personal data will only be shared with third parties and processors with whom we have a business relationship or manage or support certain aspects of our business operations on our behalf. All parties are obligated by contract, as required by law or regulation, to provide equivalent levels of protection and follow our HP's privacy policies and practices for handling personal data.</p>
 <p>RECOURSE, OVERSIGHT &amp; ENFORCEMENT</p>	<p>We are committed to resolving any concerns regarding your personal data. We voluntarily participate in several international privacy programs that provide recourse to individuals if they feel HP has not adequately respected their rights in accordance with applicable laws</p>

## International Data Transfers

As a global company, it is possible that any information you provide may be transferred to or accessed by HP entities worldwide to perform processing activities such as those described in this Privacy Statement in connection with your use of our products and services. When we engage in such transfers, we will address any

applicable legal requirements on international transfers between countries or territories, such as adequacy decisions, appropriate safeguards, exemptions provided for under data protection law, or international privacy programs set out below, to ensure that any transferred personal data remains protected and secure, wherever it may be. Depending on your country of residence to such transferred data, we rely on the corresponding mechanism (listed purely in alphabetical order) in accordance with applicable local law:

### Adequacy Decisions

HP relies on determinations from relevant authorities (see decisions, for example, from the [UK Government](#), the [European Commission](#), or the [Swiss Federal Council](#)), about whether other countries, territories, international organizations or sectors having adequate levels of data protection. Where this occurs, the personal data is transferred to such third countries in reliance of such adequacy decision.

### APEC Cross-Border Privacy Rules

HP's privacy practices described in this Statement comply with the APEC Cross Border Privacy Rules System ("CBPR"), including transparency, accountability, and choice regarding the collection and use of your personal information, as well as the Privacy Recognition for Processors system ("PRP"). The CBPR and PRP certifications do not cover information that may be collected through downloadable software on third-party platforms. The APEC CBPR and PRP systems provide a framework for organizations to ensure protection of personal information transferred among participating APEC economies. More information about the APEC framework can be found [here](#).

If you have an unresolved privacy or data use concern related to HP's APEC Certification that we have not addressed satisfactorily, please contact [our U.S.-based third-party dispute resolution provider](#) (free of charge).

[View our APEC CBPR certification](#)

[View our APEC PRP certification](#)



### Binding Corporate Rules

International transfers of personal data to countries that don't have an adequacy decision by the European Commission are governed by our HP's Binding Corporate Rules. HP's Binding Corporate Rules ("BCRs") ensure that personal data transferred from the European Economic Area ("EEA") is adequately protected while being processed by any of HP's global entities in accordance with applicable laws. HP transfers of personal data are conducted in accordance with the following approved BCRs:

- HP's EU BCRs for Controller ("EU BCR-C"). Effective in 2011, HP's EU BCR-C covers transfers of the personal data of existing and prospective HP consumer customers, as well as personal data of HP employees and job candidates.
- HP's EU BCRs for Processor ("EU BCR-P") – Approved by the majority of Data Protection Regulators in the EEA and Switzerland, effective in 2018. HP's BCR-P is available to HP's enterprise customers to

facilitate the transfer of their personal data from the EEA.

More information about our HP's BCRs and a list of HP entities covered by them can be found [here](#).

### **Data Privacy Framework Program**

HP complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF), as set forth by the U.S. Department of Commerce. HP has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. HP has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

HP is responsible for the processing of personal data it receives under the DPF and subsequently transfers to a third party acting as an agent on its behalf. HP complies with the DPF Principles for all onward transfers of personal data from the EU, UK, and Switzerland, including the onward transfer liability provisions.

In compliance with the EU-US Data Privacy Framework Principles, HP commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to the DPF Principles. EU and UK individuals, and Swiss individuals with DPF inquiries or complaints should first contact HP through [HP's Chief Privacy and Data Protection Officer form](#).

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, HP commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to BBB, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://bbbprograms.org/programs/all-programs/dpf-consumers/ProcessForConsumers> for more information or to file a complaint. The services of BBB are provided at no cost to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. Further information can be found on the official [DPF website](#).

The Federal Trade Commission has jurisdiction over HP's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

The specific US-based HP entities covered by the DPF include: Compaq Information Technologies, LLC; Hewlett-Packard Company Archives LLC; Hewlett-Packard Enterprises, LLC; HP Health Solutions Inc.; HP Jade Holding LLC; HP R&D Holding LLC; HP US Digital LLC; HPI Bermuda Holdings LLC; HPI Federal LLC; Indigo America, Inc.; HP Hewlett Packard Group LLC; Hewlett-Packard World Trade, LLC; HP Inc.; HP Licensing Holding LLC; HP Technology Holdings LLC; HP USA Manufacturing LLC; HPI Brazil Holdings LLC; HPI J1 Holdings LLC; HPQ Holdings, LLC; PrinterOn America Corporation; Tall Tree Insurance Company; Hewlett-Packard Development Company, L.P.

**EXERCISING YOUR RIGHTS RELATED TO APPROVED INTERNATIONAL TRANSFER MECHANISMS**

If you want to ask for more information related to our participation in the DPF, APEC CBPRs or use of HP’s BCRs, please see our “Exercising Your Rights & Contacting Us” section.

**INTERNATIONAL TRANSFERS TO PARTNERS AND SERVICE PROVIDERS**



The transfer of personal data from the European Economic Area, the United Kingdom, and Switzerland to our partners and service providers is governed by adequacy decisions (for example, formal decisions made by the [UK Government](#), the [European Commission](#), or the [Swiss Federal Council](#)). When we engage in transfers to other countries not covered by adequacy decisions or by the above transfer mechanisms, we use the appropriate safeguards, including contracts such as the [Standard Contractual Clauses](#) published by the European Commission under Commission Implementing Decision 2021. Depending on where you live, HP might use different transfer mechanisms, such as contracts, according to the requirements of applicable law. If you have questions about our transfer mechanisms, please see our “Exercising Your Rights & Contacting Us” section.








**How We Use Data**




We collect, use, disclose, and otherwise process personal data as defined by applicable law to manage your relationship with HP and HP Services and to better serve you when you are using HP Services by personalizing and improving your experience.

Depending on the circumstance, HP may rely on your consent, the fact that the processing is necessary to fulfill a contract with you, or to comply with the law. We may also process your personal data where we believe it is based on legitimate interests, taking into consideration your interests, rights, and expectations. More information is available in our [Data Collection and Use Matrix](#). If you have questions about the legal basis, you can contact the Data Protection Officer by clicking on the [HP’s Chief Privacy and Data Protection Officer form](#).

We use and otherwise process your data for the following business purposes:

	<p><b>CUSTOMER EXPERIENCE</b></p> <p>Providing you with a seamless customer experience by maintaining accurate contact and registration data, delivering comprehensive customer support through a number of mediums such as online messaging and chat centers such as chatbots, communicating with you about offering products, services, subscriptions and features that may interest you and enabling you to participate in contests, outbound satisfaction calls and surveys, customer incentives, benefits, and loyalty rewards. We also use your data to deliver a tailored experience, to personalize the HP Services and communications you receive and to create recommendations based on your use of HP Services.</p>
	<p><b>TRANSACTION SUPPORT</b></p> <p>Assisting you in completing transactions and orders of our products or services, administering your account, processing payments, arranging shipments and deliveries, and facilitating repairs and returns.</p>

	<p><b>PRODUCT SUPPORT &amp; IMPROVEMENT</b></p> <p>Contacting you to inform you or make you aware of non-transactional product features not addressed through Customer Service or Administrative Communications. These include features to improve the performance and operation of our products, solutions, services, and support, including warranty support and timely firmware and software updates and alerts to ensure the continued operation of the device or service. For more information, please see the section on <a href="#">Information Automatically Collected</a>.</p>
	<p><b>ADMINISTRATIVE COMMUNICATIONS</b></p> <p>Contacting you about HP Services. Examples of administrative communications may include responses to your inquiries or requests, service completion or warranty-related communications, safety recall notifications, communications required by law or applicable corporate updates related to mergers, acquisitions, or divestitures.</p>
	<p><b>SECURITY</b></p> <p>Maintaining the integrity and security of our websites, products, features, and services by preventing and detecting security threats, fraud or other criminal or malicious activity that might compromise your information. When you interact with us, we will also take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your personal data. We may also maintain additional security measures, such as CCTV, to safeguard our physical locations.</p>
	<p><b>BUSINESS OPERATIONS</b></p> <p>Conducting ordinary business operations, verifying your identity, making credit decisions if you apply for credit, conducting business research, analytics, planning and strategy, corporate reporting and management, sales related activities, staff training and quality assurance purposes (which may include monitoring or recording calls, if applicable, where you have given us prior consent to do so), and external communications.</p>
	<p><b>RESEARCH &amp; INNOVATION</b></p> <p>Innovating new and existing products, features and services using research and development tools and incorporating data analysis activities.</p>
	<p><b>MARKETING AND ADVERTISING</b></p> <p>Providing personalized promotional offers (in accordance with your Privacy Preferences) on HP Services through e-mail, SMS/text-messages, in application marketing and third party platforms and other selected partner websites (for example, you might see an advertisement for a product on a partner site that you have recently viewed on an HP site). In accordance with your stated communication preferences, we may also share some of your information with selected partners, marketing service providers and digital marketing networks to present advertisements that might interest you in other sites or mobile applications.</p>
	<p><b>COMPLIANCE WITH LAW</b></p> <p>Compliance with applicable laws, regulations, court orders, government, and law</p>

	<p>enforcement requests, to operate our services and products properly, to protect ourselves, our users and our customers, and to solve any customer disputes. The information collected may also be used to investigate security incidents and potential breaches of personal data, notify individuals and third parties of the breach and to prepare to defend lawsuits.</p>
	<p><b>ARTIFICIAL INTELLIGENCE / MACHINE LEARNING</b></p> <p>As user interfaces become more complex and personalized, HP may use data to allow devices to better tailor services towards a customer in terms of the way information or tasks are presented. For example, using your personal data to enhance customer experience around our products and services, such as device security and virtual reality applications.</p>
	<p><b>SERVICE DELIVERY</b></p> <p>Where automatic data collection is strictly necessary for providing HP Services or delivering a product that you have requested. Without the collection of telemetry (such as Printer Usage Data) and personal data we cannot provide certain services of functionality we have agreed to provide to the customer. In addition, we may use automatic data collection to support and improve HP Services and support business operations relating to HP Services.</p>
	<p><b>ACCOUNT MANAGEMENT</b></p> <p>When using our products and services, including our online stores, you may create sign in credentials or an account with HP. When you create these credentials with your e-mail address and password, a unique identifier is created that allows you to use the same credentials for all our services. Depending on the services you are engaged with, the information associated with your credentials or account may also include delivery address, payment card information and history, details of purchased and connected devices, device and connection settings, device service usage data, as well as your preferences for recommendations and offers from HP.</p>

## What Data We Collect

Personal data is any information that personally identifies you or from which you could be identified either directly or indirectly. We may collect your personal data through your use of HP Services or during interactions with HP or HP representatives.

The categories of personal data we collect from you depend on the nature of your interaction with us or on the HP Services you use, but may include the following:

### INFORMATION COLLECTED ABOUT YOU

- **Contact Data** – We collect personal and/or business contact information including your first name, last name, mailing address, telephone number, fax number, email address and other similar data and identifiers.
- **Payment Data** – We collect information necessary for processing payments and preventing fraud, including credit/debit card numbers, security code numbers and other related billing information.
- **Account Data** – We collect information such as how you purchased or signed up for HP Services, your transaction, billing and support history, the HP Services you use and anything else relating to the account

you create.

- **Location Data** – We collect geolocation data when you enable location-based services or when you choose to provide location-related information during product registration or when interacting with our website. Location data might be used with consent when the consumer is in need for technical support for services or products.
- **Security Credentials Data** – We collect user IDs, passwords, password hints, and similar security information required for authentication and access to HP accounts.
- **Demographic Data** – We collect, or obtain from third parties, certain demographic data including, for example, country, gender, age, preferred language, and general interest data.
- **Preferences** – We collect information about your preferences and interests as they relate to HP Services (both when you tell us what they are or when we deduce them from what we know about you) and how you prefer to receive communications from us.
- **Social Media Data** – We provide social media features that enable you to share information with your social networks and to interact with us on various social media platforms. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media platforms you use to make sure you understand the information that is collected, used, and shared by those platforms.
- **Body and biometric Data** – HP only uses biometric data with our 3D printer to provide custom 3D parts requiring such data. With your permission, some of our products may collect biometric information (such as a fingerprint) to perform functions on the device.
- **Anonymous or Aggregated Data** – We collect anonymous answers to surveys and aggregated information about the response rate to these surveys.
- **Other Unique Identifying Information** – Examples of other unique information that we collect from you include product serial numbers, information you provide when you interact in-person, online or by phone or mail with our services centers, help desks or other customer support channels, your written, voice or video responses to customer surveys or contests or additional information you have provided to us to facilitate delivery of HP Services and to respond to your inquiries. We may also record information about you that you provide to us by phone, online, or by email. We record telephone communications in accordance with applicable laws, and when required, when you have given us prior consent. If you apply for instant credit, we may ask you to provide additional personal data such as salary, government-issued identification number, banking/financial account information, and other information (for example from credit reporting agencies) for authentication purposes and to verify credit worthiness.
- **Specific HP-Service Data Collection** – Select HP Services, such as HP Gaming and Immersive Applications may collect additional types of data to enable functionality and specialized features. To learn more about a specific HP Service, [please click here](#).

#### **INFORMATION AUTOMATICALLY COLLECTED**

- **Printer Usage Data** – We collect printer usage data such as pages printed, print mode, media used, ink or toner cartridge type (in particular, whether non-original cartridges, or cartridges with a non-HP chip or electronic circuitry are used), file type printed (.pdf, .jpg, etc.), application used for printing (Word, Excel, Adobe Photoshop, etc.), file size, time stamp, and usage and status of other printer supplies. We do not scan or collect the content of any file or information that might be displayed by an application.
- **Device Data** – We collect information about your computer, printer and/or device such as operating system, firmware, amount of memory, region, language, time zone, model number, first start date, age of device, device manufacture date, browser version, device manufacturer, connection port, warranty status, unique device identifiers, advertising identifiers and additional technical information that varies by product.
- **Application Data** – We collect information related to HP applications such as location, language, software



versions, data sharing choices and update details. In cases where we incorporate technologies from third parties, data may be shared between the third party and HP and appropriate notice will be provided at the application level.

- **Performance Data** – We collect information regarding the performance of individual device hardware components, firmware, software, and applications. Examples of the data we collect include information relating to memory and processor performance, environmental conditions and systems failures, printing events, features, and alerts used such as “Low on Ink” warnings, use of photo cards, fax, scan, embedded web server, and additional technical information that varies by device.
- **Website Browsing Data** – We collect information about your visits and your activity on our HP websites, applications or websites “powered by” another company on our behalf including the content (and any ads) that you view and interact with, the address of the website from which you arrived and other clickstream behavior (such as the pages you view, the links you click or which items you've added to your shopping basket). Some of this information is collected using cookies, web beacons, embedded web links and similar technologies. To learn more, please read our [Use of Cookies and other Technologies Statement](#).
- **Pseudonymized or Aggregated Data** – We collect anonymous and aggregated information about how our HP Services are used. In certain cases, for identified data, we apply a process of de-identification or pseudonymization to your data to make it reasonably unlikely to identify you through the use of that data with available technology.
- **Anonymized Data** – In some cases, for example at the end of the retention period, we will anonymize your data to make it technically reasonably unlikely to identify you.

#### INFORMATION FROM THIRD-PARTY SOURCES

We collect data from the following third parties:

- **Data brokers, social media networks and advertising networks** – Commercially-available data such as name, address, email address, preferences, interests, and certain demographic data. For example, personal data may be collected when you access our applications through social media logins (i.e., logging in to our applications using your social media credentials) or third-party platform credentials. The basic details we receive may depend on your social network or third-party platform account privacy settings.
- **HP Partners** – If you purchase HP Services from an HP partner, we may receive certain information about your purchase from that partner. We may also receive cookies data and insights.
- **Fraud prevention or credit reporting agencies** – Data collected to prevent fraud and in connection with credit determinations.
- **HP Enterprise Customers** – In order to provide certain HP Services at an enterprise level, your business contact data may be provided to HP by a designated entity within your business or enterprise (such as a member of your IT department).
- **Analytics Providers** – We also receive non-personal data, such as aggregated or de-identified demographic/profile data, from third-party sources including selected partners and companies that specialize in providing enterprise data, analytics, and software as a service.

In some cases, we link or combine the information that we collect from the different sources outlined above with the information we collect directly from you in order to ensure data accuracy and offer a superior customer experience when providing you with better personalized services, content, marketing and ads. For example, we compare the geographic information acquired from commercial sources with the IP address to derive your general geographic area. Information may also be linked via a unique identifier such as a cookie or account number.

Where necessary, we obtain information to conduct due diligence checks on business contacts as part of our

anti-corruption compliance program and in accordance with our legal obligations.

#### **IF YOU CHOOSE NOT TO PROVIDE DATA**

You are not required to share the personal data that we request, however, if you choose not to share the information, as permitted by local law, in some cases we will not be able to provide you with some HP Services, certain specialized features or be able to effectively respond to any queries you may have.

## Sensitive Data

In certain situations, some personal data we collect may be considered sensitive as defined by local law. We will always ensure that such processing is lawful as outlined in this Privacy Statement and as otherwise legally permitted. Sensitive data will always be processed with your consent. This will be voluntary, and you may decide whether or not to give consent. We will implement robust measures to protect such information. We also take reasonable steps to ensure that the information is adequate, necessary, and limited to its intended purpose in accordance with this Privacy Statement.

When contacting HP through its channels, please refrain from communicating sensitive personal data or any other personal data that is not necessary.

## Children's Privacy

Unless otherwise stated for a specific product or service, HP Services are made for the general public. HP does not knowingly collect data from children as defined by local law without the previous consent of their parents or legal guardians or as otherwise permitted by applicable law. If you are a parent or guardian and you believe we have inadvertently collected information from your child or used/shared information from your child through our products and services without your consent, please contact us at [HP's Chief Privacy and Data Protection Officer](#) and we will remove the data to the extent required by applicable law.

## How We Retain and Keep Your Data Secure

To prevent loss, unauthorized access, use or disclosure and to ensure the appropriate use of your information, we utilize reasonable and appropriate physical, technical, and administrative procedures to safeguard the information we collect and process. HP retains data as required or permitted by law and while the data continues to have a legitimate business purpose.

When collecting, transferring, or storing sensitive information such as financial information, we use a variety of additional security technologies and procedures to help protect your personal data from unauthorized access, use, or disclosure. When we transmit highly confidential information (such as credit card number or password) over the internet, we protect it through the use of encryption, such as later versions of the Transport Layer Security ("TLS") protocol.

As part of real-time payment processing, we also subscribe to fraud management services. This service provides us with an extra level of security to guard against credit card fraud and to protect your financial data in accordance with industry standards.

We keep your personal data for as long as necessary to provide you with HP Services, for legitimate and essential business purposes (such as making data-driven business decisions) complying with our legal

obligations, and resolving disputes. HP is committed to protecting the privacy of all personal data processed and aims to ensure that personal data is not kept for longer than is necessary for the purpose for which it was collected, held, and processed. The retention periods for HP held personal data vary depending on whether that data is held as part of a legally required business record.

Personal data contained in records, including records relating to customer and vendor transactions, are maintained while active and as required by local law. Personal data contained in non-records is managed in accordance with the Personal Data Retention Policy, which sets retention limits. Following the expiration of the relevant retention period, information is permanently erased and destroyed in a manner where it cannot be reproduced.

At your request, we will delete or anonymize your personal data so that it no longer identifies you, unless we are legally allowed or required to maintain certain personal data. Because of the complexity of deleting data from inactive long-term backups, we can't delete personal data that is inactive. If for any reason the data from backups is restored, we will anonymize or delete the data from active systems.

## How We Share Data

We will only share your personal data as follows, when applicable, only with the appropriate contractual obligations in place. You can find more information on the categories of recipients with whom we have disclosed personal data by reviewing our [Data Collection and Use Matrix](#), or by contacting us by using our [HP's Chief Privacy and Data Protection Officer form](#).

### **SHARING WITH HP CONTROLLED COMPANIES/SUBSIDIARIES**

We may transfer your personal data to other HP entities in the US and worldwide for the purposes outlined in this Privacy Statement. For details about the specific territories where HP entities are located, you can see the "Exercising Your Rights & Contacting Us" section. To ensure that your personal data is secure and as part of our participation in the [APEC Cross Border Privacy Rules](#), the [Data Privacy Framework Program](#), and our use of [Binding Corporate Rules](#), HP entities are contractually bound to comply with our privacy requirements.

Furthermore, our privacy guidelines are communicated to our HP employees on an annual basis as part of our mandatory training.

### **SHARING WITH SERVICE PROVIDERS & PARTNERS**

We engage service providers or partners to manage or support certain aspects of our business operations on our behalf. These service providers or partners may be located in the US or in other global locations and may provide services such as credit card processing and fraud management services, customer support, sales pursuits on our behalf, order fulfillment, product delivery, content personalization, advertising and marketing activities (including digital and personalized advertising), IT services, email service providers, data hosting, live-help, debt collection and management, customer satisfaction surveys or support of HP websites. Our service providers and partners are required by contract to safeguard any personal data they receive from us and are prohibited from using the personal data for any purpose other than to perform the services as instructed by HP. In some cases, HP might contact you to measure your satisfaction with the delivery of our products and services provided by those service providers and partners.

## **SHARING OTHER INFORMATION WITH ADVERTISERS**

We may also transfer information about you to advertising partners (including the ad networks, ad-serving companies, and other service providers we may use) so that they may recognize your devices and deliver interest-based content and advertisements to you. The information may include your name, postal address, email, device ID, or other identifier in encrypted form. The providers may process the information in hashed or de-identified form. These providers may collect additional information from you (such as your IP address and information about your browser or operating system) and may combine information about you with information from other companies in data sharing cooperatives in which we participate. For more information, please read the "[HP Communications section](#)".

## **SHARING WITH OTHER THIRD PARTIES**

We may also share your personal data with: (i) credit reference and fraud prevention agencies; (ii) debt collection agencies (for outstanding debts with us); or (iii) insurance providers if you have purchased an insurance policy through us (e.g. Care Packs). If you choose to provide personal data to other companies, that personal data will be handled according to the privacy policy of those companies, which may differ from HP's policies and practices.

## **CORPORATE TRANSACTIONS**

Circumstances may arise where, whether for strategic or other business reasons, HP decides to sell, buy, merge or otherwise reorganize businesses. In such transactions, we may disclose or transfer your personal data to prospective or actual purchasers or receive personal data from sellers. Our practice is to seek appropriate protection for your personal data in these types of transactions.

## **COMPLIANCE WITH LAW**

We may also share your personal data when we believe, in good faith, that we have an obligation to: (i) respond to duly authorized information requests of law enforcement agencies, regulators, courts and other public authorities, including to meet national security or other law enforcement requirements; (ii) comply with any law, regulation, subpoena, or court order; (iii) investigate and help prevent security threats, fraud or other criminal or malicious activity; (iv) enforce/protect the rights and properties of HP or its subsidiaries; or (v) protect the rights or personal safety of HP, our employees, and third parties on or using HP property when allowed and in line with the requirements of applicable law.

## **OTHER DATA SHARING PRACTICES**

We do not, and will not, sell personal data to third parties. We do permit third parties to collect the personal data described above through our Services and share personal data with third parties for business purposes as described in this Privacy Statement. For example, this includes providing advertising on our Services and elsewhere based on users' online activities over time and across different sites, services, and devices (so-called "interest-based advertising"). The information practices of these third parties are not covered by this Privacy Statement.

## **HP Communications**

You can make or change your choices regarding subscription or general communications from HP at the data collection point or by using other methods, which are described in this section. These options do not apply to

communications primarily for the purpose of administering order completion, contracts, support, product safety warnings, driver updates, or other administrative and transactional notices where the primary purpose of these communications is not promotional in nature.

## MARKETING & SUBSCRIPTION COMMUNICATIONS

HP marketing communications provide information about products, services, and/or support and you can select how these communications are delivered – e.g., via postal mail, email, fax, telephone, or social media platforms. Marketing communications may include new product or services information, special offers, personalized content, targeted advertising, or invitations to participate in market research or compliance reviews. Subscription communications include email newsletters, software updates, etc., that may be expressly requested by you or which you consented to receive.

You may Opt-out of receiving these general communications by using one of the following methods:

- Select the email's "Opt out" or "Unsubscribe" link, or follow the instructions included in each email communication.
- Submit a request at the [HP's Chief Privacy and Data Protection Officer form](#).
- To unsubscribe from messages delivered to mobile phones via SMS, reply to the message with the words "STOP" or "END."

You can also disable automatic data collection tools, such as web beacons, in email messages by not downloading images contained in messages you receive (this feature varies depending on the email software used on your personal computer). However, doing this may not always disable data collections in the email message due to specific email software capabilities. For more information about this, please refer to the information provided by your email software or service provider.

## COOKIES AND CHOICES

HP provides you with choices about the setting of cookies and other automatic data collection tools through our Cookie Preferences Center. You can learn more about our use of these tools in our [Use of Cookies and other Technologies Statement](#). You can adjust your preferences by visiting our Cookie Preferences Center.

## Exercising Your Rights & Contacting Us

Worldwide privacy and data protection laws give you certain rights, which can be exercised before a data controller. HP has committed to provide you with means to exercise the following rights:

- *Right to Access* – You have the right to ask us for a copy of any personal data that you have provided to us or that we maintain about you.
- *Right to Be Informed* – You 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 you.
- *Right to Portability* – You have the right to obtain the personal data you provide with your consent or in

connection with a contract in a structured, machine-readable format and ask us to transfer it to another data controller.

- [Right to Rectification](#) – You have the right to request from us to update, amend, correct, or rectify your personal data.
- [Right to Erasure](#) – You have the right to request deletion or destruction of your personal data if there is no compelling reason for continued processing of said data in accordance with applicable law.
- [Right to Restriction of Processing](#) – Under certain limited circumstances when legally provided, you have the right to restrict the processing of your data. This means that the data will not be actively used for the original purpose, but will be maintained to exercise our legitimate rights.
- [Right to Withdrawal of Consent](#) – You have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
- [Right to Object](#) – You have the right to object to the processing of your personal data in some circumstances, including when we are using your data for direct marketing or to create a marketing profile. Please see the “HP Communications” section for guidance on how to exercise your rights and to manage your preferences for marketing and subscription communications. In some cases, you may also have the right to object at any time to processing personal data on the grounds of legitimate interests.
- [Right to Object Automated Decision-Making and Profiling](#) – In case automated decision-making and profiling occur, HP will take the appropriate steps to ensure it takes place as required by applicable law. Where it occurs, you may exercise your right to object to automated decision-making that would significantly affect you – including your right to obtain human intervention on our part, to express your point of view and to contest the decision, as required by local law.

With regards to the right to withdraw your consent to the processing of your personal data by HP at any time, please see our [Data Collection and Use Matrix](#) to learn more about the specific categories of personal data that HP processes, the legal basis tied to each one of them, and the specific purposes for which the personal data is processed. Please be aware that after withdrawing your consent, HP will not be able to process your data for the purposes for which you provided consent. If you have questions about the legal basis, you can contact us by clicking on the [HP’s Chief Privacy and Data Protection Officer form](#).

We will not discriminate against you for exercising your rights and choices, although some of the functionality and features available on HP Services may change or no longer be available to you. Any difference in the Services is related to the value provided.

In certain cases, these rights may be limited, for example if fulfilling your request would reveal personal data about another person or if you ask us to delete data which we are required by law to keep.

## **YOUR RIGHTS IN RELATION TO INTERNATIONAL DATA TRANSFERS**

You have the right to be informed, when applicable, about our participation in the DPF, APEC CBPRs, or use of HP’s BCRs or contract mechanisms (e.g., EU Standard Contractual Clauses) for the international transfer of your personal data. You can contact [HP’s Chief Privacy and Data Protection Officer](#) to ask for information on how these transfer mechanisms apply to you or to ask for a copy of the Standard Contractual Clauses, where applicable.

For more information related to our participation in the DPF, APEC CBPRs or use of our HP’s BCRs, please read our section about our International Data Transfers.

## CONTROL OF AUTOMATIC DATA COLLECTION IN HP PRODUCTS

In addition to the privacy controls available to you via this Privacy Statement, you can also control your device data collection. In some instances, product usage data (not content of files) is collected and processed in order to deliver you the essential functionality of an HP Service, such as remote printing, Instant Ink or other web-enabled services. You can control device data collection yourself through your device settings and preferences. HP is not in a position to adjust your data collection settings without your active participation. Disabling data collection may affect the availability or functionality of such services. Data collected for the fulfilment of such essential functionality will not be processed for direct marketing purposes. If you need assistance in adjusting your data collection settings, please contact HP Customer Support with your device details.

## HOW TO EXERCISE YOUR PRIVACY RIGHTS AND MAKE YOUR PRIVACY REQUESTS

To exercise your rights, or if you have any questions or concerns about our Privacy Statement and our privacy practices, our collection and use of your data or a possible breach of local privacy laws, you can submit your privacy requests by clicking on the [HP's Chief Privacy and Data Protection Officer form](#) or write to us at the appropriate address below:

Country	Address
<b>Europe</b>	
Austria	HP Austria GmbH mit Hauptsitz in der Technologiestrasse 5, 1120 Wien
Belgium/Flemish	HP Belgium BVBA met een hoofdkantoor op Hermeslaan 1a, 1831 Machelen
Belgium/French	HP Belgium SPRL, dont le siège social est sis à Hermeslaan 1a, 1831 Machelen
Bulgaria	HP Inc Bulgaria EOOD със седалище Mladost Region 258, Ring road Blvd., Business center Kampanite, 1715 Sofia
Croatia	HP Computing and Printing Zagreb d.o.o. sa sjedištem u Radnička cesta 41, 10000 Zagreb
Cyprus	HP Printing and Personal Systems Hellas Ε.Π.Ε, με έδρα της εταιρείας στην οδό Τζαβέλλα 1-3, 152 31 Χαλάνδρι
Czech Republic	HP Inc Czech Republic s. r. o., jejíž sídlo je registrováno na adrese Michle, Vyskocilova 1/1410, 140 00 Praha 4
Denmark	HP Inc Danmark ApS med hovedkontor Engholm Parkvej 8, 3433 Allerød
Estonia	HP Finland Oy, äriaadress Piispankalliontie, 02200, Espoo, Finland
Finland	HP Finland Oy, jonka pääkonttori on osoitteessa Piispankalliontie, 02200 Espoo
France	HP France SAS, 14 rue de la Verrerie – CS 40012 – 92197 Meudon cedex – France
Germany	HP Deutschland GmbH Herrenberger Straße 140 71034 Böblingen

Greece	HP Printing and Personal Systems Hellas E.Π.Ε, με έδρα της εταιρείας στην οδό Τζαβέλλα 1-3, 152
Hungary	HP Inc Hungary Ltd. (Székhelye: Aliz utca 1, H-1117 Budapest)
Ireland	HP Technology Ireland Ltd, Liffey Valley Office Campus, 1st Floor, Block B, Quarryvale, Co. Dublin, D22 X0Y3, Ireland
Italy	HP Italy S.r.l. con sede principale presso l'indirizzo Via Carlo Donat Cattin, 5 - 20063 Cernusco sul Naviglio (MI)
Latvia	Kompānija HP Finland Oy, kuras biroja adrese ir Piispankalliontie, 02200 Espoo, Finland
Lithuania	HP Finland Oy, kurios registruotoji buveinė yra Piispankalliontie, 02200 Espoo, Finland
Luxembourg	HP Belgium SPRL, dont le siège social est sis à Hermeslaan 1a, 1831 Machelen
Netherlands	HP Nederland B.V. Krijgsman 75, 1186 DR Amstelveen, The Netherlands
Norway	HP Norge AS med hovedkontor i Rolfsbuktveien 4B, 1364 Fornebu
Poland	HP Inc Polska sp. z o.o. z siedzibą pod adresem Ul. Szturmowa 2A, 02-678 Warszawa
Portugal	HPCP – Computing and Printing Portugal, Unipessoal, Lda., com sede na Building Sancho I Quinta da Fonte, 2740-244 Porto Salvo, Lisboa, Oeiras
Romania	HP Inc Romania SRL, Building E, 2nd floor, 2nd District, 6 Dimitrie Pompeiu Boulevard, Bucarest
Slovak Republic	HP Inc Slovakia, s.r.o., ktorej sídlo je registrované na adrese Galvaniho 7, 821 04 Bratislava
Slovenia	HP Computing and Printing Zagreb d.o.o., s sedežem na naslovu Radnicka cesta 41, V. Floor, Zagreb, Croatia
Spain	HP Printing and Computing Solutions S.L.U., Calle José Echegaray 18, Parque Empresarial 28232, Las Rozas, Madrid
Sweden	Gustav III:s boulevard 30 169 73 Solna, Sweden
Switzerland	HP Schweiz GmbH ayant son siège social à Ueberlandstrasse 1, 8600 Dübendorf
Turkey	Hewlett Packard Teknoloji Çözümleri Ltd.Şti" adresinde bulunan "Saray Mahallesi Dr. Adnan Büyükdeniz Cad. No:4 Kat 7-8 Umraniye / İstanbul
UK	HP Inc UK Limited; HP UK Development Limited: Earley West, 300 Thames Valley Park Drive, Reading, Berkshire, RG6 1PT
<b>Americas</b>	



Argentina	HP Inc Argentina S.R.L. : 3616 Vedia Street, 7th Floor, City of Buenos Aires, Argentina
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
Canada	HP Canada Co. HP Canada Cie: 1300-1969 Upper Water Street, Purdy's Wharf Tower II, Halifax, NS, B3J 3R7, Canada
Chile	HP Inc Chile Comercial Limitada: Mariano Sánchez Fontecilla, 310, Piso 13, Las Condes, Santiago, CP 7550296, Chile
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
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
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
Puerto Rico	HP Puerto Rico LLC: Metro Office Park, Parque 7, Street 1 Suite 204, Guaynabo, 00968, Puerto Rico
<b>Asia-Pacific</b>	
Australia	HP PPS Australia Pty Ltd: Rhodes Corporate Park, Building F, Level 5, 1 Homebush Bay Drive, Rhodes, NSW 2138, Australia
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
India	HP Computing and Printing Systems India Private Limited: 24 Salarpuria Arena, Hosur Main Road, Adugodu, 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
Japan	HP Japan Inc.: Shinagawa Season Terrace, 2-70 Konan 1-chome, Minato-ku, Tokyo, Japan

Korea	HP Korea Inc: 83 Uisadangdaero, Youngdeungpo-gu, 14-15th Fl, Seoul, Korea (the Republic of)
Malaysia	HP PPS Malaysia Sdn. Bhd: Suite 13.03, 13th Floor, Menara Tan & tan, 207 Jalan Tan Razak, Kuala Lumpur, 50400, Malaysia
New Zealand	HP New Zealand: KPMG, 18 Viaduct Harbour Avenue, Auckland, 1010, New Zealand
Pakistan	HP Pakistan (Private) Limited: 49, Blue Area, Fazl-ul-Haq Road, A. F. Rerguson & Co. Chartered Accountants, PIA Bulding, 3rd Floor, Islamabad, Pakistan
Philippines	HP PPS Philippines Inc.: 37th Floor, Robinson's Summit Center, 6783 Ayala Avenue, Makati City, Philippines
Singapore	HP Singapore (Private) Limited: 1 Depot Close, Singapore 109841, Singapore
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
Vietnam	HP Technology Vietnam Company Ltd: 29 Le Duan Street, Saigon Tower, Level 10, Dist 1, Ho Chi Minh City, Vietnam
<b>Rest of the world</b>	
Israel	HP Israel Ltd: 8B Hatzoran Street, Netanya Industrial Park, Netanya, 4250608, Israel
Saudi Arabia	HP KSA Ltd.: Al Khaiyria Bldg. King Fahad Highway, North Tower,14th Floor, P.O. Box 295163 – Riyadh 11351, Riyadh, Saudi Arabia
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
Morocco	HP PPS Maroc: Numéro 5, 4ème étage, Illot A5, Immeuble 5, Crystal I, Casablanca Marina, Boulevard des Almohades, Casablanca, Morocco
Nigeria	HP Computing and Printing Nigeria Ltd: 7th Floor, 21 Lugard Avenue, Ikoyi, Lagos, Nigeria
South Africa	HP South Africa Proprietary Limited: 12 Autumn Street, Rivonia, 2128 Sandton, South Africa

## HOW WE MANAGE YOUR PRIVACY REQUESTS

All communications will be treated confidentially. Upon receipt of your communication, our DPO representative will contact you within a reasonable time to respond to your questions or concerns. In some cases, we may request further information to verify your identity complete your request, identify the service your request refers to, clarify the nature of your request, remedy any deficiencies with your request, or let you know if we

need more time, as permitted in applicable law. Please refrain from sending us sensitive personal data.

You can designate someone else to make a request on your behalf. To protect your information, we will ask for legal proof of this authorization to submit a request on your behalf. If applicable, we will contact you to confirm that you have provided the authorized agent with permission to submit the request before we respond to your authorized agent's request.

#### **TIMING**

We aim to ensure that your concerns are resolved in a timely and appropriate manner. If we fail to take any action regarding your request to exercise rights or decline to respond, you have the right to contact the supervisory authority in the country where you live or work, or where you consider that the data protection rules have been breached or seek a remedy through the courts, as prescribed by applicable law.

## Changes to Our Privacy Statement

If we modify our Privacy Statement, we will post the revised statement here, with an updated revision date. If we make significant changes to our Privacy Statement that materially alter our privacy practices, we may also notify you by other means, such as sending an email or posting a notice on our corporate website and/or social media pages prior to the changes taking effect.

Date Posted: September 2023

[Archive of previous privacy policies](#)