



**Intel Corporate Privacy Rules:
EU Controller Policy**

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Part I: Introduction

This Intel Corporate Privacy Rules: Controller Policy ("**Controller Policy**") establishes Intel's approach to compliance with European data protection laws when processing personal information for its own purposes as a controller.

Scope of this Controller Policy

Article 44 of the EU General Data Protection Regulation ("**GDPR**") prohibits transfers of personal information to a country or international organisation outside of the European Economic Area unless a European Commission adequacy determination applies (pursuant to Article 45 of the GDPR), the data exporter and data importer have implemented appropriate safeguards (pursuant to Article 46 of the GDPR), or a derogation applies (pursuant to Article 49 of the GDPR).

This Controller Policy therefore applies only to transfers of personal information in the circumstances above, i.e. transfers of personal information between Intel group companies as controllers (or where a group member acts as processor on behalf of another group member) which are restricted pursuant to Article 44 of the GDPR. It provides appropriate safeguards for the personal information which is transferred between those group members pursuant to Articles 46(1) and 46(2)(b) of the GDPR. This Controller Policy applies regardless of whether our group members process personal information by manual (when it forms part of a filing system or is intended to form part of a filing system) or by automated means.

For an explanation of some of the terms used in this Controller Policy, like "controller", "process", "processor", and "personal information", please see the section headed "Important terms used in this Controller Policy" below.

Types of personal information within the scope of this Controller Policy

This Controller Policy applies to all personal information that we process as a controller, including personal information processed in the course of our business activities, employment administration and vendor management:

- **Human resources data:** including personal information of past and current employees, individual consultants, independent contractors, temporary workers and job applicants;
- **Customer relationship management data:** including personal information relating to representatives of business customers who use our business services and products, and of potential customers; and
- **Supply chain management data:** including personal information of individual contractors and of account managers and workers of third party suppliers who provide products and services to us.

Appendix 11 (Material Scope of the Controller Policy) sets out a more detailed description of the personal information and the intra-group transfers that are covered by this Controller Policy.

Our collective responsibility to comply with this Controller Policy

All group members and their workers must comply with, and respect, this Controller Policy when processing personal information as a controller, irrespective of the country in which they are located.

In particular, all group members who process personal information as a controller must comply with:

- the rules set out in **Part II** of this Controller Policy;
- the practical commitments set out in **Part III** of this Controller Policy;
- the third party beneficiary rights set out in **Part IV**; and
- the policies and procedures appended in **Part V** of this Controller Policy.

Management commitment and consequences of non-compliance

Intel's management is fully committed to ensuring that all group members and their workers comply with this Controller Policy at all times.

Non-compliance may cause Intel to be subject to sanctions imposed by competent data protection authorities and courts, and may cause harm or distress to individuals whose personal information has not been protected in accordance with the practices described in this Controller Policy.

In recognition of the gravity of these risks, workers who do not comply with this Controller Policy may be subject to disciplinary action, up to and including dismissal.

Where will this Controller Policy be made available?

This Controller Policy is accessible on Intel's corporate website at: <https://www.intel.com/content/www/us/en/privacy/eea-binding-corporate-rules.html>

Important terms used in this Controller Policy

For the purposes of this Controller Policy:

- the term **applicable data protection laws** means the EU General Data Protection Regulation and any other European data protection laws that apply to transfers of personal information under this Controller Policy, ;
- the term **controller** means the natural or legal person which, alone or jointly with others, determines the purposes and means of the processing of personal information. For example, Intel is a controller of its Human Resources records and Customer Relationship Management records;
- the term **criminal personal information** means information about an individual's criminal offences or convictions;
- the term **Europe** (and **European**) as used in this Controller Policy refers to the Member States of the European Economic Area – that is, the Member States of the European Union plus Norway, Lichtenstein, and Iceland;
- the term **group member** means the members of Intel's group of companies listed in Appendix 1;

- the term **personal information** means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that nature personal;
- the term **processing** means any operation or set of operations which is performed on personal information or on sets of personal information, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- the term **processor** means a natural or legal person which processes personal information on behalf of a controller (for example, a third party service provider that is processing personal information in order to provide a service to Intel);
- the term **sensitive personal information** means information that relates to an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation.
- the term **workers** refers to all employees, new hires, individual contractors and consultants, and temporary workers engaged by any Intel group member. All workers must comply with this Controller Policy.

How to raise questions or concerns

If you have any questions regarding this Controller Policy, your rights under this Controller Policy or applicable data protection laws, or any other data protection issues, you can contact Intel's Privacy Office using the details below. Intel's Privacy Office will either deal with the matter directly or forward it to the appropriate person or department within Intel to respond.

Contact: Intel Privacy Office

Webform: <https://www.intel.com/content/www/us/en/forms/privacy-contact-us.html>

Address: Intel Corporation

Attention: Intel Privacy Office

2200 Mission College Blvd.

Santa Clara,

CA 95054

USA

OR

Intel Ireland Limited

Attention: Intel Privacy Office

Collinstown Industrial Park

Leixlip

Co.Kildare

Ireland

W23 CX68

Intel's Privacy Office is responsible for ensuring that changes to this Policy are notified to the group members and to individuals whose personal information is processed by Intel in accordance with [Appendix 9](#) (Updating Procedure).

If you want to exercise any of your data protection rights, please see the data protection rights procedure set out in [Appendix 3](#) (Data Protection Rights Procedure). Alternatively, if you are unhappy about the way in which Intel has used your personal information, you can raise a complaint in accordance with our complaint handling procedure set out in [Appendix 7](#) (Complaint Handling Procedure).

Part II: Our obligations

This Controller Policy applies in all situations where a group member processes personal information anywhere in the world. All workers and group members must comply with the following obligations:

Rule 1 – Lawfulness:

We will ensure that processing is at all times compliant with applicable law and this Controller Policy.

We will at all times comply with any applicable data protection laws, as well as the practices set out in this Controller Policy, when processing personal information.

As such where applicable data protection laws exceed the standards set out in this Controller Policy, we will comply with those laws.

Rule 2 – Fairness and transparency:

We will inform individuals how and why their personal information will be processed.

We will provide individuals with the Fair Information Disclosures (see [Appendix 2](#)) when we process their personal information.

We will take appropriate measures to communicate the Fair Information Disclosures to individuals in a concise, transparent, intelligible and easily accessible form, using clear and plain language. The Fair Information Disclosures shall be provided in writing, or by other means, including, where appropriate, by electronic means. They may be provided orally, at the request of an individual, provided that the identity of that individual is proven by other means.

If we have not obtained personal information directly from the individual him or herself then, in certain limited cases, we may not need to provide the Fair Information Disclosures, as explained in [Appendix 2](#). Where this is the case, the Intel Privacy Office must be informed and will

decide what course of action is appropriate to protect the individual's rights, freedoms and legitimate interests.

Rule 3 – Purpose limitation:

We will process personal information only for specified, explicit and legitimate purposes and not further process that information in a manner that is incompatible with those purposes.

We will only process personal information for specified, explicit and legitimate purposes that have been communicated to the individuals concerned in accordance with Rule 2. We will not process personal information in a way that is incompatible with those purposes, except in accordance with applicable data protection laws or with the individual's consent.

If we intend to process personal information for a purpose which is incompatible with the purpose for which the personal information was originally collected, we may only do so if such further processing is permitted by applicable data protection laws or we have the individual's consent. We will also provide the individual with Fair Information Disclosures about the further processing in accordance with Rule 2.

In assessing whether any processing is compatible with the purpose for which the personal information was originally collected, we will take into account:

- any **link** between the purposes for which the personal information was originally collected and the purposes of the intended further processing;
 - the **context** in which the personal information was collected, and in particular the reasonable expectations of the individuals whose personal information will be processed;
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- the **nature** of the personal information, in particular whether such information may constitute sensitive personal information and/or criminal personal information;
 - the **possible consequences** of the intended further processing for the individuals concerned; and
 - the existence of any **appropriate safeguards** that we have implemented in both the original and intended further processing operations.
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Rule 4 – Data minimisation

We will only process personal information that is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

We will only process personal information that is adequate, relevant and limited in order to properly fulfil the desired processing purposes. We will not process personal information that is unnecessary to achieve those purposes.

Rule 5 – Accuracy:

We will keep personal information accurate and, where necessary, up to date.

We will take appropriate measures to ensure that the information we process is accurate and, where necessary, kept up to date – for example, by giving individuals the ability to inform us when their personal information has changed or become inaccurate.

We will take reasonable steps to ensure inaccurate personal information, having regard to the purposes for which they are processed, are erased or rectified without undue delay.

Rule 6 – Storage limitation: We will not keep personal information in a form which permits identification of individuals for longer than is necessary for the purposes for which that information is processed, except where necessary to comply with applicable legal obligations.

We will only keep personal information for as long as is necessary for the purposes for which it is collected and further processed.

In particular, we will comply with Intel's record retention policies and guidelines as revised and updated from time to time.

Rule 7 – Security, integrity and confidentiality: We will implement appropriate technical and organizational measures designed to protect personal information against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where processing involves transmission of personal information over a network, and against all other unlawful forms of processing.

We will implement appropriate technical and organisational measures to apply a level of security to personal information that is appropriate to the risk for the rights and freedoms of the individuals.

In particular, we will comply with the requirements in the security policies in place within Intel, as revised and updated from time to time, together with any other security procedures relevant to a business area or function.

Any worker who has access to or is involved in the processing of personal information will do so only on instructions from the Intel company on whose behalf the processing is being carried out, and under a duty of confidence.

Rule 8 – Service provider management: Where we appoint a service provider to process personal information on our behalf (i.e. a processor), we

We will ensure that our service providers also adopt will impose strict contractual terms on the service provider that require it:

appropriate security measures when processing personal information.

- to act only on our instructions when processing that information, including with regard to international transfers of personal information;
 - to maintain policies so that that any individuals who have access to the data are subject to a duty of confidence;
 - to have in place appropriate technical and organizational security measures to safeguard the personal information;
 - only to engage a sub-processor if we have given our prior specific or general written authorisation, and on condition the sub-processor agreement protects the personal information to the same standard required of the service provider;
 - to assist us in complying with our obligations as a controller under applicable data protection laws, in particular with respect to reporting data security incidents under Rule 9 and responding to requests from individuals to exercise their data protection rights under Rule 10;
 - to return or permanently destroy the personal information once it has completed its services; and
 - to make available to us all information we may need in order to ensure its compliance with these obligations.
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Rule 9 – Data Incident Reporting:

We will comply with any data incident reporting requirements that exist under applicable law.

When we become aware of an incident that may present a risk to the personal information in our custody or control, we will promptly inform Intel’s Privacy Office who will initiate Intel’s Privacy Incident Response procedures.

The Intel Privacy Office will review the nature and seriousness of the data incident, commence an appropriate investigation aligned with the circumstances, and determine whether it is necessary under applicable data protection laws to notify competent data protection authorities.

In particular:

- If the incident is likely to result in a risk to the rights and freedoms to individuals whose personal information was affected by the incident, the Intel Privacy Office shall notify competent data protection authorities without undue delay and, where feasible, within 72 hours, in accordance with applicable data protection laws.
- If the incident is likely to result in a high risk to individuals whose personal information was affected by the incident, the Intel Privacy Office shall notify those individuals without undue delay in accordance with applicable data protection laws.

The Intel Privacy Office shall be responsible for confirming that any such notifications, where necessary, are made in accordance with applicable data protection law.

Rule 10 – Honouring individuals' data protection European laws provide individuals with certain data protection rights. These include:

rights:

We will enable individuals to exercise their data protection rights in accordance with applicable law.

- *The right of access:* This is a right for an individual to obtain confirmation whether we process personal information about them and, if so, to be provided with details of that personal information and access to it;
 - *The right to rectification:* This is a right for an individual to obtain rectification without undue delay of inaccurate personal information we may process about them.
 - *The right to erasure:* This is a right for an individual to request that we erase personal information about them on certain grounds – for example, where the personal information is no longer necessary to fulfil the purposes for which it was collected. If we have made the personal information public, then (taking account of available technology and the cost of implementation) we will also take reasonable steps, including technical measures, to inform controllers which are processing the personal information that the individual has requested the erasure by such controllers of any links to, or copy or replication of, that personal information.
 - *The right to restriction:* This is a right for an individual to require us to restrict processing of
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personal information about them on certain grounds.

- *The right to data portability:* This is a right for an individual to receive personal information concerning him or her from us in a structured, commonly used and machine-readable format and to transmit that information to another controller, if certain grounds apply. Where technically feasible, this may include direct transmission from Intel to another Controller.
- *The right to object:* This is a right for an individual to object, on grounds relating to their particular situation, to processing of personal information about them, if certain grounds apply.

Where an individual wishes to exercise any of their data protection rights, we will respect those rights in accordance with applicable data protection laws by following the Data Protection Rights Procedure (see [Appendix 3](#)).

In addition, the relevant Intel group member shall communicate any rectification or erasure of personal information or restriction of processing carried out in accordance with this rule to each recipient to whom the Personal Information have been disclosed, unless this proves impossible or involves disproportionate effort. We will inform the individual about those recipients if the individual requests it.

Rule 11– Ensuring adequate protection for international transfers:

We will not transfer personal information internationally without ensuring adequate protection for the information in accordance with applicable law.

European laws prohibit international transfers of personal information to third countries unless appropriate safeguards are in place so that the transferred data remains protected to the standard required in the country or region from which it is transferred or a data transfer derogation applies under applicable data protection laws (for example, the individual has explicitly consented to the transfer).

Where these requirements exist, we will comply with them. Whenever transferring personal information internationally, the Intel Privacy Office must be consulted so that they can ensure appropriate safeguards, such as this Controller Policy or standard contractual clauses (for transfers of personal information from Europe), have been implemented to protect the personal information being transferred or otherwise that a data transfer derogation applies.

No group member may transfer personal information internationally unless and until such measures as are necessary to comply with applicable data protection laws governing international transfers of personal information have been satisfied in full.

Rule 12 – Sensitive Personal Information and/or Criminal Personal Information:

We will only process sensitive personal information and/or criminal personal information

Intel will assess whether sensitive personal information is required for the intended purpose of processing before collecting it.

In principle, we will obtain the individual's explicit consent to collect and process his or her sensitive personal information, unless we are required to do so by applicable

collected where we have obtained the individual's explicit consent, unless there is an alternative legitimate basis for processing consistent with applicable law.

law or have another legitimate basis for doing so consistent with the applicable data protection laws of the country in which the personal information was collected.

Processing of criminal personal information shall only be carried out under the control of official authority or where authorised by applicable data protection laws providing for appropriate safeguards for the rights and freedoms of individuals.

When obtaining an individual's consent, that consent will be given freely, and will be specific, informed and unambiguous.

Rule 13 – Direct marketing:

We will allow customers to opt-out of receiving marketing information.

All individuals have the right to object, in an easy-to-exercise manner and free of charge, to the use of their personal information for direct marketing purposes and we will honour all such opt-out requests.

Rule 14 – Automated individual decision-making, including profiling:

We will respect individuals' rights not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects or similarly significantly affects them.

We will not make any decision, which produces legal effects concerning an individual or that similarly significantly affects him or her, based solely on the automated processing of that individual's personal information, including profiling, unless such decision is:

- necessary for entering into, or performing, a contract between a group member and that individual;
 - authorized by applicable data protection laws; or
 - based on the individual's explicit consent.
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In the first and third cases above, we will implement suitable measures to protect the individual's rights and freedoms and legitimate interests, including the right to obtain human intervention, to express his or her view and to contest the decision.

We will never make automated individual decisions about individuals using their sensitive personal information unless they have given explicit consent under Rule 12 or another lawful basis applies.

Part III: Delivering compliance in practice

So that we follow the rules set out in this Controller Policy, in particular the obligations set out in Part II, Intel and all of its group members will also comply with the following practical commitments:

1. Resourcing and compliance: The Intel Privacy Office is responsible for overseeing and enabling compliance with this Controller Policy on a day-to-day basis.

We will have appropriate resourcing and support to ensure and oversee privacy compliance throughout the business. A summary of the roles and responsibilities of Intel's privacy team is set out in [Appendix 4](#) (Privacy Compliance Structure).

2. Privacy training: Group members will provide appropriate privacy training to workers who:

We will ensure workers are educated about the need to protect personal information in accordance with this Controller Policy

- have regular access to personal information; or
- are involved in the processing of personal information or in the development of products, services and/or tools that process personal information.

We will provide such training in accordance with the Privacy Training Program (see [Appendix 5](#)).

3. Records of Data Processing: We will maintain a record of the processing activities that we conduct in accordance with applicable data protection laws. These records should be kept in writing (which may be in electronic form) and we will make these records available to competent data protection authorities upon request.

The Intel Privacy Office is responsible for ensuring that such records are maintained.

4. Audit:

We will carry out data protection audits on regular basis.

We will carry out data protection audits on a regular basis, which may be conducted by either internal or external accredited auditors. In addition, we will conduct data protection audits on specific request from the Ethics and Compliance Oversight Committee or Internal Audit or the European Data Protection Officer, the Intel Privacy Office or any internal legal advisors.

We will conduct any such audits in accordance with the Audit Protocol (see [Appendix 6](#)).

5. Data Protection Impact Assessments

We will carry out data protection impact assessments where processing is likely to result in a high risk to rights and freedoms of individuals, and consult with competent data protection authorities where required by applicable law.

Where required by applicable data protection laws, we will carry out data protection impact assessments (DPIA) whenever the processing of personal information, particularly using new technologies, is likely to result in a high risk to the rights and freedoms of individuals. Intel will carry out a DPIA prior to processing which will contain at least the following:

- A systematic **description** of the envisaged processing operations and the purposes of the processing;
 - An assessment of the **necessity and proportionality** of the processing operations in relation to the purposes;
 - An assessment of the **risks** to the privacy rights of individuals;
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- The **measures envisaged** to address the risks, including safeguards, security measures and mechanisms to ensure the protection of personal information and demonstrate compliance with applicable data protection laws.

Where the DPIA indicates that the processing would still result in a high risk to individuals, Intel will consult with local data protection authorities where required by applicable data protection laws.

6. Privacy by design and by default

We will apply privacy by design and by default principles when designing and implementing new products and systems.

When designing and implementing new products and systems which process personal information, we will apply data protection by design and by default principles. This means we will implement appropriate technical and organisational measures that:

- are designed to implement the data protection principles in an effective manner and to integrate the necessary safeguards in order to protect the rights of individuals and meet the requirements of applicable data protection laws ("**privacy by design**"); and
 - ensure that, by default, only personal information which are necessary for each specific processing purpose are collected, stored, processed and are accessible; in particular, that by default personal information is not made accessible to an indefinite number of people without the individual's intervention ("**privacy by default**").
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7. Complaint handling: Group members will enable individuals to raise data protection complaints and concerns (including complaints about processing under this Controller Policy) by complying with the Complaint Handling Procedure (see [Appendix 7](#)).

We will enable individuals to raise data protection complaints and concerns.

8. Cooperation with competent data protection authorities: Group members will cooperate with competent data protection authorities by complying with the Cooperation Procedure (see [Appendix 8](#)).

We will always cooperate with competent data protection authorities.

9. Updates to this Controller Policy: Whenever updating our Controller Policy, we will comply with the Updating Procedure (see [Appendix 9](#)).

We will update this Controller Policy in accordance with our Updating Procedure

10. Conflicts between this Controller Policy and national legislation: If local laws applicable to any group member prevent it from fulfilling its obligations under the Controller Policy or otherwise have a substantial effect on its ability to comply with the Controller Policy, the group member will promptly inform the Intel Ireland Limited and the Intel Privacy Office unless prohibited by a law enforcement authority.

We will take care where local laws conflict with this Policy, and act responsibly to ensure a high standard of protection for the personal information in such circumstances.

The Intel Privacy Office, in consultation with Intel Ireland Limited, will make a responsible decision on the action to

take and will, where appropriate, consult with the competent data protection authority.

11. Government requests for disclosure of personal information:

We will notify the competent supervisory authorities in case of a legally binding request for disclosure of personal information.

If a group member receives a legally binding request for disclosure of personal information by a law enforcement authority or state security body which is subject to this Controller Policy, it will comply with the Government Data Request Response Procedure set out in Appendix 10.

Part IV: Third Party Beneficiary Rights

Application of this Part IV

This Part IV applies where individuals' personal information are protected under European data protection laws (including the General Data Protection Regulation). This is the case when:

- those individuals' personal information are processed in the context of the activities of a group member (or its third party processor) established in Europe;
- a non-European group member (or its third-party processor) offers goods and services (including free goods and services) to those individuals in Europe; or
- a non-European group member (or its third-party processor) monitors the behaviour of those individuals, as far as their behaviour takes place in Europe;

and that group member then transfers those individuals' personal information to a non-European group member for processing under the Controller Policy.

Entitlement to effective remedies

When this Part IV applies, individuals have the right to pursue effective remedies in the event their personal information is processed by Intel in breach of the following provisions of this Controller Policy:

- Part II (Our Obligations) of this Controller Policy;
- Paragraphs 7 (Complaints Handling), 8 (Cooperation with Competent Data Protection Authorities), 10 (Conflicts between this Controller Policy and national legislation) and 11 (Government requests for disclosure of personal information) under Part III of this Controller Policy; and
- Part IV (Third Party Beneficiary Rights) of this Controller Policy.

Individuals' third party beneficiary rights

When this Part IV applies, individuals may exercise the following rights:

- *Complaints*: Individuals may complain to a group member and/or to a European data protection authority, in accordance with the Complaints Handling Procedure at [Appendix 7](#);
- *Proceedings*: Individuals may commence proceedings against a group member for violations of this Controller Policy, in accordance the Complaints Handling Procedure at [Appendix 7](#);
- *Compensation*: Individuals who have suffered material or non-material damage as a result of an infringement of this Controller Policy have the right to receive compensation from Intel for the damage suffered.
- *Transparency*: Individuals also have the right to obtain a copy of the Controller Policy via: <https://www.intel.com/content/www/us/en/privacy/eea-binding-corporate-rules.html>

Responsibility for breaches by non-European group members

When this Part IV applies, Intel Ireland Limited will be responsible for ensuring that any action necessary is taken to remedy any breach of this Controller Policy by a non-European group member.

In particular:

- If an individual can demonstrate damage it has suffered likely occurred because of a breach of this Controller Policy by a non-European group member, Intel Ireland Limited will have the burden of proof to show that the non-European group member is not responsible for the breach, or that no such breach took place.
- where a non-European group Member fails to comply with this Controller Policy, individuals may exercise their rights and remedies above against Intel Ireland Limited and, where appropriate, receive compensation (as determined by a competent court

or other competent authority) from Intel Ireland Limited for any material or non-material damage suffered as a result of a breach of this Controller Policy;

Shared liability for breaches with processors

When this Part IV applies, then where Intel has engaged a third-party processor to conduct processing on its behalf, and both are responsible for harm caused to an individual by processing in breach of this Controller Policy, Intel accepts that both Intel and the processor may be held liable for the entire damage in order to ensure effective compensation of the individual.

Part V: Appendices

APPENDIX 1

INTEL GROUP MEMBERS

EEA Entities

Name of entity	Registered address	Registration Number
Austria		
Intel Austria GmbH (LE:543)	Europastraße 8, Building T02, 9524 Villach, Austria	FN 351052 d
Belgium		
Intel Corporation NV/SA (LE:300)	Kings Square, Veldkant 31, 2550 Kontich, Belgium	0415.497.718
Czech Republic		
Intel Czech Tradings Inc (Czech branch) (LE:470)	I.Pavlova 1789/5, 120 00 Prague 2 Czech Republic	60165898
Denmark		
Intel Mobile Communications Denmark ApS (LE:306)	Hørkær 12A, 2730 Herlev, Denmark	CVR No. 33163150
Finland		
Intel Finland OY (LE:350)	Westendinkatu 7, Espoo, 02160, Finland	0357606-4
France		
Intel Corporation SAS (LE:330)	Les Montalets, 2, rue de Paris, 92196, Meudon Cedex, France	302 456 199

Germany		
Intel Deutschland GmbH (LE:356)	Am Campeon 10-12, 85579, Neubiberg, Germany	HRB 186928
Intel Germany Services GmbH (LE:346)	Am Campeon 10, 85579, Neubiberg, Germany.	HRB 262579
Intel Germany GmbH & Co. KG (LE:342)	Lilienthalstrabe 15, D-85579, Neubiberg, Germany	HRA 94167
Ireland		
Intel Research and Development Ireland Limited (LE:508)	Collinstown Industrial Park, Leixlip, Co. Kildare, Ireland	308263
Intel Ireland Limited (branch) (LE:500)	Collinstown Industrial Park, Leixlip, Co. Kildare, Ireland	E902934
Italy		
Intel Corporation Italia S.p.A. (LE:360)	Milanofiori Palazzo E/4, 20090, Assago (Milano), Italy	04236760155
Lithuania		
Intel Vilnius UAB (LE:366)	J.Jasinskio 16B, LT-03163 Vilnius, Lithuania	UI 2000-105. Co. ID No. 11169
Netherlands		
Intel Benelux B.V. (LE:390)	High Tech Campus 83, 5656AG, Eindhoven, Netherlands	24134020
Intel International B.V. (LE:540)	Capronilaan 37, 1119 NG, Schiphol-Rijk, Netherlands	34098535
Intel Finance BV (LE:398)	Capronilaan 37, 1119 NG, Schiphol-Rijk, Netherlands	57978972
Intel International Finance BV	Capronilaan 37, 1119 NG, Schiphol-Rijk, Netherlands	18037530

(LE:976)		
Poland		
Intel Technology Poland Sp. z o.o. (LE:466)	ul. Slowackiego 173, 80-298, Gdansk, Poland	KRS 101882
Portugal		
Turbe - Distribucao e Marketing de Produtos Electronicos, Sociedade Unipessoal, Lda. (LE:370)	Rua Castilho, 44, 8th floor, 1250-071 Lisbon, Portugal	505 456 036
Romania		
Intel Software Development S.R.L. (LE:474)	2A Piața Consiliul Europei, United Business Center 1, 7th floor unit U1E7 and 8th floor, Timișoara, Timiș county, Romania	J35/340/2017 CUI 27555127
Spain		
Intel Corporation Iberia S.A. (LE:320)	Edificio Torre Picasso, Pl. Pablo Ruiz Picasso, 1 - Floor 25th, 28020, Madrid, Spain	CIF A-28819381
Sweden		
Intel Sweden A.B. (LE:400)	Isafjordsgatan 30B, 16440 Kista, Sweden	556189-6027

Non-EEA Entities

Name of entity	Registered address	Registration number
Algeria		
Intel Corporation (UK) Ltd. (Algeria Liaison Office) (LE:329)	Algerian Business Center, 11th Floor, Pins Maritime, El Mohammadia, Algiers, Algeria	15-05/R of April 19, 2021
Argentina		
Intel Software de Argentina S.A. (LE:221)	Juan Díaz de Solís 1330, 5th floor, Vicente López, Province of Buenos Aires, Buenos Aires, Argentina	30-70944960-1
Australia		
Intel Australia Pty. Ltd. (LE:932)	Level 61, Governor Phillip Tower, 1 Farrer Place, Sydney NSW 2000, Australia	001 798 214
Brazil		
Intel Semicondutores do Brasil Ltda. (LE:220)	Av. Dr. Chucri Zaidan, 940, 9o, 10o, e 11o andares, Vila Cordeiro, Sao Paulo, 04583-904, Brazil	142882
Canada		
Intel Technology of Canada (LE:200)	Suite 1700, Park Place, 666 Burrard Street, Vancouver BC V6C 2X8, Canada	C1312651
Caymen Islands		
Intel Ireland Limited (LE:505)	Whitehall House, 238 North Church Street, PO Box 1043, Georgetown Grand Cayman, KY1-1102, Cayman Islands	32967
Chile		
Intel Tecnologia El Chile S.A. (LE:229)	Av. Providencia 1760, 19th Floor, Providencia, Santiago, Chile	Fojas 20763 N° 16606 Year 2000
China		

Intel Asia-Pacific Research & Development Ltd. (LE:764)	No. 880 Zi Xing Road, Zizhu Science Park, Shanghai, 201109, China	913100007659516415
Intel China Ltd. (LE:776)	2/F, No. 751 Zi Ri Road, Zizhu Science Park, Shanghai, 200241, China	310000400073046
Intel China Research Center Ltd. (LE:725)	8F, Raycom Infotech Park A, No.2, Kexueyuan South Road,, Beijing, Haidian District, 100190, China	91110108761401095K
Intel Mobile Communications Technology (Shanghai) Ltd. (LE:891)	Building 5, Phase IV Incubation Building, No. 14-16, Lane 647, Song Tao Road, Zhangjiang Hi-Tech Park, Pudong, Shanghai, China	310115400265398
Intel Mobile Communications Technology (Xi'an) Ltd. (LE:884)	Room 607, Floor 6, Building A, Xi'an Ascendas Innovation Hub, No.38, 6th Gaoxin Road, High-Tech Zone, Xi'an, Shaanxi Province, 710075, China	610100400008110
Intel Products (Chengdu) Ltd. (LE:778)	No. 8-1, Kexin Road, Chengdu High-Tech Zone, Chengdu, Sichuan, 611731, China	91510100752809830T
Intel Semiconductor (Dalian) Ltd. (LE:724)	No. 109 Huaihe Road East, Dalian Economic and Technology Development Area, Dalian, Liao Ning Province, 116600, China	91210200787321704D
Intel Trading (Shanghai) Co., Ltd. (LE:888)	Room 317, 3th Floor, No. 2 Middle Tainan Road, Waigaoqiao Free Trade Zone, Pudong, Shanghai, 200131, China	913100006073880990
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Intel Tecnologia de Colombia S.A. (LE:224)	Cra. 7 No. 71-21 Torre B Of. 603, Bogota, Cundinamarca, Colombia	830034293
Costa Rica		
Componentes Intel de Costa Rica, S.A. (LE:230)	S.A. Avenida Escazú, Torre Lexus, 4to piso. Escazú, San Jose, Costa Rica, Costa Rica	3-101-186874

Intel Free Trade Zone Park, S.A. (LE:233)	Bufete Facio & Canas, Forum 2 Business Center, Pacheco Coto Building 4th Floor, Costa Rica	3-101-385965
Manufactura Ensamble & Pruebas EMP Intel de Costa Rica Sociedad de Responsabilidad Limitada (LE:247)	Calle 129, Province Heredia, Belen, San Antonio, Zona Franca Belen, Costa Rica	4062001213633
Egypt		
Intel Corporation Egypt LLC (LE:665)	Office No 444, Administrative Building No 47, Fourth Floor, Al Tassein North Street, Fifth Settlement, New Cairo, Egypt	20390
Hong Kong		
Intel Asia Holding Limited (LE:761)	69/F, Central Plaza, 18 Harbour Road, Wanchai, Hong Kong	856307
Intel Semiconductor (US) LLC (Hong Kong branch) (LE:760A)	69/F, Central Plaza, 18 Harbour Road, Wanchai, Hong Kong	F8920
India		
Intel Technology India Private Limited (LE:831)	23-56P, Deverabeesanahalli, Varthur Hobli, Outer Ring Road, Bangalore, Karnataka, 560 103, India	08/21606
Intel Solutions & Services India Private Limited (LE:834)	23-56P, Deverabeesanahalli, Varthur Hobli, Outer Ring Road, Bangalore, Karnataka, 560 103, India	U32105KA2002PTC030832
Indonesia		
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Intel Israel Limited (LE:620)	Andrei Saharov 9 , Haifa, 3508409 , Israel	PC 51-068286-7
Intel Mobile Communications Israel Ltd. (LE:625)	94 Em Hamoshavot Rd, Petach-Tikva, Israel	P.C. 51-291090-2
Intel Semi Conductors Ltd. (LE:640)	P.O. Box 498, Haifa, 31000, Israel	PC-51-078931-6
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Intel Products (M) Sdn. Bhd. (LE:745)	1st Floor, 2 LebuH Pantai, 10300 George Town, Penang, Malaysia	199501036533 (365735-X)
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Nigeria		
Intel Semi Conductor West Africa Limited (LE:538)	39 Alfred Remane Rd, 3rd Fl Mulliner Towers, Suite 312, Ikoyi, Lagos, Nigeria	RC635733
Peru		
Intel Semiconductores del Peru S.A. (LE:227)	Av. Jose Larco Nro., 1301 Int., Lima, P-20, Peru	11654757
Philippines		
Intel Microelectronics (Phils.) Inc. (LE:880)	Unit 702, 7th floor, Net3 Cube, 3rd Ave Corner, 30th St., E-Square Crescent Park West, Bonifacio Global City, Metro Manila, 1634, Philippines	A1996-07366
Republic of Korea		
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AO Intel A/O (LE:450)	17, Krylatskaya str., Bldg. 4, 121614, Moscow, Russian Federation	1027700021470
Intel Technologies LLC (LE:431)	17, Krylatskaya str., Bldg. 4, 121614, Moscow, Russian Federation	1127746104540
Saudi Arabia		
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Singapore		

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South Africa		
Intel South Africa Corp. (Branch) (LE:530)	Office No 263-264-265 Design Quarte, Leslie Road, Fourways, Johannesburg, Gauteng, 2191, South Africa	1995/007853/10
Switzerland		
Intel Semiconductor AG (LE:310)	c/o Centralis Switzerland GmbH, Dufourstrasse 101, 8008, Zurich, Switzerland	020.30.913.786-7
Taiwan		
Intel Innovation Technologies Limited (LE:796)	20/F, No.369, Sec 7, Zhong Xiao East Road, NanGang District, Taipei, Taiwan	80510407
Intel Microelectronics Asia LLC, Taiwan Branch (LE:791)	20/F, No.369, Sec 7, Zhong Xiao East Road, NanGang District, Taipei, Taiwan	16432460
Thailand		
Intel Microelectronics (Thailand) Limited (LE:860)	No. 87, M Thai Tower, All Seasons Place, 23rd Floor, Room 2316, 2318, 2320, Wireless Road, Kwaeng Lumpini, Khet Pathumwan, Bangkok, 10330, Thailand	907/2539
Turkey		
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United Arab Emirates		
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United States		
Intel Americas, Inc. (LE:150)	1209 Orange Street, Wilmington DE 19801, United States	FEIN: 77-0521945; DE# 3077423
Intel Corporation (LE:100)	1209 Orange Street, Wilmington DE 19801, United States	2189074
Intel Massachusetts, Inc. (LE:113)	1209 Orange Street, Wilmington DE 19801, United States	2822259
Intel Resale Corporation (LE:158)	818 West 7th Street, Ste. 930, Los Angeles CA 90017, United States	1194886
Intel Federal LLC (LE:199)	1209 Orange Street, Wilmington DE 19801, United States	4339297
Intel Semiconductor (US) LLC (LE:760)	1209 Orange Street, Wilmington DE 19801, United States	EIN 77-0477939
Vietnam		
Intel Products Vietnam Co., Ltd. (LE:763)	Lot I2, D1 Street, Hi-tech Park, Tan Phu Ward, Thu Duc City, Ho Chi Minh City, Vietnam	0304295429
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APPENDIX 2

FAIR INFORMATION DISCLOSURES

1. Background

- 1.1 Intel's "Corporate Privacy Rules: Controller Policy", the "**Controller Policy**" provide a framework for the transfer of personal information between Intel group members.
- 1.2 This Fair Information Disclosure document sets out the transparency information that Intel must provide to individuals when processing their personal information.

2. Information to be provided where Intel collects personal information directly from individuals

- 2.1 When Intel collects personal information directly from individuals, it must provide the following transparency information:
 - (a) the **identity and contact details** of the data controller and, where applicable, of its representative;
 - (b) the contact details of the **European Data Protection Officer**, where applicable;
 - (c) the **purposes** of the processing for which the personal information are intended as well as the **legal basis** for the processing;
 - (d) where the processing is based on Intel's or a third party's legitimate interests, the **legitimate interests** pursued by Intel or by the third party;
 - (e) the **recipients or categories of recipients** of the personal information, if any;
 - (f) where applicable, the fact that a group member in Europe intends to **transfer** personal information to a third country or international organisation outside of Europe, and the measures that the group member will take to ensure the personal information remains protected in accordance with applicable data protection laws and how to obtain a copy of such measures.
- 2.2 In addition to the information above, Intel shall also provide individuals with the following further information necessary to ensure fair and transparent processing, at the time of collection:
 - (a) the **period** for which the personal information will be stored, or if that is not possible, the criteria used to determine that period;

- (b) information about the **individuals' rights** to request access to, rectify or erase their personal information, as well as the right to restrict or object to the processing, and the right to data portability;
- (c) where the processing is based on consent, the existence of the right to **withdraw consent** at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- (d) the right to **lodge a complaint** with the competent supervisory authority;
- (e) whether the provision of personal information is a **statutory or contractual** requirement, or a requirement necessary to enter into a contract, as well as whether the individual is obliged to provide the personal information and of the possible consequences of failure to provide such information;
- (f) the existence of **automated decision-making**, including profiling, and, where such decisions may have a legal effect or significantly affect the individuals whose personal information are collected, any meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for those individuals.

2.3 The transparency information described in this paragraph must be provided at the time that Intel obtains the personal information from the individual.

3. Information to be provided where Intel collects personal information about individuals from a third party source

3.1 When Intel collects personal information from a third party source (that is, someone other than the individual themselves), it must provide the following information:

- (a) the information described in paragraphs 2.1 and 2.2 above;
- (b) the categories of **personal information** that are being processed; and
- (c) **details of the third party source** from which Intel obtained the personal information including, if applicable, identifying whether the personal information came from publicly accessible sources.

3.2 The information described in this paragraph must be provided within a reasonable period after Intel obtains the personal information and, at the latest, within one month, having regard to the specific circumstances in which the personal information are processed. In addition:

- (a) if the personal information are to be used for communication with the individual, the information described in this paragraph must be provided at the latest at the time of the first communication to that individual; and
- (b) if a disclosure of the personal information to another recipient is envisaged, the information described in this paragraph must be provided at the latest when the personal information are first disclosed; in other words, the individual data subject must be informed at or before the time when the individual's personal information is disclosed to third parties.

4. Derogations from providing transparency disclosures

4.1 The requirements to provide information as described in this Fair Information Disclosures document shall not apply where and insofar as:

- (a) the individual already has the information;
- (b) the provision of such information proves impossible or would involve a disproportionate effort, and Intel takes appropriate measures, consistent with the requirements of European Union privacy laws, to protect the individual's rights and freedoms and legitimate interests, including by making the information publicly available;
- (c) obtaining or disclosure is expressly laid down by applicable laws to which Intel is subject and these laws provide appropriate measures to protect the individual's legitimate interests; or
- (d) the personal information must remain confidential subject to an obligation of professional secrecy regulated by applicable laws to which Intel is subject, including a statutory obligation of secrecy.

APPENDIX 3

DATA PROTECTION RIGHTS PROCEDURE

1. Background

- 1.1 Intel's "Corporate Privacy Rules: Controller Policy" (the "**Controller Policy**") safeguard personal information transferred between the Intel group members.
- 1.2 Individuals whose personal information are processed by Intel under the Controller Policy have certain data protection rights, which they may exercise by making a request to the controller of their information (a "**Data Protection Rights Request**").
- 1.3 This Intel Corporate Privacy Rules: Data Protection Rights Procedure ("**Procedure**") describes how Intel will respond to any Data Protection Rights Requests it receives from individuals whose personal information are processed and transferred under the Controller Policy.

2. Individual's data protection rights

- 2.1.1 Intel will enable individuals to exercise the following data protection rights, consistent with the requirements of applicable data protection laws:
 - (a) **The right of access:** This is the right for individuals to obtain confirmation whether a controller processes personal information about them and, if so, to be provided with details of that personal information and access to it. The process for handling this type of request is described further in paragraph 4 below;
 - (b) **The right to rectification:** This is the right for individuals to require a controller to rectify without undue delay any inaccurate personal information a controller may be processing about them. The process for handling this type of request is described further in paragraph 5 below.
 - (c) **The right to erasure:** This is the right for individuals to require a controller to erase personal information about them on certain grounds – for example, where the personal information is no longer necessary to fulfil the purposes for which it was collected. The process for handling this type of request is described further in paragraph 5 below.
 - (d) **The right to restriction:** This is the right for individuals to require a controller to restrict processing of personal information about them on certain grounds. The process for handling this type of request is described further in paragraph 5 below.

- (e) **The right to object:** This is the right for individuals to object, on grounds relating to their particular situation, to a controller's processing of personal information about them, if certain grounds apply. The process for handling this type of request is described further in paragraph 5 below.
- (f) **The right to data portability:** This is the right for individuals to receive personal information concerning them from a controller in a structured, commonly used and machine-readable format and to transmit that information to another controller, if certain grounds apply. The process for handling this type of request is described further in paragraph 6 below.

3. Responsibility to respond to a Data Protection Rights Request

3.1 Overview

3.1.1 The controller of an individual's personal information is primarily responsible for responding to a Data Protection Rights Request and for enabling the individual concerned to exercise his or her rights under applicable data protection laws.

3.1.2 As such, when an individual contacts Intel to make any Data Protection Rights Request then where Intel is the controller of that individual's personal information under the Controller Policy, it must enable the individual to exercise their data protection rights directly in accordance with this Procedure.

3.2 Assessing responsibility to respond to a Data Protection Rights Request

3.2.1 If a group member receives a Data Protection Rights Request from an individual, it must pass the request to the Intel Privacy Office at privacy.feedback@intel.com immediately upon receipt indicating the date on which it was received together with any other information which may assist the Intel Privacy team to deal with the request.

3.2.2 The Intel Privacy Office will make an initial assessment of the request as follows:

- (a) the Intel Privacy Office will determine whether Intel is a controller of the personal information that is the subject of the request;
- (b) where Intel Privacy Office determines that Intel is a controller of the personal information, it will then determine whether the request has been made validly under applicable data protection laws (in accordance with section 3.3 below), whether an exemption applies (in accordance with section 3.4 below) and respond to the Request (in accordance with section 3.5 below).

3.3 Assessing the validity of a Data Protection Rights Request

- (a) If Intel Privacy Office determines that Intel is the controller of the personal information that is the subject of the request, it will contact the individual promptly, and no later than within five (5) working days, in writing (including by email) to confirm receipt of the Data Protection Rights Request.
- (b) A Data Protection Rights Request may be made in writing, which can include email, or Intel's online request form or orally. A Data Protection Rights Request does not have to be official or mention data protection law to qualify as a valid request.
- (c) Intel will take reasonable steps to verify the identity of the individual making a request, and may request such additional information as is necessary for this purpose. Intel may also request further information which is necessary to action the individual's request.

3.4 *Exemptions to a Data Protection Rights Request*

- (a) Intel will not refuse to act on Data Protection Rights Request unless it can demonstrate that an exemption applies under applicable data protection laws.
- (b) Intel may be exempt under applicable data protection laws from fulfilling the Data Protection Rights Request if it can demonstrate that the individual has made a manifestly unfounded or excessive request (in particular, because of the repetitive character of the request).
- (c) If Intel decides not to take action on the Data Protection Rights Request, Intel will inform the individual without delay and at the latest within one (1) month of receipt of the request of:
(i) the reasons for not taking action: and (ii) the right to lodge a claim before the court and a complaint before the competent supervisory authority..

3.5 *Responding to a Data Protection Rights Request*

- (a) Where Intel is the controller of the personal information that is the subject of the Data Protection Rights Request, and Intel has already confirmed the identity of the requestor and has sufficient information to enable it to fulfil the request (and no exemption applies under applicable data protection laws), then Intel shall deal with the Data Protection Rights Request in accordance with paragraph 4, 5 or 6 below (as appropriate).
- (b) Intel will respond to a Data Protection Rights Request without undue delay and in no case later than one (1) month of receipt of that request. This one (1) month period may be extended by two (2) further months where necessary, if the request is complex or due to the number of requests that have been made.

4. Requests for access to personal information

4.1 Overview

4.1.1 An individual may require a controller to provide the following information concerning processing of his or her personal information:

- (a) confirmation as to whether the controller holds and is processing personal information about that individual;
- (b) if so, a description of the purposes of the processing, the categories of personal information concerned, the recipients or categories of recipients to whom the information is, or may be, disclosed, the envisaged period(s) (or the criteria used for determining those period(s)) for which the personal information will be stored;
- (c) information about the individual's right to request rectification or erasure of his or her personal information or to restrict or object to its processing;
- (d) information about the individual's right to lodge a complaint with a competent data protection authority;
- (e) information about the source of the personal information, if it was not collected from the individual;
- (f) details about whether the personal information is subject to automated decision-making (including automated decision-making based on profiling); and
- (g) where personal information is transferred outside Europe, the appropriate safeguards that Intel has put in place relating to such transfers in accordance with applicable data protection laws.

4.1.2 An individual is also entitled to request a copy of his or her personal information from the controller. Where an individual makes such a request, the controller must provide that personal information to which the individual is entitled, to the individual in an intelligible form.

4.2 Process for responding to access requests from individuals

4.2.1 If Intel receives an access request from an individual, this must be passed to the Intel Privacy Office at privacy.feedback@intel.com immediately to make an initial assessment of responsibility consistent with the requirements of paragraph 3.2 above.

4.2.2 Where Intel determines it is the controller of the personal information and responsible for responding to the individual directly (and that no exemption to the right of access applies under applicable data protection laws), Intel Privacy Office will arrange a search of the relevant electronic and paper filing systems.

4.2.3 The Intel Privacy Office may refer any complex cases to the European Data Protection Officer for advice, particularly where the request concerns information relating to third parties or where the release of personal information may prejudice commercial confidentiality or legal proceedings.

4.2.4 The personal information that must be disclosed to the individual will be collated by the Intel Privacy Office into a readily understandable format. A covering letter will be prepared by the Intel Privacy Office which includes all information required to be provided in response to an individual's access request (including the information described in paragraph 4.1.1).

4.3 *Exemptions to the right of access*

4.3.1 A valid request may be refused on the following grounds:

- (a) if the refusal to provide the information is consistent with applicable data protection law (for example, where a European group member transfers personal information under the Controller Policy, if the refusal to provide the information is consistent with the applicable data protection law in the European Member State where the group member is located);
- (b) where the personal information is held by Intel in non-automated form that is not or will not become part of a filing system; or
- (c) the personal information does not originate from Europe, has not been processed by any European group member, and the provision of the personal information requires Intel to use disproportionate effort.

4.3.2 The Intel Privacy Office will assess each request individually to determine whether any of the above-mentioned exemptions applies. A group member must never apply an exemption unless this has been discussed and agreed with the Intel Privacy Office.

5. **Requests to correct, update or erase personal information, or to restrict or cease processing personal information**

5.1 If Intel receives a request to correct, update or erase personal information, or to restrict or cease processing of an individual's personal information, this must be passed to the Intel Privacy Office at privacy.feedback@intel.com immediately to make an initial assessment of responsibility consistent with the requirements of paragraph 3.2 above.

5.2 Once an initial assessment of responsibility has been made then where Intel is the controller of that personal information, the request must be notified to the Intel Privacy Office promptly for it to consider and deal with as appropriate in accordance with applicable data protection laws.

5.3 When Intel must rectify or erase personal information, Intel will notify other group members and any processor to whom the personal information has been disclosed so that they can also update their records accordingly.

5.4 If Intel acting as controller has made the personal information public, and is obliged to erase the personal information pursuant to a Data Protection Rights Request, it must take reasonable steps, including technical measures (taking account of available technology and the cost of implementation), to inform controllers which are processing the personal information that the individual has requested the erasure by such controllers of any links to, or copy or replication of, the personal information.

6. Requests for data portability

6.1 If an individual makes a Data Protection Rights Request to Intel acting as controller to receive the personal information that he or she has provided to Intel in a structured, commonly used and machine-readable format and/or to transmit directly such information to another controller (where technically feasible), Intel's Privacy Office will consider and deal with the request appropriately, and in accordance with applicable data protection laws insofar as the processing is based on that individual's consent or on the performance of, or steps taken at the request of the individual prior to entry into, a contract.

7. Questions about this Data Protection Rights Procedure

7.1 All queries relating to this Procedure are to be addressed to the Intel Privacy Office or at privacy.feedback@intel.com.

APPENDIX 4

PRIVACY COMPLIANCE STRUCTURE

1. Background

1.1 Intel's compliance with global data protection laws and the "Corporate Privacy Rules: Controller Policy" (the "**Controller Policy**") is overseen and managed throughout all levels of the business by a global, multi-layered, cross-functional Privacy Compliance Structure.

1.2 Intel's Privacy Compliance Structure has the full support of Intel's executive management. Further information about Intel's Privacy Compliance Structure is set out below.

2. The Privacy Office

2.1 Intel has established a Privacy Office which is comprised of three primary groups: operations, legal and policy teams (privacy dedicated). The Privacy Office is supported by the Data Protection Officer of Intel Ireland Limited, who the Intel group also refers to as "European Data Protection Officer," due to the prominent role of Intel Ireland Limited as the main establishment of the Intel group in the EU for purposes of personal data processing and compliance with European data protection laws. The Privacy Office is also supported by data protection officers in other European group members (e.g. Intel Deutschland GmbH) and a network of privacy champions. This group works together to provide appropriate independence and oversight of duties relating to all aspects of Intel's data protection compliance.

2.2 The Privacy Office is accountable for managing and implementing Intel's data privacy program internally (including the Policies) and for establishing effective data privacy controls. In this way, the Privacy Office is actively engaged in addressing matters relating to Intel's privacy compliance on a routine, day-to-day basis. The leadership team of the Privacy Office report out as follows:

- (a) To the Ethics and Compliance Oversight Committee, annually;
- (b) To the Data Policy Management Review Committee, twice annually;
- (c) To the Compliance and Ethics Program committee, annually; and
- (d) To the legal leadership team as part of the quarterly operations reviews.

Separately, the Data Protection Officer of Intel Ireland Limited directly reports to the highest management level of Intel Ireland Limited. Equally, the Data Protection Officer of Intel Deutschland GmbH directly reports to the highest management level of Intel Deutschland GmbH.

2.3 The Privacy Office's key responsibilities include:

- Defining and communication the Policies and other privacy related policies, objectives and standards are defined and communicated.
- Evaluating, approving and prioritizing remedial actions consistent with the requirements of the Policies, strategic plans, business objectives and regulatory requirements.
- Periodically assessing privacy initiatives, accomplishments, and resources to ensure continued effectiveness and improvement.
- Ensuring that Intel's business objectives align with the Policies and related privacy and information protection strategies, policies and practices.
- Dealing with any escalated privacy complaints in accordance with the Binding Corporate Rules: Complaint Handling Procedure (Appendix 7).
- Supporting the conduct of any data protection audits carried out by data protection authorities, in accordance with the Intel's Corporate Privacy Rules: Cooperation Procedure (Appendix 8).
- Providing guidance about the collection and use of personal information subject to the Policies and to assess the processing of personal information by Intel group members for potential privacy-related risks.
- Responding to inquiries and compliance queries relating to the Policies from workers, customers and other third parties raised through its dedicated e-mail address at privacy.feedback@intel.com.
- Helping to implement the related policies and practices at a functional and local country level, providing guidance and responding to privacy questions and issues.
- Providing input on audits of the Controller Policy, coordinating responses to audit findings and responding to inquiries of the data protection authorities.
- Monitoring changes to global privacy laws and ensuring that appropriate changes are made to the Controller Policy and Intel's related policies and business practices.
- Overseeing training for workers on the Controller Policy and on data protection legal requirements in accordance with Intel's Corporate Privacy Rules: Privacy Training Program (Appendix 5).
- Promoting the Controller Policy and privacy awareness across business units and functional areas through privacy communications and initiatives.
- Evaluating privacy processes and procedures to ensure that they are sustainable and effective.

- Ensuring that the commitments made by Intel in relation to updating and communicating updates to the Controller Policy are met in accordance with the Intel Corporate Privacy Rules: Updating Procedure (Appendix 9).
- Overseeing compliance with the Intel's Corporate Privacy Rules: Data Protection Rights Procedure (Appendix 3) and the handling of any requests made under it.

3. Privacy Champions

- 3.1 Intel has a number of privacy champions that are business unit, legal or geographic representatives who acts as advocates to foster privacy as a core value, raise awareness, and drive privacy compliance within their respective business unit or geography.
- 3.2 Privacy champions are given defined responsibilities that are additional to their day job, as well as appropriate training to support these aims. In some business units, such as HR, there is a team of privacy champions rather than an individual representative.

4. Privacy Council

- 4.1 Intel has also established a Privacy Council, which is made up of the Intel Privacy Office, the Privacy Champions, and some of the business unit lawyers.
- 4.2 The Privacy Council is a key component of Intel's privacy compliance program and is a collaborative partnership between all of those involved in privacy at Intel, with the goal of supporting operational privacy compliance throughout the company. For example, the Council serves as a communications interface with the business, flows down privacy training and related privacy information from the Privacy Office, and assists the business in the completion of data protection impact assessments.

5. Intel Workers

- 5.1 All workers within Intel are responsible for supporting the Privacy Office on a day-to-day basis and adhering to Intel privacy policies.
- 5.2 In addition, Intel personnel are responsible for escalating and communicating any potential violation of the privacy policies to the Intel Privacy Office. On receipt of a notification of a potential violation of the privacy policy the issue will be investigated to determine if an actual violation occurred. Results of such investigations will be documented.

APPENDIX 5

PRIVACY TRAINING PROGRAM

1. Background

- 1.1 The "Corporate Privacy Rules: Controller Policy" ("**Controller Policy**") provide a framework for the transfer of personal information between Intel group members. The document sets out the requirements for Intel to train its workers on the requirements of the Controller Policy.
- 1.2 Intel will train workers (including new hires, temporary staff and individual contractors whose roles bring them into contact with personal information) on the basic principles of data protection, confidentiality and information security awareness. This will include training on applicable and relevant data protection laws, including European data protection laws.
- 1.3 Workers who have permanent or regular access to personal information and who are involved in the processing of personal information or in the development of tools to process personal information must receive additional, tailored training on the Controller Policy and specific data protection issues relevant to their role. This training is further described below and is repeated on a regular basis.

2. Responsibility for the Privacy Training Program

- 2.1 Intel's Privacy Office has overall responsibility for privacy training at Intel, with input with colleagues from other functional areas including Information Security, HR and other departments, as appropriate. They will review training from time to time to ensure it addresses all relevant aspects of the Controller Policy and that it is appropriate for individuals who have access to personal information, who are involved in the processing of personal information or in the development of tools to process personal information.
- 2.2 Intel's management is committed to the delivery of data protection/privacy training courses, and will ensure that workers are required to participate, and given appropriate time to attend, such courses. Course attendance will be measured and reported out via regular quarterly updates to privacy leadership.
- 2.3 If these training audits reveal persistent non-attendance or non-completion, this will be escalated to the Compliance and Ethics Oversight Committee and CIO for action. Such action may include escalation of non-attendance or non-completion to appropriate managers within Intel who will be responsible and held accountable for ensuring that the individual(s) concerned attend and actively participate in such training.

3. Delivery of the training courses

- 3.1** Intel will deliver privacy training in a variety of ways including electronic training courses through its on-line learning platform, written materials, recorded content and a variety of face to face training for workers. The courses are designed to be both informative and user-friendly, generating interest in the topics covered, and provide appropriate levels of training (dependent on role requirements) to all workers.
- 3.2 All Intel workers are required to complete data protection training (including training on the Controller Policy):
- (a) as part of their induction program;
 - (b) before being granted access to identified tools or resources which require access to personal data;
- 3.3 Intel's privacy training content is designed to reflect changes in relevant privacy laws and compliance issues arising from time to time.
- 3.4 Certain workers may receive supplemental specialist training, for example those in sales and marketing, where business activities include processing personal data. Specialist training will be tailored as necessary to the course participants.

4. Training on data protection

4.1 Intel's training on data protection and the Controller Policy will cover the following main areas:

4.1.1 Background and rationale:

- (a) What is data protection law?
- (b) What are key data protection terminology and concepts?
- (c) What are the data protection principles?
- (d) How does data protection law affect Intel internationally?
- (e) What are Intel's Corporate Privacy Rules and the associated requirements?

4.1.2 The Controller Policy:

- (a) An explanation of the Controller Policy
- (b) The scope of the Controller Policy

- (c) The requirements of the Controller Policy
- (d) Practical examples of how and when the Controller Policy applies
- (e) The rights that the Controller Policy gives to individuals
- (f) The privacy implications arising from processing personal information for clients

4.1.3 Where relevant to a worker's role, training will cover the following procedures under the Controller Policy:

- (a) Data Subject Rights Procedure
- (b) Audit Protocol
- (c) Updating Procedure
- (d) Cooperation Procedure
- (e) Complaint Handling Procedure
- (f) Government Data Request Response Procedure

APPENDIX 6

AUDIT PROTOCOL

1. Background

- 1.1 Intel's "Corporate Privacy Rules: Controller Policy" (the "**Controller Policy**") safeguard personal information transferred between the Intel group members.
- 1.2 Intel will audit its compliance with the Controller Policy on a regular basis and this document describes how and when Intel will perform such audits. Although this Audit protocol describes the formal assessment process by which Intel will audit its compliance with the Controller Policy, this is only one way in which the provisions of the Controller Policy are observed and corrective actions taken as required.
- 1.3 In particular, Intel's Privacy Office provides ongoing guidance about the processing of personal information and will continually assess the processing of personal information by group members for potential privacy-related risks and compliance with the Controller Policy.

2. Conduct of an audit

2.1 *Overview of audit requirements*

- 2.1.1 Compliance with the Controller Policy is overseen on a day to day basis by the Intel Privacy Office. The European Data Protection Officer is responsible for performing and/or overseeing audits of compliance with the Controller Policy and will design such audits to address all aspects of the Controller Policy. The European Data Protection Officer will monitor the reported measurements of compliance provided by the Intel Privacy Office.
- 2.1.2 The Intel Privacy Office or European Data Protection Officer will raise any issues or instances of non-compliance with the Controller Policy to legal and operational management so that corrective actions may be determined and implemented within a reasonable time. Serious non-compliance issues will be escalated to Intel's company management (including, where appropriate, Intel's General Counsel, the Ethics and Compliance Oversight Committee, Executive Officers and/or Board of Directors) in accordance with paragraph 2.5.1.

2.2 *Frequency of audit*

- 2.2.1 Audits of compliance with the Controller Policy will be conducted:
 - (a) at least annually in accordance with Intel's audit procedures; and/or

- (b) at the request of the Ethics and Compliance Oversight Committee, Internal Audit and / or the Board of Directors; and/or
- (c) As otherwise determined necessary by the Intel Privacy Office or European Data Protection Officer (for example, in response to a specific incident)

2.3 *Scope of audit*

2.3.1 The European Data Protection Officer, in collaboration with the Intel Privacy Office, and any other Intel workers deemed necessary, will determine the scope of an audit following a risk-based analysis, taking into account relevant criteria such as:

- (a) areas of current regulatory focus;
- (b) areas of specific or new risk for the business;
- (c) areas with changes to the systems or processes used to safeguard information;
- (d) use of innovative new tools, systems or technologies;
- (e) areas where there have been previous audit findings or complaints;
- (f) the period since the last review; and
- (g) the nature and location of the personal information processed.

2.4 *Auditors*

2.4.1 Audit of the application and implementation of the Controller Policy (including any related procedures and controls) will be undertaken by the European Data Protection Officer, in collaboration with the Intel Privacy Office, and other retained internal and external resources as deemed appropriate by the Intel Privacy Office. In addition, Intel may appoint independent and experienced professional auditors, with approval of legal members of the Privacy Office and/or Internal Audit, acting under a duty of confidence and in possession of the required professional qualifications as necessary to perform audits of the Controller Policy (including any related procedures and controls). Intel's Privacy Office will manage and provide quality assurance of audit work performed by others.

2.5 *Reporting*

2.5.1 Data protection audit reports will be reviewed by senior members of the Intel Privacy Office. If the report reveals breaches or the potential for breaches of a serious nature (for example, presenting a

risk of potential harm to individuals or to the business), the Intel Privacy Office will escalate these for review by the General Counsel, Ethics and Compliance Oversight Committee, CEO, CIO and CFO as appropriate.

2.5.2 Upon request the information provided, Intel will provide copies of the results of data protection audits of the Controller Policy (including any related procedures and controls) to the competent data protection authorities.

2.5.3 The European Data Protection Officer is responsible for liaising with the competent data protection authorities for the purpose of providing the information outlined in paragraph 2.5.2.

2.6 *Data protection authority audits*

2.6.1 The competent data protection authorities may audit group members for compliance with the Controller Policy (including any related procedures and controls) in accordance with the Intel Corporate Privacy Rules: Cooperation Procedure (Appendix 8).

APPENDIX 7

COMPLAINT HANDLING PROCEDURE

1. Background

- 1.1 Intel's "Corporate Privacy Rules: Controller Policy" ("**Controller Policy**") safeguard personal information transferred between the Intel group members.
- 1.2 This Complaint Handling Procedure describes how complaints, questions, enquiries and concerns ("**complaints**") may be brought by an individual whose personal information is processed by Intel under the Controller Policy will be addressed and resolved.
- 1.3 This procedure will be made available to individuals whose personal information is processed by Intel under the Controller Policy.

2. Enquiries from data protection authorities

- 2.1 Any enquiry received from a data protection authority will be immediately referred to the Intel Privacy Office for appropriate action and response in accordance with the Intel Corporate Privacy Rules: Cooperation Procedure (Appendix 8).

3. How individuals can raise complaints

- 3.1 Any individual may raise a data protection a complaint (whether related to the Controller Policy or not) by the following means:

(a) Online at: <https://www.intel.com/content/www/us/en/forms/privacy-contact-us.html>; or

(b) Postal mail to:

Intel Corporation
Attention: Intel Privacy Office
2200 Mission College Blvd.
Santa Clara,
CA 95054
USA

OR

Intel Ireland Limited
Attention: Intel Privacy Office
Collinstown Industrial Park

Leixlip
Co.Kildare
Ireland
W23 CX68

3.1.2 Note that Intel workers are also required to direct any privacy-related enquiries and complaints to the Intel Privacy Office in a timely manner.

4. Complaint handling process

4.1 Who handles complaints?

4.1.1 The Intel Privacy Office will handle all complaints in respect of personal information for which Intel is a controller, including complaints arising under the Controller Policy. The Intel Privacy Office will liaise with colleagues from relevant business, geographies and support units as necessary to address and resolve complaints.

4.2 What is the response time?

4.2.1 The Intel Privacy Office will acknowledge receipt of a complaint to the individual concerned without undue delay and in any event within five (5) working days of receipt, investigating and making a substantive response within one (1) month.

4.2.2 If, due to the complexity of the complaint, a substantive response cannot be given within this period, the Intel Privacy Office will advise the individual accordingly and provide a reasonable estimate (not exceeding two (2) months) of the timescale within which a substantive response will be provided.

4.3 What happens if an individual disputes a response given?

4.3.1 If the individual notifies the Intel Privacy Office that it disputes any aspect of the response finding, the Intel Privacy Office will review the case and consult further experts, including relevant Data Protection Officer(s) (which, for European data protection law concerns, will include the European Data Protection Officer) as required to resolve the concern. The Intel Privacy Office will advise the individual of his or her decision either to accept the original finding or to substitute a new finding within one (1) month from being notified of the escalation of the dispute provided the timeline shall not exceed three (3) months from initially receiving the complaint or request.

4.3.2 If, due to the complexity of the dispute, a substantive response cannot be given within one (1) month of its escalation, the Intel Privacy Office will advise the complainant accordingly and provide a reasonable estimate for the timescale within which a response will be provided which will not exceed two (2) months from the date the dispute was escalated.

4.3.3 If the complaint is upheld, the Intel Privacy Office will arrange for any necessary steps to be taken as a consequence.

5. Right for individuals to complain to a competent data protection authority and to commence proceedings

5.1 Overview

5.1.1 Where individuals' personal information are processed in Europe by a group member acting as a controller and/or transferred to a group member located outside Europe under the Controller Policy then those individuals have certain additional rights to pursue effective remedies for their complaints, as described below.

5.1.2 The individuals described above have the right to complain to a competent data protection authority (in accordance with paragraph 5.2) and/or to commence proceedings in a court of competent jurisdiction (in accordance with paragraph 5.3), whether or not they have first complained directly to Intel under this Complaints Handling Procedure.

5.1.3 Intel accepts that complaints and claims made pursuant to paragraphs 5.2 and 5.3 may be lodged by a non-for-profit body, organisation or association acting on behalf of the individuals concerned.

5.2 Complaint to a data protection authority

5.2.1 If an individual wishes to complain about Intel's processing of his or her personal information to a data protection authority, on the basis that a European group member has processed personal information in breach of the Controller Policy or in breach of applicable data protection laws, he or she may complain about that European group member to the data protection authority in the European territory:

- (a) (a) of his or her habitual residence;
- (b) of his or her place of work; or
- (c) where the alleged infringement occurred.

5.2.2 If an individual wishes to complain about Intel's processing of his or her personal information to a data protection authority, on the basis that a non-European group member has processed personal information in breach of the Controller Policy, then where Part IV of the Controller Policy applies Intel Ireland Limited will submit to the jurisdiction of the competent data protection authority (determined in accordance with paragraph 5.2.1 above) in place of that non-European group member, as if the alleged breach had been caused by Intel Ireland Limited.

5.3 Proceedings before a national court

5.3.1 If an individual wishes to commence court proceedings against Intel, on the basis that a group member has processed personal information in breach of the Controller Policy or in breach of applicable data protection laws, then he or she may commence proceedings against that European group member in the European territory:

(a) in which that European group member is established; or

(b) of his or her habitual residence.

5.3.2 If an individual wishes to commence court proceedings against Intel, on the basis that a non-European group member has processed personal information in breach of the Controller Policy, then where Part IV of the Controller Policy applies Intel Ireland Limited will submit to the jurisdiction of the competent data court (determined in accordance with paragraph 5.3.1 above) in place of that non-European group member, as if the alleged breach had been caused by Intel Ireland Limited.

APPENDIX 8

CO-OPERATION PROCEDURE

1. Background

- 1.1 Intel's Corporate Privacy Rules: Cooperation Procedure sets out the way in which Intel will cooperate with competent data protection authorities in relation to the "Intel Corporate Privacy Rules: EU Controller Policy" ("**Controller Policy**").

2. Cooperation Procedure with Data Protection Authorities

- 2.1 Where required, Intel will make the necessary personnel available for dialogue with a competent data protection authority in relation to the Controller Policy.
- 2.2 Intel Privacy Office will review, consider and comply with:
- (a) any advice or decisions of relevant competent data protection authorities on any data protection law issues that may affect the Controller Policy; and
 - (b) any guidance published by data protection authorities (including the European Data Protection Board or any successor to it) in connection with Binding Corporate Rules for Controllers.
- 2.3 Intel Privacy Office will provide upon request copies of the results of any audit it conducts of the Controller Policy to a competent data protection authority.
- 2.4 Intel agrees that a competent data protection authority may audit any group member located within its jurisdiction for compliance with the Controller Policy, in accordance with applicable data protection laws.
- 2.5 Intel agrees to abide by a formal decision of any competent data protection authority on any issues relating to the interpretation and application of the Controller Policy (unless and to the extent that Intel is entitled to appeal any such decision and has chosen to exercise such right of appeal).

3. Cooperation Procedure between Group Members

- 3.1 Group Members will cooperate and assist each other and the Intel Privacy Office when handling requests or complaints regarding the Controller Policy from individuals and / or company data protection authorities.
- 3.2 Group Members will comply with any instructions from Intel Ireland Limited or Intel Corporation requiring a remedy of a breach of the Controller Policy.

APPENDIX 9

UPDATING PROCEDURE

1. Background

1.1 Intel's Corporate Privacy Rules: Updating Procedure describes how Intel will communicate changes to the "Corporate Privacy Rules: EU Controller Policy" ("**Controller Policy**") to competent data protection authorities, individual data subjects, and to Intel group members bound by the Controller Policy.

1.2 Any reference to Intel in this procedure is to the Intel Privacy Office, which is accountable for ensuring that the commitments made by Intel in this Updating Procedure are met.

2. Record keeping

2.1 Intel will maintain a change log which setting out details of each and every revision made to the Controller Policy, including the nature of the revision, the reasons for making the revision, the date the revision was made, and who authorised the revision.

2.2 Intel must also maintain an accurate and up-to-date list of group members that are bound by the Controller Policy.

2.3 The Intel Privacy Office shall be responsible for ensuring that the records described in this paragraph 2 are maintained and kept accurate and up-to-date.

3. Changes to the Controller Policy

3.1 All proposed changes to the Controller Policy must be reviewed and approved by the Intel Privacy Office so that a high standard of protection is maintained for the data protection rights of individuals who benefit from the Controller Policy. No changes to the Controller Policy shall take effect unless reviewed and approved by the Intel Privacy Office.

3.2 Intel Privacy Office will communicate all changes to the Controller Policy (including reasons that justify the changes):

- (a) to the group members bound by the Controller Policy via written notice (which may include e-mail or posting on an internal Intranet accessible to all group members);
- (b) to individuals who benefit from the Controller Policy via online publication at www.intel.com; and

- (c) to the data protection authority that was the lead authority for the purposes of granting Intel's BCR authorisation ("**Lead Authority**"), and any other relevant data protection authorities the Lead Authority may direct, at least once a year.

4. Communication of material changes

- 4.1 If Intel makes any material changes to the Controller Policy or to the list of group members bound by the Controller Policy that affect the level of protection offered by the Controller Policy or otherwise significantly affect the Controller Policy (for example, by making changes to the binding nature of the Controller Policy), it will promptly report such changes (including the reasons that justify such changes) to the Lead Authority and all group members.

5. Transfers to new group members

- 5.1 If Intel intends to transfer personal information to any new group members under the Controller Policy, it must first ensure that all such new group members are bound by the Controller Policy before transferring personal information to them.

APPENDIX 10

GOVERNMENT DATA REQUEST RESPONSE PROCEDURE

1. Background

1.1 Intel's Corporate Privacy Rules: Government Data Request Response Procedure sets out Intel's procedure for responding to a request received from a law enforcement authority or state security body (together the "**Requesting Authority**") to disclose personal information processed by Intel (hereafter "**Data Disclosure Request**").

1.2 Where Intel receives a Data Disclosure Request, it will handle that Data Disclosure Request in accordance with this Procedure. If applicable data protection law(s) require a higher standard of protection for personal information than is required by this Procedure, Intel will comply with the relevant requirements of applicable data protection law(s).

2. General principle on Data Disclosure Requests

2.1 As a general principle, Intel does not disclose personal information in response to a Data Disclosure Request unless either:

- it is under a compelling legal obligation to make such disclosure (such as a Court order or a statutory duty to make disclosure); or
- taking into account the nature, context, purposes, scope and urgency of the Data Disclosure Request and the privacy rights and freedoms of any affected individuals, there is an imminent risk of serious harm that merits compliance with the Data Disclosure Requests in any event.

2.2 For that reason, unless it is legally prohibited from doing so or there is an imminent risk of serious harm, Intel will notify the competent data protection authorities about the Data Disclosure Request while cooperating with the Requesting Authority, as described in paragraph 3 below.

3. Handling of a Data Disclosure Request

3.1 *Receipt of a Data Disclosure Request*

3.1.1 If an Intel group member receives a Data Disclosure Request, the recipient of the request must pass it to Intel's Privacy Office immediately upon receipt, indicating the date on which it was received together with any other information which may assist Intel's Privacy Office to deal with the request.

3.1.2 The request does not have to be made in writing, made under a Court order, or mention data protection law to qualify as a Data Disclosure Request. Any Data Disclosure Request, howsoever made, must be notified to the Intel Privacy Office for review.

3.2 *Initial steps*

3.2.1 The Intel Privacy Office will carefully review each and every Data Disclosure Request on a case-by-case basis, and deal with the request to determine the nature, context, purposes, scope and urgency of the Data Disclosure Request, as well as its validity under applicable laws, in order to identify whether action may be needed to challenge the Data Disclosure Request.

3.2.2 Intel will refer to and apply any specific procedures that it has established to govern the process by which further engagement takes place (for example, how to identify whether a compelling legal Data Disclosure Request has been made). Any such procedures shall be consistent with the requirements of this Government Data Request Response Procedure.

4. **Notice of a Data Disclosure Request**

4.1 *Notice to the competent Data Protection Authorities*

4.1.1 Intel will put the request on hold in order to notify and consult with the competent Data Protection Authorities, unless legally prohibited or where an imminent risk of serious harm exists that prohibits prior notification.

4.1.2 Where Intel is prohibited from notifying the competent Data Protection Authorities and suspending the request, Intel will use its best efforts (taking into account the nature, context, purposes, scope and urgency of the request) to inform the Requesting Authority about its obligations under applicable data protection law and to obtain the right to waive this prohibition. Such efforts may include asking the Requesting Authority to put the request on hold so that Intel can consult with the competent Data Protection Authorities, which may also, in appropriate circumstances, include seeking a court order to this effect. Intel will maintain a written record of the efforts it takes.

5. **Transparency reports**

5.1 If, despite having used its best efforts, Intel is not in a position to notify the competent Data Protection Authorities, Intel commits to preparing an annual report (a “**Transparency Report**”), which reflects to the extent permitted by applicable laws, the number and type of Data Disclosure Requests it has received for the preceding year and the Requesting Authorities who made those requests. Intel shall provide this report to the lead data protection authority which authorized the Controller Policy (and any other data protection authorities that the lead authority may direct) once a year.

6. Bulk transfers

- 6.1 Intel shall not transfer personal information to a Requesting Authority in a massive, disproportionate and indiscriminate manner that goes beyond what is necessary in a democratic society.

APPENDIX 11

MATERIAL SCOPE OF THE CONTROLLER POLICY

1. Background

1.1 Intel's "Binding Corporate Rules: EU Controller Policy" (the "**Controller Policy**") provide a framework for the transfer of personal information between Intel group members.

1.2 This document sets out the material scope of the Controller Policy. It specifies the data transfers or set of transfers, including the nature and categories of personal information, the type of processing and its purposes, the types of individuals affected, and the identification of the third countries.

2. Human Resources Data

Who transfers the personal information described in this section?	Every Intel group member inside of Europe may transfer the personal information that they control described in this section to every Intel group member outside of Europe.
Who receives this personal information?	Every Intel group member outside of Europe may receive the personal information described in this section which is transferred to them by Intel group members inside of Europe.
What categories of personal information are transferred and who are the types of individuals whose personal information are transferred?	<ul style="list-style-type: none"> i. Candidates: name, contact details, employment history, qualifications, education, and references. ii. Employees: details collected in relation to the recruitment process (see above), performance data (including promotion information, performance management data, disciplinary information), financial data (bank details for payment of salary, bonus and benefits), medical information (limited to that which is necessary in order to provide reasonable accommodations), emergency contact details, details of beneficiaries and dependants (benefits administration required data), and personal data collected from the employees' use of Intel's assets (e.g., use of Intel mobile phones, calls made, use of Intel resources, transmission of data on Intel devices, etc.) and information submitted voluntarily by employees, e.g., in the context of employee surveys aimed at improving diversity and inclusion at Intel. iii. Independent Contractors: name, contact details, education background, occupational history, government issued identification or other identification numbers and physical location, information about the contingent worker's employer (e.g. the agency supplying them), time worked (e.g. hours or days) for compensation purposes, contingent worker's preferred contact in

	<p>case of emergency, or identification or travel profile data if business travel is required, and use of Intel assets (where applicable), which may include identifying hardware data, network connection information, IP address and geographic location (such as through GPS, Bluetooth or WiFi signals).</p> <p>iv. Ex-Employees: details collected during employment, termination reasons, asset return, post-termination contact details (if different to during employment).</p> <p>v. Ex-Independent Contractors: certain details collected during the term of their engagement with Intel, termination reasons, and details on Intel asset return.</p> <p>vi. Non-employee-related data: Beneficiary data (e.g. names, dates of birth) for life assurance benefits (where provided); name, date of birth, email address for the provision of healthcare benefits (where added to employees' policy); details to be found in the policy documents for the relevant service.</p>
<p>Are categories of sensitive personal information transferred?</p>	<p>Medical information may be transferred if such information is necessary to provide reasonable accommodations for an individual employee or independent contractor. Other categories of sensitive personal information may be transferred, depending on an individual situation, such as information in relation to disciplinary actions, background checks (where permitted by law) or (if submitted voluntarily by employees e.g., in the context of an employee survey on diversity and inclusion) information on racial or ethnic origin, or sexual orientation.</p>
<p>Why is this personal information transferred and how will it be used?</p>	<p>Why is this personal information transferred?</p> <p>All group members have access to employee directory information (including names, job title, contact information and skills) to collaborate on projects across geographic borders; group members support each other with respect to hiring, mentoring, and professional development across borders; managers access performance and development information regarding employees of other group members as necessary for human resources and talent management purposes; group members assist each other with respect to technology and administrative resources to optimize payroll and benefits administration.</p> <p>How will this personal information be used?</p> <ul style="list-style-type: none"> • Candidates: Recruitment and hiring, including interviewing, assessing suitability for permanent or temporary employment, making travel arrangements (where

	<p>applicable), background checking (to the extent permitted under law), and hiring processes.</p> <ul style="list-style-type: none"> • Employees: Managing the employment relationship, including delivery of applicable compensation and benefits programs; human resources practices, including onboarding, promotion, retention and discipline; centralizing and processing human resources information; participation in company provided programs and events; career development opportunities; promotion of healthy lifestyles and an inclusive working environment (e.g. free from discrimination on grounds of sex, sexual orientation, racial or ethnic origin, or disability); assurance of a safe (e.g. protect against physical or digital security threats) working environment and legal obligations (e.g. investigating violations of law of company policy, responding to legal warrants or discovery processes), including notifying family members or designated contacts in case of emergency; assessing suitability for employment or particular position. • Independent Contractors: Managing the contractual relationship with contingent workers, including documenting Statements of Work or similar orders; onboarding which includes completion of forms and issuance of assets, processing compensation, engaging with the worker during the assignment, assurance of a safe working environment (e.g. protect against physical or digital security threats) and legal obligations (e.g. investigating violations of law of company policy, responding to legal warrants or discovery processes), including notifying family members or designated contacts in case of emergency and business travel related processing. • Ex-Employees: Post-termination processing, including offboarding, transfer of benefits provision, meeting legal and compliance obligations (e.g. relating to data retention periods). • Non-employee Data: Provision of services and benefits (e.g. to dependents and family members); emergency contact in case of injury/death of an employee.
<p>Where is this personal information processed?</p>	<p>The personal information described in this section may be processed in every territory where Intel group members or their processors (meaning processors that are also members of the Intel group) are located. A list of Intel group member locations is available at: https://www.intel.com/content/www/us/en/location/worldwide.html</p>

3. **Customer Relationship Management Data**

<p>Who transfers the personal information described in this section?</p>	<p>Every Intel group member inside of Europe may transfer the personal information that they control described in this section to every Intel group member outside of Europe.</p>
<p>Who receives this personal information?</p>	<p>Every Intel group member outside of Europe may receive the personal information described in this section which is transferred to them by Intel group members inside of Europe.</p>
<p>What categories of personal information are transferred and who are the types of individuals whose personal information are transferred?</p>	<ul style="list-style-type: none"> i. General customer information: name, contact details and, where relevant, bank account information. ii. Newsletter subscribers, account creator and information requestors: name, contact details and feedback or preferences. iii. Social media users: information from third party operating sites or services to which Intel links; information provided by app developers or providers, social media platform providers, operating system provider, wireless service provider or device manufacturers, including any personal information that data subject discloses to other organizations through or in connection with the relevant Intel services or Intel social media pages. iv. Research, analysis and studies participants: name, contact details, data subject input into the study/research, feedback or preferences. v. Sweepstakes, contests, and similar promotions participants: name, contact details. vi. Recipients of advertising and marketing materials: name, contact details, times of visits by device and traffic sources, actions made by the device owner, device owner’s interests and other data used to provide enhanced functionality and personalization. vii. Web pages visitors: IP address, location of device, times of visits by device and traffic sources, actions made by the device owner, device owner’s interests and other data used to provide enhanced functionality and personalization (according to user preferences).

<p>Are categories of sensitive personal information transferred?</p>	<p>The following types of sensitive personal information will be transferred from time to time:</p> <ul style="list-style-type: none"> • Social media users: any sensitive information a user decides to disclose during their use of social media. • Research analysis and studies participants: depending on the focus area of a research project, sensitive data may be transferred.
<p>Why is this personal information transferred and how will it be used?</p>	<p>Why is this personal information transferred?</p> <p>Intel is a globally operating company, with customers located in different parts of the world. In order to support Intel’s global operations, Intel has employees, business units and company functions located at different international Intel sites. Personal information needs to be transferred internationally, so that employees working in different business units and/or in different company functions can have access to the personal information required to complete assigned tasks, to collaborate with colleagues located at different international sites and to generally keep Intel’s businesses running.</p> <p>How will this personal information be used?</p> <ul style="list-style-type: none"> • Provide goods or services to the customer and perform related tasks, such as product delivery, to send messages; to ship products and process payments; to respond to customer service requests; to provide alerts such as security updates or changes in our policies or about subscriptions that are ending; and to send marketing or informational materials like newsletters or white papers, in accordance with data subject communication preferences. • In order to allow for social-media interaction and content sharing. • Conduct research, analysis, historical and scientific studies either alone or with partners, e.g., surveys, or focused research or studies. • Conduct sweepstakes, contests, and similar promotions. • Enable joint products or research studies, or to facilitate services like message boards, blogs or other shared platforms. • To enable personalized content and to study the effectiveness of advertising and marketing campaigns. • To improve user experience, by providing visitors with personalized content, and remembering preferences.
<p>Where is this personal</p>	<p>The personal information described in this section may be processed in every territory where Intel group members or their processors (meaning processors that are also members of the Intel group) are located. A list of</p>

information processed?	Intel group member locations is available at: https://www.intel.com/content/www/us/en/location/worldwide.html
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4. Supply Chain Management Data

Who transfers the personal information described in this section?	Every Intel group member inside of Europe may transfer the personal information that they control described in this section to every Intel group member outside of Europe.
Who receives this personal information?	Every Intel group member outside of Europe may receive the personal information described in this section which is transferred to them by Intel group members inside of Europe.
What categories of personal information are transferred and who are the types of individuals whose personal information are transferred?	The following personal information is collected from individual contractors, account managers and workers of third party suppliers to Intel: <ul style="list-style-type: none"> • business contact information (name, job title, email and phone number); • skills and Intel procurement history; and • information described above at no. 3 (iii) & (v) may also be collected from individual contractors, depending on the services being provided to Intel.
What categories of sensitive personal information (if any) are transferred?	Medical information may be transferred if such information is necessary to provide reasonable accommodations for an individual contractor. Other categories of sensitive personal information may be transferred, depending on an individual situation, such as information in relation to background checks on individual contractors (where permitted by law).
Why is this personal information transferred and how will it be used?	Business contact information is required for every engagement to facilitate transactions. Specific personal data is transferred for defined business needs as specified in the procurement agreement (e.g. HR data transferred to payroll processors to provide services required to calculate and pay compensation to individual contractors) or participant/customer data to support sales/marketing events and transactions.

<p>Where is this personal information processed?</p>	<p>The personal information described in this section may be processed in every territory where Intel group members or their processors (meaning processors that are also members of the Intel group) are located. A list of Intel group member locations is available at: https://www.intel.com/content/www/us/en/location/worldwide.html.</p>
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