

## Trellix Drive Encryption - SaaS (DE - SaaS) with Optional Mobile Device Application

The purpose of this Privacy Data Sheet is to provide Customers of Trellix Drive Encryption - SaaS (DE - SaaS) with details on how Trellix captures, processes, and stores<sup>1</sup> telemetry information, including personal data (or personally identifiable information), to help them understand and assess the impact of the telemetry capabilities on their overall privacy posture.

Trellix DE - SaaS is a solution which protects servers, computer systems, laptops and tablets against known and unknown threats like malware, suspicious communications, unsafe websites and files made available by Trellix to companies or persons who obtain a Trellix DE - SaaS subscription.

Trellix will process personal data from DE - SaaS in a manner that is consistent with this Privacy Data Sheet. In jurisdictions that distinguish between Data Controllers and Data Processors, Trellix is the Data Controller for the personal data processed to administer and manage the Customer relationship. Trellix is the Data Processor for the personal data processed by DE - SaaS in order to provide its functionality.

This Privacy Data Sheet is a supplement to the [Trellix Website Privacy Notice](#).

### Product Overview

Trellix DE - SaaS features deliver encryption that protects data from unauthorized access, loss, and exposure using preboot authentication and a powerful encryption engine. The DE - SaaS provides multiple layers of defense against data loss with integrated modules that address specific areas of risk. DE - SaaS provides protection for individual computers and roaming laptops with an Unified Extensible Firmware Interface (UEFI).

#### The Drive Encryption - SaaS solutions allows Trellix Customers to:

- Enforce access control settings using pre-boot authentication;

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<sup>1</sup> In this document, we adopt the broad definition of “processing” that appears at Article 4(2) of the GDPR: “‘processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means ...”, which includes, but is not limited to the following non-exhaustive series of examples: “collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.”

- Apply certified encryption algorithms (FIPS);
- Support mixed-device environments, including solid-state drives; and
- Support Trusted Computing Group (TCG) Opal self-encrypting drives.

The DE - SaaS solution includes encryption software installed within Trellix Customers' network environment and integrates with Trellix's ePolicy Orchestrator's - SaaS (ePO- SaaS) command center interface and captures information through the ePO server. Applied Customer security policies are utilized through the DE - SaaS solution which are enforced throughout the Customer's entire network infrastructure. DE - SaaS's disk encryption process is transparent to the Security Operations Administrators (SecOps Admins) and Security Operators (Sec Ops) team members and has minimal impact on CPU or overall device performance.

Trellix DE - SaaS delivers powerful encryption solutions that protect against unauthorized access of data, data loss, and unintended exposure of important data. Trellix DE - SaaS encrypts all computer disk drives integrated within Trellix Customers' network infrastructure and secures the data within a device, where data is stored at rest. Only authorized users who are authenticated in a pre-boot environment will have capabilities to access the data locally stored on the device.

Devices within the Customer network infrastructure running Trellix DE - SaaS are managed from ePO's command center. DE - SaaS integrates with ePO services located entirely within the Customer's network infrastructure or integrated with Trellix's instance in Amazon Web Services (AWS).

Trellix DE - SaaS features provide full disk encryption for Microsoft Windows laptops and desktop PCs and prevents the loss of sensitive data, especially from lost or stolen equipment.

**Trellix Drive Encryption - SaaS includes the following security features:**

- **Centralized management** — DE - SaaS integrates fully into Trellix ePO - SaaS, leveraging the Trellix ePolicy Orchestrator infrastructure for automated security reporting, monitoring, deployment, and policy administration.
- **Transparent encryption** — DE - SaaS enables transparent encryption without hindering users or system performance.
- **Access control** — DE - SaaS enforces access control with Pre-Boot Authentication (PBA).
- **Recovery** — The recovery feature allows the user to perform emergency recovery when the system fails to reboot, or its Pre-Boot File System (PBFS) is corrupt.
- **Support for self-encrypting drives** — DE - SaaS and Trellix ePO - SaaS enable centralized management of self-encrypting drives that conform to the Opal standard from Trusted Computing Group (TCG), including locking and unlocking, reporting, recovery, policy enforcement, and user management.
- **Trusted Platform Module (TPM)** — DE - SaaS supports TPM to provide platform authentication without the need for PBA.

**Trellix Drive Encryption - SaaS includes optional mobile device application:**

- **Trellix Endpoint Assistant (Trellix EA)** is an application for mobile devices that works in conjunction with Trellix DE - SaaS to simplify the process of recovering a forgotten credential for a managed device encrypted with DE - SaaS.

## Trellix Drive Encryption - SaaS can be implemented as a managed deployment:

- ✓ **Trellix DE - SaaS via ePolicy Orchestrator - SaaS (ePO - SaaS) deployment:** Customers use tenant credentials for ePO- SaaS to create/deploy, manage, and enforce security policies. Customers can use the queries and dashboards options to track detections, activities, and status of their managed network environment within their organization.
  - Note that Customers can use the Offline Activation feature to activate DE - SaaS within a Customer’s network infrastructure without connecting to the Trellix ePO - SaaS server.

Please see [Trellix Data Encryption](#) for additional information related to the Trellix Data Encryption solution.

Please also see [Trellix ePolicy Orchestrator SaaS \(ePO-SaaS\)](#) for additional information related to the Trellix ePO – SaaS solution.

## Personal Data Processing

Trellix DE - SaaS encrypts Trellix Customers’ computer disk drives across their entire network infrastructure to provide encrypted security to data locally stored within the devices. Only Security Operators (SO’s) who are authenticated in a pre-boot environment can access the encrypted data at rest.

The access control feature contains one or more SO’s who are assigned as an authorized system user from within the management console of ePO’s command center, or assigned automatically via the “Add Local Domain Users” dynamic access control feature. The overall access control feature contains information about the Customer’s SO only for the purpose of authentication within the pre-boot phase. Trellix DE - SaaS captures data to perform authentication and security features and to enforce Customer security policies.

- **Trellix DE - SaaS via ePolicy Orchestrator - SaaS (ePO - SaaS) deployment:** The captured information is sent automatically via Trellix Agent by way of SSL/HTTPS connection to the Trellix ePO - SaaS server/database.

As a result, Trellix DE - SaaS may process a range of data potentially containing personal information. The table below shows the personal data processed by Trellix DE- SaaS to provide its services and describes why the data is processed.

**Table 1. Personal Data Processed by Trellix Drive Encryption - SaaS**

Personal Data Category	Types of Personal Data Processed	Purpose of Processing
Administrative Data	<u>General identification information:</u> <ul style="list-style-type: none"> <li>● User Question &amp; Answer</li> <li>● User Name</li> <li>● User Display Name</li> <li>● User Distinguished Name</li> <li>● User Account Control</li> <li>● User SAM Account Name</li> </ul>	Required to enable product functionality (access control, recovery). Required for product diagnostics.

	<ul style="list-style-type: none"> <li>● User Domain Name</li> <li>● User ID</li> </ul>	
Generated Data	<u>Incidents / Events / Logs:</u> <ul style="list-style-type: none"> <li>● Trellix Agent GUID</li> <li>● System Model</li> <li>● System Manufacturer</li> <li>● User Name</li> <li>● User Object ID</li> <li>● Audit Logs</li> </ul>	Required for product diagnostics and auditing.
Collected Data	<u>Configuration information:</u> <ul style="list-style-type: none"> <li>● User AD credentials</li> <li>● User Question &amp; Answer</li> <li>● User Name</li> <li>● User Display Name</li> <li>● User Distinguished Name</li> <li>● User Account Control</li> <li>● User SAM Account Name</li> <li>● User Domain Name</li> <li>● User ID</li> </ul>	Required to enable product functionality (access control, recovery, password synchronization, Single Sign-On).

**\*Please note the Personal Data Categories explained below and used throughout Privacy Data Sheets for Trellix products and/or services::**

**Administrative Data:** Information to enable the service and/or manage the Customer relationship;

**Generated Data:** Information generated by the product (events, evidence, logs);

**Collected Data:** Information generated by the Customer (policies and configurations).

## Data Center Locations

Trellix uses its own data centers as well as third-party infrastructure providers to deliver the service globally. DE – SaaS processes the personal data in Trellix’s instance in AWS regional clouds located in the United States, Germany and India. Trellix’s regional clouds provide options to address Customers’ data location preferences. Customers have the choice to select a region or to default to their nearest region for data processing. This means that, unless otherwise modified by a system administrator, the traffic in certain countries will be directed to a defined compute location.

**Table 2. Data Center Locations**

Data Center Provider	Data Center Location
AWS	AWS West (Oregon)
AWS	Germany (Frankfurt)
AWS	India (Mumbai)

## Subprocessors

Trellix partners with service providers that act as subprocessors for the DE - SaaS service and contracts to provide the same level of data protection and information security that you can expect from Trellix. A current list of subprocessors for the service is below:

**Table 3. Subprocessors**

Subprocessor	Personal Data Category	Service Type	Location of Data Center
AWS	See Table 1	Data Center	AWS West (Oregon)
AWS	See Table 1	Data Center	Germany (Frankfurt)
AWS	See Table 1	Data Center	India (Mumbai)

## Cross-Border Data Transfer

In the event of a need to share personal information with Trellix personnel in regions outside of those identified in the Data Center Locations section above, we will do so in compliance with applicable requirements for transfer of personal data, including those of the [EU Standard Contractual Clauses](#) as approved by the European Commission and/or other legal instruments recognized by EU data protection laws. For a more detailed assessment of our international data transfers, please refer to the Trellix [Transfer Impact Assessment](#) statement.

## Access Control

Access to Customer information is subject to Trellix's Access Management Policy. Access is protected by multiple authentication and authorization mechanisms. Trellix has an account administration application that provides a central access point to request and perform administrative functions for account requests across multiple platforms. All resources have an owner who is responsible for deciding who will be granted access to that resource. Privileged access to resources is restricted to authorized users with a business need, consistent with the concepts of least privilege and segregation of duties based on roles and job functions. Shared accounts are prohibited. All usernames are traceable to a specific human user. User access credentials are promptly removed when user access is no longer authorized (e.g., Trellix employment terminates).

Remote user access by Trellix personnel is performed through a secure virtual private network (VPN) connection that requires multi-factor authentication (MFA). If remote access to production resources is required outside the VPN, then a TLS encrypted connection and MFA are required.

The table below lists the personal data used by Trellix DE - SaaS to carry out the service, who can access that data, and why.

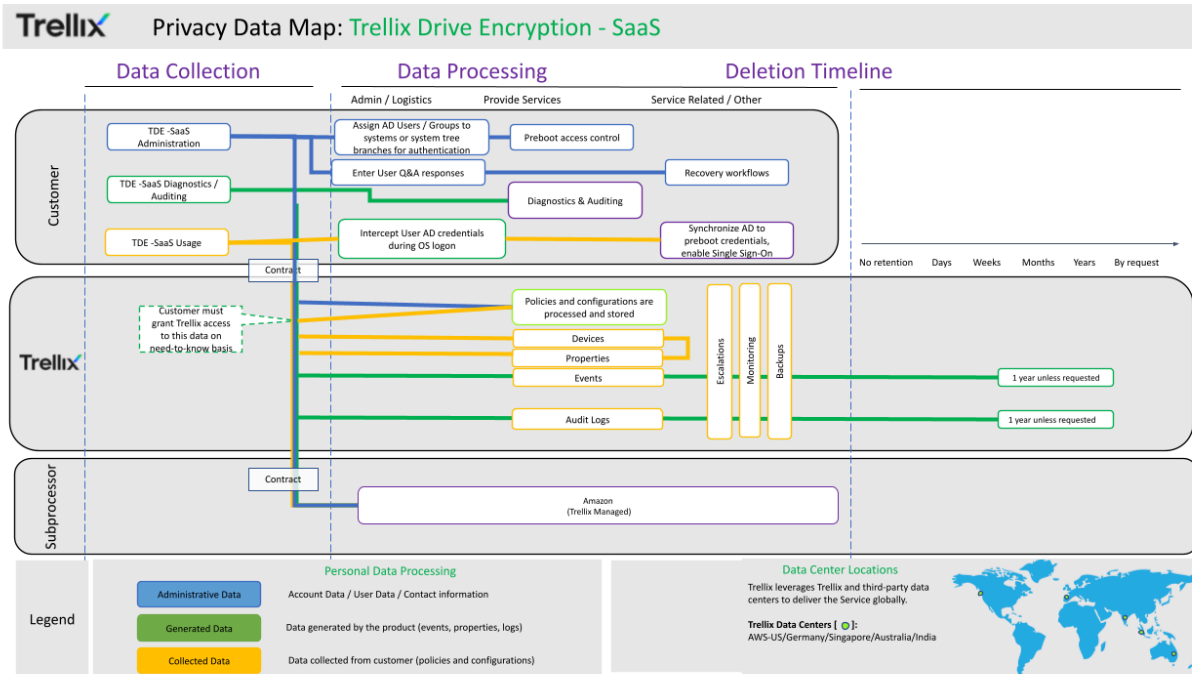
**Table 4. Access Control**

Personal Data Category	Who has access	Purpose of the access
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Administrative Data	Customer	Required for product functionality. Access limited to Customer administrators in accordance with Customer policies and controls.
	Trellix	No default access.  Debugging of the Customer data in the event of an escalation.
Generated Data	Customer	Required for product diagnostics and auditing. Access limited to Customer administrators in accordance with Customer policies and controls.
	Trellix	No default access.  Debugging of the Customer data in the event of an escalation.
Collected Data	Customer	Required for product functionality. Access limited to Customer administrators in accordance with Customer policies and controls.
	Trellix	No default access.  Debugging of the Customer data in the event of an escalation.

## Trellix Drive Encryption - SaaS Data Flow Diagram

The key data flows associated with the information processing activities described in this document are shown below.



## Customer Privacy Options

Trellix designs its products to support our Customers’ compliance with global data protection and compliance obligations. It does this by addressing threat intelligence and security challenges at the application, network, and endpoint levels, and in the cloud. In addition, Trellix offers product features that help our Customers meet their EU General Data Protection Regulation (GDPR) and other legal compliance goals. Such features include, but are not limited to data localization options, policy enforcement, access controls, logging capabilities, individual rights processing, and cross-border data transfer mechanisms.

Customers control whether the DE - SaaS service is enabled or disabled. When it is disabled, no data processed by the service is collected and sent to the Cloud and no data is downloaded by the service from the cloud data centers.

## Data Portability

Except with respect to Registration Information, the Customer can forward the personal data processed by DE - SaaS to a third-party data store. If applicable, to effectuate data portability, Customers may request assistance from Trellix Engineering for a large-scale movement of data (e.g., Customer does not renew subscription and asks for all data to be transferred to a third-party data store).

## Data Deletion and Retention

The table below lists the personal data used by Trellix DE - SaaS, the length of time that data needs to be retained and why we retain it.

A data subject may request deletion of his or her Personal Data by sending a data subject request as described below in this Privacy Data Sheet.

A Customer may request data deletion by submitting a ticket to Trellix support at support\_reply@trellix.com. When a Customer makes a request for deletion, Trellix will purge the requested data from its systems to the extent required by applicable law and may retain administrative data required for legitimate business purposes (e.g., billing records).

**Table 5. Data Retention**

Personal Data Category	Retention Period	Reason for Retention
Administrative Data	Retained until Customer deletes it, (user accounts in SaaS enterprise products are generally retained after their subscription has ended).	Compliance, reporting, troubleshooting.
Generated Data	<u>Retained for 1 Year except for:</u> <ul style="list-style-type: none"> <li>Support case data is retained for 90 days</li> <li>Audit logs are retained for 100 days*</li> </ul>	Compliance, reporting.
Collected Data	Retained until the Customer deletes or until the subscription service ends.	System integrations.

\*Note, audit log data is not accessible by Customers beyond 100 days. Audit logs are purged after 100 days. Backups of audit logs persist for 1 year.

## Personal Data Security

Files stored on or processed by Trellix's systems are secured with state-of-the-art technologies, and Trellix implements rigorous technical and organizational security controls designed to secure personal data from accidental loss and unauthorized access, use, alteration, and disclosure.

Trellix Drive Encryption - SaaS (DE - SaaS) uses a secure portal hosted by AWS to store product data. Data collection is accomplished by downloading an executable tool to the Customer's environment where queries and API calls are performed against Trellix products. The collected data is then encrypted using 256-bit encryption as an output file and uploaded via secure SSL connection to the AWS Trellix server where it is processed and stored in the encrypted database.

AWS audits and certifies their environment on a regular basis by a third-party vendor. AWS is compliant with dozens of standards including NIST, ISO, SOC, CSA, PCI, GDPR, etc. The latest audit reports are available on the AWS website and can be found once logged into the AWS Console.



For additional details on AWS certifications, visit <https://aws.amazon.com/>.

- Search for “Artifact”
- Select Artifact from the search results
- Select View Reports from the AWS Artifact page

**Table 6. Personal Data Security**

Personal Data Category	Type of Personal Data	Security Controls and Measures
Administrative Data	See Table 1	Encrypted in transit and at rest
Generated Data	See Table 1	Encrypted in transit and at rest
Collected Data	See Table 1	Encrypted in transit and at rest

Additional details for product certifications are available upon request.

## Compliance with Privacy Requirements

Trellix is committed to protecting personal data processed in the global and regional DE-SaaS clouds. We will not access the content of files in a way in which we could learn meaningful information about natural persons, other than in exceptional cases where it is necessary for identifying security threats.

The Privacy Office and Trellix Legal provide risk and compliance management and consultation services to help drive security and regulatory compliance into the design of Trellix products and services. The Service is built with privacy in mind and is designed so that it can be used in a manner consistent with global privacy requirements.

Further, in addition to complying with our stringent internal standards, Trellix also maintains third-party validations to demonstrate our commitment to information security.

## Exercising Data Subject Rights

Users whose personal data is processed by the Service have the right to request access, rectification, suspension of processing, or deletion of the personal data processed by the Service.

We will confirm identification (typically with the email address associated with a Trellix account) before responding to the request. If we cannot comply with the request, we will provide an explanation. Please note, users whose employer is the Customer/Controller may be redirected to their employer for a response.

Requests can be made by submitting a request via:

- 1) the [Trellix Individual Data Request Form](#)
- 2) by postal mail:

**In the U.S. by registered mail:**

Musarubra US LLC

Attn: Legal Department –Privacy  
6000 Headquarters Drive, Suite 600

Plano, Texas, 75024

or call us at +1 (214) 494-9190

**In the European Economic Area by registered post:**

Musarubra Ireland Limited  
Attn: Legal Department –Privacy  
Building 2000, City Gate

Mahon, Cork, Ireland

or call us at +353 21 467 2000

**In Japan by registered mail:**

Musarubra Japan KK  
Attn: Legal Department –Privacy  
Shibuya Mark City West

1-12-1 Dogenzaka, Chibuyaku, Tokyo 150-0043

## **About This Privacy Data Sheet**

Trellix Privacy Data Sheets are reviewed and updated on an annual, or as needed, basis.

Please note that the information provided with this document concerning technical or professional subject matter is for general awareness only, may be subject to change, and does not constitute legal or professional advice, warranty of fitness for a particular purpose, or compliance with applicable laws.