

## Trellix Thrive

The purpose of this Privacy Data Sheet is to provide Customers of Trellix Thrive 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 Thrive is a solution which supports Trellix Customers for resolution of technical problems as well as provides educational resources made available by Trellix to companies or persons who obtain a Trellix Thrive subscription.

Trellix will process personal data from Trellix Thrive 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 Trellix Thrive to provide its functionality.

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

## Product Overview

The Trellix Thrive service platform provides a simple and modern experience for support, education, and professional services. Trellix Thrive offers three different packages to ensure you get the level of support and security optimization your organization needs, which include Trellix Thrive Essential, Trellix Thrive Advanced, and/or Trellix Thrive Elite. Trellix Thrive Essential is included at no cost with every subscription software purchase to support and optimize your Trellix technology investment.

To get more value from your solutions and mature your security program, invest in Trellix Thrive Advanced or Trellix Thrive Elite, which offer Flex Credits that can be applied to premium support, options for custom training and access to Trellix cyber experts for professional services engagements.

### **Trellix Thrive includes the following options and security features:**

- **Thrive Essential:**
  - Services Portal, Online Resources

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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.”

- Severity Level Objective (SLO) (S1 &S2 / S3 / S4) - 60m, 12h, 1d
- 24x7x365 Phone Support - Severity 1 only
- Digital, Self-Guided Training
- Flex Credits for Custom Education Services, Consulting Services and Intel Services - for Purchase
- **Thrive Advanced:**
  - Services Portal, Online Resources
  - SLO (S1 &S2 / S3 / S4) - 30m, 8h, 1d
  - 24x7x365 Phone Support
  - Live Chat, Email Case Submission
  - Advanced Case Routing - Severity 1 only
  - Case Prioritization - Over Essential
  - Digital, Self-Guided Training
  - Flex Credits for Customer Educational Services, Consulting Services, and Intel Services
- **Thrive Elite:**
  - Services Portal, Online Resources
  - SLO (S1 &S2 / S3 / S4) - 15m, 4h, 8h
  - 24x7x365 Phone Support
  - Live Chat, Email Case Submission
  - Advanced Case Routing - Over Advanced
  - Digital, Self-Guided Training
  - Flex Credits for Customer Educational Services, Consulting Services, and Intel Services
  - Flex Credits for Premium Services

## Personal Data Processing

Through the Trellix Thrive service platform, Customers can seamlessly navigate a range of offerings, from technical assistance and troubleshooting to in-depth training modules and expert-led consultations. This integrated approach ensures that Customers have quick and efficient access to the tools and knowledge they need to optimize their security posture and maximize the value of their Trellix solutions.

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

**Table 1. Personal Data Processed by Trellix Thrive**

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>● First Name</li> <li>● Last Name</li> <li>● Title</li> <li>● Permission Level</li> <li>● Email</li> </ul>	<ul style="list-style-type: none"> <li>● Activation/Deactivation of User</li> <li>● Authentication/Authorization</li> </ul>

	<ul style="list-style-type: none"> <li>• User Type</li> </ul> <u>Contact Information:</u> <ul style="list-style-type: none"> <li>• First Name</li> <li>• Last Name</li> <li>• Email</li> <li>• Phone Number</li> <li>• Permission Level</li> </ul> <u>Company Information:</u> <ul style="list-style-type: none"> <li>• Company Name</li> </ul>	
Generated Data	<u>Phone Support Data:</u> <ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Company Account Name</li> <li>• Description of Problem</li> </ul> <u>Chat Support Data:</u> <ul style="list-style-type: none"> <li>• Chat Transcript</li> </ul> <u>Case Submission Data:</u> <ul style="list-style-type: none"> <li>• Description of Problem</li> <li>• Contact Information</li> <li>• Account Information</li> <li>• Attachment File Name</li> <li>• Attachment Contents</li> </ul> <u>Support Case File (attachments):</u> <ul style="list-style-type: none"> <li>• Attachment File Name</li> <li>• Attachment Contents</li> </ul> <u>Email Submission Data:</u> <ul style="list-style-type: none"> <li>• Contact Information</li> <li>• Description of Problem</li> <li>• Attachment File Name</li> <li>• Attachment Contents</li> <li>• Activities</li> <li>• Emails</li> </ul>	<ul style="list-style-type: none"> <li>• Support</li> </ul>
Collected Data	<ul style="list-style-type: none"> <li>• Login History</li> <li>• Trace Logs</li> </ul>	<ul style="list-style-type: none"> <li>• Support</li> </ul>

**\*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. Trellix Thrive processes the personal data in Salesforce, Google, and Trellix’s instance in Amazon

Web Services, Inc., (AWS) datacenters located in the United States. Trellix’s regional clouds provide options to address Customers’ data location preference. 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
Salesforce	United States (N. Virginia)
Salesforce (OWN)	United States
Google Cloud	United States
AWS	United States (Oregon)

## Subprocessors

Trellix partners with service providers that act as subprocessors for the Trellix Thrive 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
Salesforce	See Table 1.	Hosting	See Table 2.
Salesforce (OWN)	Administrative / Generated Data	Data Backup	See Table 2.
Google Cloud	Administrative / Generated Data	Hosting	See Table 2.
AWS	See Table 1.	Hosting	See Table 2.
OKTA	Administrative Data	Authentication	See Table 2.

## 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.

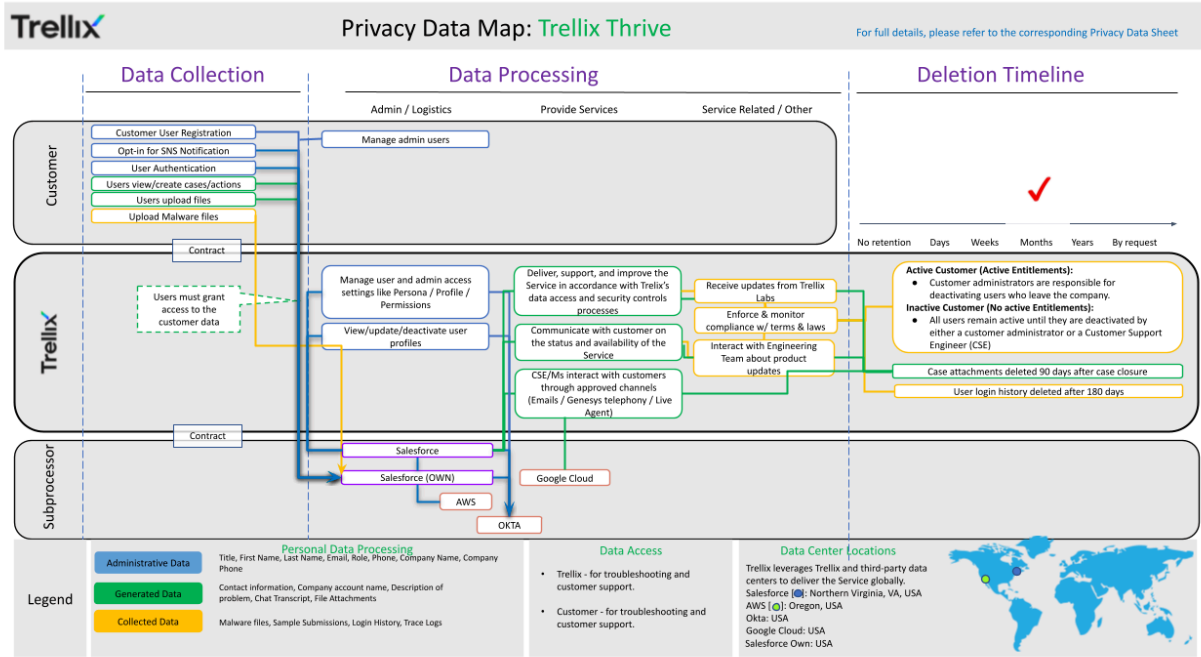
The table below lists the personal data used by Trellix Thrive to carry out the service, who can access that data, and why.

**Table 4. Access Control**

Personal Data Category	Who has access	Purpose of the access
Administrative Data	Customer	Enable Thrive for troubleshooting and customer service.
	Trellix	Manage Thrive for troubleshooting and customer service.
Generated Data	Customer	Troubleshooting and Customer Support.
	Trellix	Troubleshooting and Customer Support.
Collected Data	Customer	Troubleshooting and Customer Support.
	Trellix	Troubleshooting and Customer Support.

## Trellix Thrive 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 and services 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.

## Data Portability

Except with respect to Registration Information, the Customer can forward the personal data processed by Thrive 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 Thrive, 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 [thrive-case@mail.thrive.trellix.com](mailto:thrive-case@mail.thrive.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). Trellix support can also be reached at [newcase@mail.thrive.trellix.com](mailto:newcase@mail.thrive.trellix.com) to open a new case.

**Table 5. Data Retention**

Personal Data Category	Retention Period	Reason for Retention
Administrative Data	Retained until the subscription service ends.	Troubleshoot Customer support cases.
Generated Data - Case Attachments	90 days after case closure.	Access to support services.
Collected Data - Login History	180 days.	Troubleshoot Customer support cases.

**\*\*Please also note that, for active Customers (Active Entitlements), Customer security operations administrators are responsible for deactivating users.**

**For inactive Customers (No Active Entitlements), all users remain active until they are deactivated by either a Customer security operations administrator or a Customer Support Engineer (CSE).**

## 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 Thrive 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 Trellix Thrive 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

2611 Internet Blvd, Suite 200,

Frisco, TX 75034

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, Shibuya-ku, 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.