



Trellix ePolicy Orchestrator SaaS (ePO - SaaS)

The purpose of this Privacy Data Sheet is to provide Customers of Trellix ePO - SaaS with details on how Trellix captures, processes, and stores¹ 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 ePO - 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, and is made available by Trellix to companies or persons who obtain a Trellix ePO - SaaS subscription.

Trellix will process personal data from ePO - 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 the Trellix ePO - SaaS service to provide its functionality.

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

Product Overview

Trellix ePO - SaaS is a multi-tenant, globally scaled management service that runs in the cloud. Trellix manages the platform infrastructure, upgrades, and maintenance and makes sure that Trellix ePO - SaaS is always up to date. This eliminates the need for maintenance of on-premises security infrastructure, enabling the Customer's security professional to focus exclusively on security. Customers can simply access the platform from a browser with their credentials and manage their security.

Trellix ePO - SaaS serves as the command center for data security and management across the Customer's entire enterprise by introducing an integrated single pane view for automated and proactive policy management and enforcement.

¹ 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."

Customers use the Trellix ePO – SaaS console to gain critical visibility of enterprise security across all vectors—file, web, message, and network, and to enable action across the full spectrum of new and emerging threats in real-time, from anywhere.

As the organization's command center, Customers use ePO -SaaS to access managed clients, networks, data, and compliance solutions to protect their networks.

Trellix ePO - SaaS integrates with global and regional clouds and can be managed 24/7 by a team of Trellix security experts. Trellix ePO – SaaS removes the setup and maintenance of security infrastructure, allowing the Customer to focus exclusively on monitoring and proactively addressing emerging threats on all enterprise devices.

Trellix ePO-SaaS solution manages data generated by other Trellix products and services, including:

- Trellix Endpoint Security (ENS) (Includes Adaptive Threat Protection (ATP))
- Trellix Endpoint (for Windows 10 only)
- Trellix Insights
- Data Loss Prevention (DLP)
- Threat Intelligence Exchange (TIE)
- Trellix Management of Native Encryption (MNE)
- Skyhigh Client Proxy (SCP)

Trellix ePO - SaaS works in tandem with other Trellix security products and/or services to stop malware attacks and to notify Customers when an attack occurs. Updates to the platform are automatic, continuous and transparent. Proactive device security is deployed across the entire enterprise, eliminating manual efforts to install or update security for each device which assures stronger enforcement against malware, including known and unknown threats.

Products and/or services within the Customer's environment that integrate with ePO-SaaS leverage Trellix Agent for threat event generation and policy management, then send security and product and/or system information to Trellix's ePO-SaaS instance in AWS (Amazon Web Services).

The Trellix ePO - SaaS solution allows Customers to perform network and client tasks, including:

- Managing and enforcing network and endpoint security using policy assignments and client tasks;
- Monitoring the health of the Customer's network;
- Capturing data on events and alerts;
- Creating reports using the query system builder, which displays configurable charts and tables of the Customer's network security data;
- Automating product deployments, patch installations, and security updates.

With ePO - SaaS, the Customer's ePO-SaaS Administrator (ePO Admin) can:

- Grant user access to specific groups of systems or give administrators full control;
- Install an open framework that unifies security management for systems, applications, networks, data, and compliance solutions;
- Unify security management across endpoints, networks, data, and compliance solutions from Trellix and third-party solutions;

- Define how Trellix ePO SaaS software directs alerts and security responses based on the type and criticality of security events in the Customer's environment.

ePO - SaaS can be implemented as one of two deployments:

- **Standalone implementation:** In standalone deployments, the ePO-SaaS solution reads data stored on the Customer's enterprise systems and no data is ever captured by Trellix.
- **Managed implementation:** Trellix ePolicy Orchestrator SaaS (ePO-SaaS) deployment, Customers use tenant credentials (Trellix Agent) 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 systems within their organization.

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

Personal Data Processing

The ePO - SaaS solution works in tandem with other Trellix security products and/or services and offers the Customer's ePO SaaS administrator (ePO Admin) the ability to set enterprise policies and configurations to send tasks to the Customer's enterprise endpoint systems.

Trellix Agent enables communication between the Customer's enterprise endpoints and the ePO – SaaS service by way of Web API, which allows access to data via scripting. ePO – SaaS then processes and stores data generated by Customer enterprise endpoints in Trellix's ePO – SaaS instance in AWS.

Trellix ePO Admins require independent logins for authentication. At the sole discretion of the ePO Admin, ePO - SaaS offers functionality to automatically configure information captured from the Customer's enterprise endpoint system in an authorized on-premises Active Directory. This functionality is commonly used to reduce management tasks required for the ePO Admin such as managing the System Tree or managing product policies by user group.

The event data and system properties can contain elements of personal data relevant to endpoint security and management. For example, if a threat is detected on the endpoint, the threat event may contain the IP address of the system, and/or the logged-on username. In addition, system properties may contain personal data such as machine names, agent GUIDs, and IP addresses.

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

Table 1. Personal Data Processed by Trellix ePolicy Orchestrator - SaaS

Personal Data Category*	Types of Personal Data Processed	Purpose of Processing
Administrative Data	<u>General identification information:</u> • Name • Email address	Used to manage business operations ensuring compliance,

	• Company address • Contact details • Display name • Email address • Contact phone number if two-factor authentication enabled • Machine name • Mac address • IP address • Username • Active Directory username	provide reporting, and facilitate troubleshooting.
Generated Data	<u>Incidents / Events:</u> • Threat details ○ Location ○ Action Taken ○ URL ○ URL with search strings <u>Evidence:</u> • File • File Name • File Location	Used for system management, threat investigation and audit logging.
Collected Data	<u>Configuration Information:</u> • Active Directory	Used for system policy management and threat investigation.

* The Personal Data Categories used in this, and other Trellix Privacy Data Sheets are:

- **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. ePO-SaaS processes the personal data in Trellix's instance in AWS regional clouds located in the United States, Germany, Australia, Singapore, 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
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AWS	AWS West (Oregon)
AWS	Germany (Frankfurt)
AWS	Australia (Sydney)
AWS	Singapore
AWS	India (Mumbai)
AWS	Canada (Calgary)

Subprocessors

Trellix partners with service providers that act as subprocessors for the ePO-SaaS service and contracts to provide the same level of data protection and information security that Customers 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	Singapore
AWS	See Table 1	Data Center	India (Mumbai)
AWS	See Table 1	Data Center	Canada (Calgary)
OKTA	See Table 1	Authentication	AWS West (Oregon)

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 by 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.

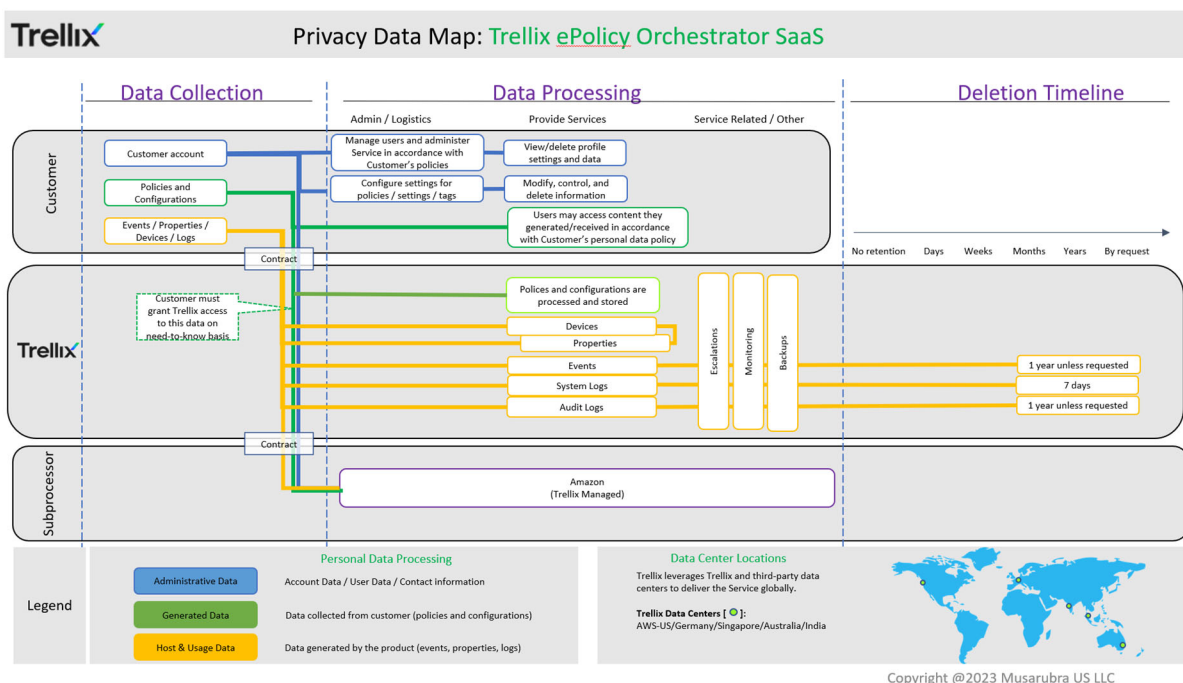
The table below lists the personal data used by ePO-SaaS to carry out the service, who can access that data, and why.

Table 4. Access Control

Personal Data Category	Who has access	Purpose of the access
Administrative Data	Customer	Analysis of User/Systems suspected of malware detection/detonation and cleanup or quarantine of the same. Also, to provide data on suspected violations of policy, compliance, and reporting.
	Trellix	Debugging of Customer/operational data in the event of an escalation.
Generated Data (Incidents / Events)	Customer	Analysis of User/Systems involved in violations, compliance, and reporting.
	Trellix	Debugging of Customer/operational data in the event of an escalation.
Generated Data (Evidence)	Customer	Associate evidence of a reported violation.
	Trellix	No access.
Collected Data	Customer	Leverage user groups in AD to define end-user permissions. S3 provides customer-controlled storage for evidence.
	Trellix	Give functionality to apply policies.

Trellix ePolicy Orchestrator SaaS (ePO 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 Trellix ePO - 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 personal data processed by Trellix ePO-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., if the 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 ePO-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	12 months	Compliance, reporting.
Collected Data	Retained until the Customer deletes or until the subscription service ends.	System integrations.

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.

ePO - SaaS uses a secure portal hosted by AWS to store Customer information. 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 certification are available upon request.

Compliance with Privacy Requirements

Trellix is committed to protecting personal data processed in global and regional 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 Trellix 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. ePO-SaaS 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 may 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.

Where Trellix is a Data Processor, users may be redirected to the Data Controller (e.g., the user's employer) or other organization for an appropriate 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 Data Sheet

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

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