

General Data Protection Regulations (GDPR) Statement Policy for the return of Customer Furnished Equipment (CFE)

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GDPR Handling Procedure version 1.0

Contents

- ▶ [Scope](#)
- ▶ [Assumption](#)
- ▶ [Procedure for receiving CFE](#)
- ▶ [Handling CFE](#)
- ▶ [Returning CFE](#)
- ▶ [Appendix 1](#)

Scope

This document covers the general Corporate products procedures in place for the handling of Customer Furnished Equipment (CFE) at McAfee.

The following types of CFE handled at McAfee:

- Laptop, Desktop systems & accessories
- HDD & SSD
- Appliances:
 - McAfee Email Gateway
 - McAfee Web Gateway
 - McAfee Data Loss Prevention (DLP)
 - McAfee Enterprise Security Manager (SIEM)

Individual McAfee engineering groups or product teams may develop their own local policy based upon this standard policy in order to adjust the general process to reflect requirements or constraints of a particular McAfee site.

Assumption

McAfee will not be responsible for ascertaining whether a system contains PII data or not. It is customer responsibility for notifying McAfee whether the CFE they provide contains PII data or not.

Procedure for receiving CFE

When CFE is received from a customer the following procedure shall be followed:

Procedure	Notes
1. Open packaging and examine contents against the shipping manifest.	Any damage to or missing items should be reported immediately.
2. Ensure that a record is kept linking the shipping manifest and the corresponding Support case, utilizing a unique identifier, hereafter referred to as CFE-ID, that is assigned to the CFE so that it can be identified and tracked.	Note, all items received are assigned the same CFE-ID and should be stored/kept together. Please refer to Appendix 1 for an example of the type of information that may need to be recorded.
3. Ensure that the CFE is appropriately labelled with the unique tracking identifier (CFE-ID).	
4. Ensure that all CFE belong to the same customer request are kept together.	
5. Secure all CFE in access controlled room or lab.	

Handling CFE

The following procedure must be followed when engineer begin to work on CFE:

Procedure	Notes
1. Assigned engineer has clearance to work on CFE in the access controlled lab.	Engineer that have no clearance to the access controlled area will need to apply for access, which requires approval.
2. The name of the assigned engineer responsible for the CFE investigation shall be recorded.	
3. CFE must be stored in an access controlled area and must not be removed from access controlled area if customer advises that it holds PII unless a formal exception has been granted.	
4. If the CFE is worked on outside the access controlled area, the assigned engineer is responsible for returning the system to its secure storage in the access controlled area at the end end of the working day.	

Returning CFE

When CFE needs to be returned to the Customer, the following procedure must be followed:

Procedure	Notes
1. Inform relevant contact about the shipment and requesting confirmation of shipping address.	
2. Check the original manifest and collect all items of CFE and ready for shipment.	
3. Repack the CFE and accessories securely in the original packaging.	Where original packing is damaged it will be replaced with equivalent packaging.
4. Book a collection for the packaging with approved courier company.	
5. Record that the CFE has been returned once the shipment has been collected, noting the shipment tracking number provided by the courier	
6. Send the tracking number provided by the courier to the recipient, informing them that the equipment is being returned.	

Appendix 1

The record contain the following information:

- a. Customer name
- b. Reference number
- c. BZ & SR reference number
- d. Date received
- e. Device manufacturer
- f. Device model number
- g. Device Serial number
- h. Whether the following accessories were supplied:
 - i. Power supply
 - ii. Keyboard
 - iii. Mouse
 - iv. Docking station
 - v. Other
- i. Whether CFE contains PII, as notified by customer
- j. Retention policy – is the machine to be returned to customer as soon as possible, or retained by McAfee for a defined period.

Any other relevant details.

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