

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

McAfee Germany, GmbH

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GDPR Handling Procedure version 1.0

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Scope

This document covers the procedures in place for the handling of Web Gateway Customer Furnished Equipment (CFE) at the McAfee Germany GmbH.

Note that all Customer Furnished Equipment will either be purchased and kept or return to manufacturing for rework. Customer would have received replacement unit when engineering receive an RMA system.

Please refer to McAfee_GDPR_Product_Statement_Hardware>Returns for RMA system.

In general, the following types of CFE are handled at McAfee Germany GmbH:

- WBG-5500-D, WBG-5000-D, WBG-4500-D,
- WBG-5500-C, WBG-5000-C, WBG-4500-C,
- WBG-5500-B, WBG-5000-B, WBG-4500-B, WBG-4000-B

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

McAfee will not accept CFE on a permanent basis; all CFE will be returned to the customer either as soon as the issue to which it relates is resolved or by an agreed date.

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

Procedure	Notes
1. Open packaging and check all contents against the shipping manifest.	Any damage to or missing items should be reported immediately to the shipping company and the customer.
2. Check that record on the tracking system match CFE received.	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. Check CFE label to ensure all requested information is written on it.	Requested information is clearly written and labelled.
4. Ensure that all CFE belong to the same customer request are kept together.	All CFE belong to the same customer request are kept together.
5. Secure all CFE in access controlled lab. a. All HDD/SSD removed from appliance unit must be stored in allocated drawer in the lab. b. Appliances to be stored in the lab.	All CFE are kept in access controlled 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 access.
2. The name of the assigned engineer responsible for the CFE investigation shall be registered to the tracking system.	Name of assigned engineer should be kept up to date on the tracking system.
3. CFE must be stored in an access controlled area and must not be removed from access controlled area unless a formal exception has been granted.	
4. In exception event should the system being removed from the access controlled area, the assigned engineer is responsible for: a. Keeping CFE location up to date on the tracking system. b. Returning the system to its secure storage in the access controlled area as well as update tracking system at the end end of the working day.	CFE containing PII data <u>must not</u> under any circumstances be left outside of the access controlled lab overnight. It is acceptable to leave CFE which does not contain PII data outside of the access controlled area lab overnight. No CFE may leave the premises unless being shipped back to the customer.

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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