

DELL TELEMETRY DATA NOTICE

Date: September 1, 2025

This Telemetry Data Collection Notice ("Notice") explains how the Dell entity identified on your order and our affiliated companies ("Dell", "we", or "our") and other third parties acting on our behalf collect, process, use, protect, and share ("process") Telemetry Data. Third party software and services installed on or included in Dell Solutions may generate and transmit telemetry data to parties other than Dell. Such third party telemetry is not covered by this Notice.

Understanding Telemetry Data

"Telemetry Data" is usage, diagnostics, configurations, and performance information collected and transmitted to Dell or to a third party acting on behalf of Dell about how you use, access, or interact with Dell hardware or software (including firmware) products and service offerings (each a "Dell Solution") that you use, as well as the performance, operation, or status of a Dell Solution.

It may include system information related to your device, system, or network (such as your device's unique Dell Service Tag and your IP address, hardware model, operating system version, hardware settings, installed Dell Solution, system and application configuration data, browser language, and MAC address or other device identifier), device and sytem event information (such as system crash data), and how your device, system, or network interacts with a Dell Solution (such as statistical information, network connection indicators, routing), other technical data, and timestamps associated with all of the above.

Although Telemetry Data may include certain data in logs you enable and may reflect your configuration choices, it does not include any content you add to a Dell Solution.

Some of the types of information collected in the context of the Telemetry Data operations described in this Notice (such as IP address and certain device identifiers and operating system details) may also be collected in other contexts, such as via cookies and other technologies on the public-facing pages of our website. Your choices about whether to enable Telemetry Data in the contexts described in this Notice do not affect the collection of similar information in those other contexts, and vice versa.

How do we collect Telemetry Data?

When Telemetry Data collection is enabled, Dell automatically collects and, once an internet connection is established, transmits Telemetry Data to Dell as part of normal Dell Solution performance.

How do we use Telemetry Data?

Dell may use Telemetry Data for one or more of the following purposes (together, the "Purpose"):

a. To support or carry out our provision of Dell Solutions to you.

- b. To verify compliance and monitor services and infrastructure performance to ensure the integrity, stability, and security of Dell Solutions, or to exercise or fulfill Dell's legal rights and obligations with respect to Dell Solutions.
- c. To provide Dell and its customers with visibility to the customer's actual usage and consumption patterns of the Dell Solution, and to bill customers using Telemetry Data when applicable (in each case in a manner consistent with and detailed in Dell's terms and conditions and service description for the applicable Dell Solution).
- d. To perform predictive analytics, diagnostics, competitive swap outs, or health checks, or to derive usage intelligence to consult with and assist customers in optimizing future planning activities and requirements. For instance, Dell may use Telemetry Data for account planning exercises around product shift or product expansion/upgrades.
- e. In de-identified and aggregated form, to develop and improve Dell Solutions or for marketing research, sales, and analyzing customer interests, behavior, location (by city, state, region or country, but excluding precise geolocation) and preferences to help better understand customers, improve Dell Solutions and enhance customer experience.
- f. Additional uses as described in our agreements or service descriptions and (to the extent applicable as described in the section below), the Dell Privacy Statement.

Does Dell share Telemetry Data?

Any transfer of Telemetry Data to third parties will be consistent with the Purpose and applicable laws, and subject to protections appropriate for confidential customer information.

Is Telemetry Data personal data?

While generally Telemetry Data may not directly identify a specific individual, it may be considered personal data under applicable privacy and data protection laws, as it may include certain unique identifier(s) and other information that uniquely identifies an individual's device or system. We may also associate an individual user's Telemetry Data with the applicable Dell account and other data linked to that account.

Where Telemetry Data constitutes or contains personal data, Dell's legal basis for processing such personal data will depend on applicable privacy and data protection laws, the specific context in which Dell collected it, and the purpose for which it will be used. Dell may only process Telemetry Data that constitutes or contains personal data where Dell needs the personal data to perform a contract, comply with laws and regulations, or where the processing is in Dell's legitimate business interests (except where such interests are overridden by the individual's interests or fundamental rights and freedoms that require protection of personal data).

Where Telemetry Data constitutes or contains personal data, Dell shall process such Telemetry Data in accordance with the applicable jurisdiction's Dell Privacy Statement, which can be accessed at http://www.dell.com/localprivacy, or the applicable Data Processing Addendum for enterprise customers.

Data Retention

Dell will retain your Telemetry Data as necessary in connection with the Purpose, and in accordance with Dell's retention policies and applicable law.

Unless prohibited by applicable law, Dell will exclusively own and retain all rights in Telemetry Data that is anonymized, i.e. that neither identifies nor can be feasibly used to identify an individual or customer.

The most current version of this Notice is available at <u>Dell.com/telemetry</u>. Local copies may become outdated.