

Hewlett-Packard Faces the Challenge of Global Training

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Hewlett-Packard, a global provider of computer products and technologies, has to deal with the mammoth task of ensuring that its staff has sufficient data protection knowledge to comply with a multitude of global privacy laws. Due to the merger with Compaq Computer Corp. in 2002, the company now has 140,000 staff worldwide. For an organization that operates in 160 countries, it is of paramount importance that staff training is consistent and that there are no regional differences.

Daniel Pradelles, Hewlett-Packard's customer privacy manager for Europe, Middle East, and Africa, explained to *Privacy Laws & Business International* that the company expects its entire staff to have a basic understanding of the most important privacy principles. Consequently, these principles are at the heart of the company's privacy training. The company offers three fundamental training programs. "Standards of Business Conduct" is mandatory for all existing and new staff. "Respecting Privacy at Hewlett-Packard" is offered in two versions. The first version is mandatory for all staff who handle customer data, while the second has to be attended by all staff handling employee data. This is a

minimum of two to three hours of training, which is followed by additional privacy training tailored to specific job functions and offered for staff that routinely deal with personal data.

The Basic Rules for All

The fundamental privacy principles that are explained during basic training are awareness, choice, access and accuracy, security, and control. Pradelles emphasizes the importance of every employee's familiarity with the fundamental privacy principles.

"These five privacy fundamentals should be known by heart by any employee who collects, handles, or accesses personal data," he says, "with the ultimate objective to create a so-called 'privacy-conscious culture' in the company."

By awareness, Hewlett-Packard means that it is essential to tell data subjects, whether they are employees or customers, what type of personal data is being collected, whether it is stored, and how it is shared with third parties. One of the best ways of getting this message through to customers is via the company's online privacy policy.

"The purpose limitation principle also needs to be explained during the basic training," stresses Pradelles. "Staff need to understand that personal data may be collected only for

legitimate purposes and in an amount which is not excessive according to the stated purpose."

After awareness, explains Pradelles, is the concept of choice. This refers to the customer's choice over how much personal data the company is provided with, the choice over whether or not a person agrees to share data with third parties, and so on.

"As a rule, Hewlett-Packard does not share customer data with third parties, but when we do, it is done only with the data subject's consent. The company also gives data subjects the choice to decide whether or not they want to be contacted by e-mail. Unsolicited mail, whether generated by Hewlett-Packard or not, is by far the most common customer complaint that the company receives.

"The company took the decision to require opt-in for e-mail in all our business units worldwide. In fact, this rule provides a higher level of protection than is required in some countries."

The principles of access and accuracy are also featured in Hewlett-Packard's basic training program. The company makes sure that its customers and employees know that they have the right to access personal data held on them. The concept of subject access (by employees or customers) is also explained to Hewlett-Packard

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staff, as well as details on how to respond to these access requests.

The principle of security includes topics such as additional protection for sensitive data and good business management processes to prevent unauthorized access and use of personal information. Staff also learn, in basic terms, how the company uses encryption to ensure a secure transfer of sensitive personal data.

"Lastly," says Pradelles, "we at Hewlett-Packard believe in feedback. We must provide our customers with a channel through which they can have their concerns heard and questions answered. We have set up a specific e-mail address, privacy@hp.com, which customers can use to contact us if they have any concerns over their privacy."

Training According to Specific Needs

Hewlett-Packard collects a variety of personal data. Data is received from individuals as they order products and services, apply for credit, subscribe to marketing materials, register for products, and apply for, or accept, a job at Hewlett-Packard. Typically, the personal data collected includes name, address, phone number, e-mail address, user ID-passwords, and billing and transaction information. Personalized marketing, based on professional interests, demographics, and experiences with Hewlett-Packard's products or services is carried out only for those who have proactively agreed to provide that information.

Understandably, a Hewlett-Packard employee who deals with financial or other sensitive data needs to be more aware of data protection rules than someone who seldom comes across personal data as part of their daily work routine. The company organizes specific data protection training for employees working in marketing, call centers, and in Web design. The company also ensures that any third-party contractors are trained according to its standards.

A Mix of Different Methods

"Hewlett-Packard uses a variety of different training methods depending on the audience," explains Pradelles.

"While computer-based training is widely used, training seminars and workshops are used for more specific training. We organize a bimonthly Privacy Expert Seminar, which is intended to 'feel the privacy trends,' and share experience and views. This one-day seminar typically features external speakers from the worldwide privacy community, major businesses, and consulting companies. The basic training is also supported by an intranet Web and an internal e-mail system, whereby employees can address any concerns they may have."

The company has three main Web sites with links between them. In addition to the corporate privacy office's Web site, the company has Web sites for the customer privacy team and the employee privacy team. These Web sites include reference materials, guidelines, policies, slide sets, and tools to design new programs and applications or assess existing ones. Staff can also always contact the privacy teams directly by phone.

Training Mainly In-House

Most of the training is delivered by the company's own privacy team, which is spread around the world. As customer privacy manager for Europe, Middle East, and Africa, Pradelles is based in France and has a counterpart based in Germany, who is responsible for employee privacy.

In the United States, there are three privacy teams that concentrate on different areas (the chief privacy officer is based in California, the worldwide customer privacy officer is based in Texas, and the worldwide employee privacy officer in Colorado). Australia has its own customer/employee privacy officer.

"As you can see, we are a truly international team, remote from each other, but very well and tightly coordinated," says Pradelles. "The main form of communication between the teams is e-mail and weekly teleconferences."

"The reason why we have divided privacy implementation between customer and employee privacy is that even when the concepts and laws are the same, the actual implementation, scope, systems architecture, audience, data subject groups, and complexity are quite different," he continues.

Follow-Up Forms Part of Training

Asked whether the company evaluates how well the training has been received, Pradelles explains that at the end of a training course, participants fill in an evaluation form that is used for feedback. The company does not currently test staff on their data protection knowledge but is in the process of developing a survey and self-auditing practices that will address this point.

As maintaining data protection awareness is just as important as formal training, the company has set up an extensive network of "privacy champions" and "advocates."

"In a large, complex, and diverse company dealing with so many different countries, legal systems, cultures, and sensitivities, there is a real challenge to maintain consistency and ensure flexibility and timely adaptation to business constraints," says Pradelles. "To reach these goals, Hewlett-Packard has set up flexible and efficient links between the business organizations in the field, and us, the privacy team. The privacy champions are managers who work at the worldwide and regional level. They support the implementation of our privacy programs. The so-called advocates, who are privacy knowledgeable people working in the main business units (marketing, call centers, HR, finance, e-business), spread the word about privacy at the operational level. These are the people who make it real for the rest of the staff."

"In addition to all this, Web sites, our monthly internal "privacy newsletter" with privacy news, tips, and advice about best practice are also a powerful way to maintain awareness," sums up Pradelles. ■

About the author

Laura Linkomies is a contributing editor to *Privacy Laws & Business International*. This article originally appeared in its May/June issue and is reprinted with permission. *Privacy Laws & Business* provides data protection consultancy services, privacy audits, in-house training, and conferences. For more information, visit www.privacylaws.com.