

How Palo Alto Networks responds to government and law enforcement agency requests to access personal data

At Palo Alto Networks, the privacy and security of our customers and partners are our top priority. We recognize that certain customers and certain industries will have varying levels of interest in and/or concerns pertaining to government requests for personal data. As a result, we are committed to providing a greater level of transparency around how we handle such requests.

If a law enforcement, national security, or other government agency sends Palo Alto Networks a request (warrant, court order, or subpoena) to access personal data of our customers, we commit to the following process:

- Palo Alto Networks will work to redirect the agency to request that personal data directly from the relevant customer. In doing so, Palo Alto Networks may provide such customer's contact information to the requesting agency.
- If efforts to redirect prove unsuccessful or there are compelling reasons why such redirection could not occur, we will carefully evaluate and review the scope, legal process, and applicable legal authority of such request. If we determine the request to be unlawful, overly broad, or infringing on the fundamental rights and freedoms of individuals, we will challenge and/or reject such request.
- Unless we are legally prohibited from doing so, we will notify all customers whose personal data is requested of such requests before disclosing their personal data so that all parties are aware of the requests and can take any necessary steps.
- We will only disclose personal data if we are legally required to do so. We will interpret these
 requests narrowly and provide only the information that is specifically requested to comply
 with the order.
- If compelled to disclose personal data to a requesting agency, Palo Alto Networks will give the relevant customer reasonable advance notice of the request, where law and circumstances allow, to allow such customer to seek any available legal remedies. The notification will include information about the personal data request, the requesting agency, the legal basis for the request, and the response provided by Palo Alto Networks.
- Where compliance with a valid government request would put Palo Alto Networks in potential breach of data protection laws in another country that has jurisdiction or authority over the personal data, Palo Alto Networks will challenge the demand and invoke mutual legal assistance mechanisms, where appropriate.
- Palo Alto Networks will only make an exception to the process described above in emergency circumstances where, in Palo Alto Networks sole discretion, following this process could result in danger or harm to an individual or group.