



GDPR PRIVACY NOTICE

Last updated and effective date: December 1, 2023

Aras is committed to safeguarding the privacy of Personal Data. This GDPR Privacy Notice (“**Privacy Notice**”) provides additional information about how Aras Corporation and its subsidiaries and affiliated companies (“**Aras**,” “**we**” or “**us**”) handle Personal Data that is subject to the GDPR when we are the controller of that information. In this Privacy Notice, we use the term “**GDPR**” to include the **EU General Data Protection Regulation**, as well as associated national laws, including the laws applicable to Switzerland and the United Kingdom (herein collectively referred to as “**EU Data Privacy Laws**”). **We strongly encourage you to read this Privacy Notice in its entirety.**

This Privacy Notice explains how Aras handles the Personal Data we collection from individuals through the Site, the Personal Data we collect when individuals engage with us or use our products or services (“**Services**”) and the Personal Data we receive about individuals as a result of providing the Services to third parties, whenever Personal Data is subject to the EU Data Privacy Laws. For all other Personal Data, our [Privacy Policy](#), applies to all users of our website (www.aras.com and associated pages) and related services (together, the “**Site**”), and explains our information practices related to the Personal Data that we collect from users of the Site.

For purposes of this Privacy Notice, “**Personal Data**” means any information relating to an identified or identifiable person subject to the EU Data Privacy Laws.

Aras Corporation is the data controller of Personal Data subject to the EU Data Privacy Laws that we collect and process in connection with the Services. Please note that depending on which Aras entity you engage with in relation to the Services, an Aras affiliate may also be a data controller responsible for processing your Personal Data in relation to the Services.

Personal Data we may collect

We may collect Personal Data in the course of our business, including through your use of our Site, when you contact us or request information from us, or when you engage our Services. When we require Personal Data from you in order to fulfill a statutory or contractual requirement, or where such information is necessary to enter into a contract or is otherwise an obligation, we will inform you and indicate the consequence of failing to do so.

The types of Personal Data we may collect about you may include the following:

- **Registrations, subscriptions, forms:** If you register with us via the Site, sign up to receive news and information from us, or communicate with us through or related to the Site, we may collect the following Personal Data:
 - Your name, job title and company
 - Contact information for you, including the company you work for and email address
 - Demographic information, such as your address, preferences, and interests
 - Other information relevant to the provision of Services
- **Mailing Lists:** For customers and prospective customers, we also collect information to enable us to market our Services, which may be of interest to you. For this purpose, we may collect:
 - Name and contact details
 - Other business information, such as job title and the company you work for
 - Areas of topics that interest you
 - Additional information may be collected, such as events you attend
- **Services:** From individuals who are customers and prospective customers, or are representatives of customers or prospective customers, we may collect the following Personal Data:
 - You name, name of the company you work for, and your job title
 - Contact information for you,
 - Information you provide to us for the purposes of attending meetings and events



- Information that you provide to us as part of the provision of Services
- Other information relevant to the provision of Services.

Sensitive Personal Information

Aras does not request or require sensitive Personal Data regarding religion, health, sexual orientation, or political affiliation in connection with our Services.

Information from other Third Parties

From time to time, we may obtain information about you from public sources or third parties as described in the Privacy Policy.

Profiling and automated decision making

Aras does not use Personal Data for automated decision-making, including profiling.

With Whom will Aras share Personal Data

We take care to share your Personal Data only with those who really need it in order to perform their tasks and duties, and third parties with a legitimate business need. We may disclose your Personal Data to the following types of third parties:

- Aras group companies. We may share Personal Data with our affiliates and subsidiaries worldwide for data processing or storage purposes, or as otherwise outlined in our Privacy Policy or this Privacy Notice.
- Third Party Service Providers. Aras contracts with business partners, suppliers, service providers, authorized third-party agents or contractors (“**Service Providers**”) in order to provide requested products, services, or transactions, including processing orders, hosting websites, hosting events and seminar registrations, and providing customer support. Aras may share Personal Data with its Service Providers (or allow them to collection information from or about you) to the extent needed to deliver the products or Services or respond to requests for information on products or Services or otherwise support your business needs or interests. In these instances, they may contact you directly regarding such products or services. We will only provide these Service Providers with the minimum amount of Personal Data necessary to complete the requested service or transaction and we require that they treat Personal Data consistent with the terms contained in this Privacy Notice. Unless otherwise dictated by law or agreement, Aras is not responsible for any improper use by such Service Providers.
- Distributors, Resellers and other Partners. We may share your Personal Data with distributors, resellers, channel partners and others in connection with the sale and marketing of products and services offered by Aras or on behalf of Aras with your prior permission or where otherwise permitted by applicable law.
- Administrative or Legal Reasons: We may share your Personal Data in response to a request for information if we believe disclosure is in accordance with any applicable law, regulation or legal process, if we believe your actions are inconsistent with the spirit or language of our agreements or policies, or to protect our rights, property and safety and the rights, property and safety of others, or as otherwise required or permitted by any applicable law, rule or regulation.

Aras will never sell, rent or lease your Personal Data to a third party.

How Aras uses Personal Data / Legal basis under which Aras processes your Personal Data

Our processing of Personal Data is justified by a “legal basis” that is, a specific condition. We may use Personal Data for the following purposes, in each case as justified by a legal basis:



- **Fulfillment of Services:** We use Personal Data to enable us to perform the Services, respond to your requests and deliver our Services, for which you have engaged us, provide training on our products and Services, verify your identity, and carry out requests made by you on the Site or in relation to our Services.
 - **Legal Basis:** This processing is necessary for our compliance with legal obligations. It is in our legitimate interest according to Article 6(1)(c) of the GDPR to use your Personal Data in such a way to ensure that we provide our services to our customers.
- **Business Administration:** We use Personal Data for the following business administration and legal compliance purposes:
 - To comply with our contractual obligations
 - To enforce our legal rights. To investigate and/or settle disputes
 - To comply with any applicable law, court order, other judicial process, law enforcement requests or the requirements of a regulator
 - To protect the rights, property or safety of us or third parties, including our customers and users of our Site or our Services
 - To maintain our business records
 - To process business transaction data
 - To use as otherwise required or permitted by law, consistent with these purposes.
 - **Legal Basis:** It is in our legitimate interest according to Article 6(1)(b) of the GDPR to use your Personal Data to comply with our contractual obligations or to enforce or defend our legal rights, or to protect the rights of third parties.
- **Customer Development:** We may use Personal Data in order to respond to Requests for Proposals (“RFPs”), prepare for any presentations and proposals, and identify potential business opportunities. This may include the collection and use of non-personal business information about current, former, and prospective business customers. However, we may process limited Personal Data about individuals (name, current and former company, current and former title, contact information and similar information).
 - **Legal Basis:** This processing is in our legitimate interest according to Article 6(1)(f) of the GDPR to use your Personal Data in order to develop and grow our business and Services. We may also process this information to respond to an RFP or a specific request in anticipation of a contract with you (i.e., engagement for Services).
- **Marketing and Promotions:** We may use Personal Data for marketing and promotional purposes, such as to send you newsletters, or to otherwise contact you about products or information we think may be of interest to you, by email and direct (postal) mail.
 - **Legal Basis:** It is in our legitimate interest according to Article 6(1)(f) of the GDPR to use your Personal Data for marketing purposes in order to develop and grow our business and Services. We will, where required by applicable law, obtain your explicit consent according to Article 6(1)(a) of the GDPR to send such communications.
- **Customer Insight and Analytics:** We may use Personal Data to better understand how you and others use our Services, so that we can improve our Site and Services, develop new features, tools, offerings, services, and the like, and for other research and analytical purpose. We also must the information we collect to measure the effectiveness of our online content and how visitors use our Site and our Services. This allows us to learn what pages our Site are most attractive to our visitors, which parts of our Site are the most interesting, and what kind of offers our registered users like to see. WE may use this information and the insights we have derived for marketing purposes, or to make decisions about events, new and information that may be of interest to customers, prospective customers, Site users and others.
 - **Legal Basis:** It is in our legitimate interest according to Article 6(1)(f) of the GDPR to use your Personal Data in such a way to ensure that we provide the very best Services to our customers and others in order to develop and grow our business and Services.
- **Legal Disputes:** Aras can use your Personal Data to deal with legal disputes and to establish, exercise and defend (potential) legal claims



- **Data Subject’s explicit consent:** We may seek your consent to process your Personal Data in specific circumstances or process it where necessary to comply with legal obligations or for purposes connected to legal claims.

If you have any questions about or need further information concerning the legal basis on which we collect and use your personal information, contact us at privacy@aras.com.

How long we keep your Personal Data

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which the Personal Data was collected as described in our Privacy Policy and this Privacy Notice. At the end of the applicable period, or once you withdraw your consent as described below, your Personal Data will be deleted in accordance with statutory provisions.

How do we protect your Personal Data

Aras uses appropriate technical, organizational, and administrative security measures to protect your Personal Data from loss, misuse, unauthorized access, disclosure, alteration, and destruction. These security measures are designed to provide a level of security appropriate for the risk of processing your Personal Data.

International Transfers

We may process your Personal Data in countries outside of the European Economic Areas (“EEA”), United Kingdom (“UK”) and Switzerland, to the US and other countries in the course of the administration of our contractual relationship with our customers, including providing professional services, support, and upgrade services. Our parent company, Aras Corporation, may host these servers or utilize third party service providers, but in either case we will be responsible for secure access to Personal Data.

In order to provide adequate protection of your personal information, we have in place contractual arrangements (where appropriate) with our group companies which cover these transfers and we will take all reasonable measures to safeguard your information whenever it is transferred. We will only transfer your Personal Data as permitted by law. Certain privacy and data protection laws require data controllers to put in place safeguards to protect personal information transferred across borders. To comply with this requirement, Aras has put in place agreements that include the standard contractual clauses recommended by the European Commission to provide adequate safeguards for personal information.

Transfers of Personal Data who are located in the European Economic Area, the United Kingdom and Switzerland to the US and other non-UK/EEA/Swiss jurisdictions (as applicable) will be made pursuant to appropriate safeguards, including:

- Ensuring that the Personal Data is transferred to countries recognized by the European Commission, the UK Secretary of State or under Swiss law (as applicable) as offering an equivalent level of protection; or
- Ensuring that such transfer is to a third party who uses appropriate safeguards in respect of the processing in question, including but not limited to the standard contractual clauses (including as amended in compliance with the requirements under UK and Swiss law), which are recognized as offering adequate protection for the rights and freedoms of data subjects, as determined by the European Commission, the UK Secretary of State or under Swiss law (as applicable).

We may transfer your Personal Data to, or store your Personal Data in, the following countries:

Country	Appropriate Safeguard
EEA (including Germany and Netherlands)	For transfers of UK/Swiss Personal Data, this jurisdiction is recognized as offering an equivalent level of protection by the UK Secretary of State and under Swiss Law
Japan	For transfers of EEA/UK Personal Data, this jurisdiction is recognized by the European Commission and the UK Secretary of State as offering an equivalent level of protection



Country	Appropriate Safeguard
	For transfers of Swiss Personal Data: Standard Contractual Clauses as amended in compliance with requirements under applicable Swiss law
United Kingdom	For transfers of EEA/Swiss Personal Data: this jurisdiction is recognized by the European Commission and under Swiss law as offering an equivalent level of protection
United States	For transfers of EEA Personal Data: Standard Contractual Clauses and/or transfers to recipients certified under the EU-U.S. Data Privacy Framework. For transfers of UK Personal Data: Standard Contractual Clauses as amended by the UK Addendum and/or as applicable, transfers to recipients certified under the UK Extension to the EU-U.S. Data Privacy Framework For transfers of Swiss Personal Data: Standard Contractual Clauses as amended in compliance with requirements under applicable Swiss Law and/or as applicable, transfers to recipients certified under the Swiss-U.S. Data Privacy Framework.

Security and Confidentiality

We maintain (and require our service providers) to maintain appropriate organizational and technical measures designed to protect the security and confidentiality of any Personal Data we process. If you have any questions on the security measures that we use to secure your Personal Data, you may contact us at privacy@aras.com.

Rights of Data Subjects in the EEA

In the European Economic Area and some other countries, you may have certain rights available to you under applicable data protection laws which may include the following rights:

- **Right to Access (Article 15 of the GDPR):** you have the right to request information about how we process your personal information and obtain a copy of that personal information. If permitted under applicable EU Data Privacy Laws, we may charge you a small fee for this service.
- **Right to Rectification (Article 16 of the GDPR):** you have the right to request the rectification of inaccurate personal information about you and for any incomplete personal information about you to be completed
- **Right to Object (Article 21 of the GDPR):** you have the right to object to the processing of your Personal Data which is based on our legitimate interests (as described above)
- **Right to Erasure (Article 17 of the GDPR):** you have the right to request the erasure of your Personal Data, under certain circumstances
- **Right regarding Automated decision-making (Article 22 of the GDPR):** you have the right not to have a decision made about you that is based solely on automated processing, including profiling if that decision produces legal effects about you or significantly affects you. Aras does not, as part of its recruitment process, make solely automated decisions about candidates.
- **Right to Restrict Processing (Article 18 of the GDPR):** you have the right to ask us to restrict our processing of your Personal Data under certain circumstances, so that we no longer process that information until the restriction is lifted.



- **Right to Data Portability (Article 20 of the GDPR):** you have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and to have that information transmitted to another controller in certain circumstances.

You retain the right to lodge a complaint with a supervisory authority in your country of residence if you believe that Aras has infringed your rights under applicable data protection legislation.

Your Rights

Depending upon the applicable data protection law in your country of residency, you may have the right to ask Aras for information relating to Personal Data about you we control and process; to correct, delete, or restrict any active processing of your personal information; and to obtain a copy of your personal information in a structured, machine readable format, as described above.

If Aras has collected and processed your Personal Data with your consent, then you can withdraw your consent at any time by contacting privacy@aras.com. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information on lawful processing grounds other than consent.

Upon receipt of a request from you, we may need to request additional information about you to verify your identity or understand the scope of your request.

If you wish to exercise any of your rights or if you have any questions about these rights, please contact our Privacy Team at privacy@aras.com

Timing: We will respond to requests within 1 month unless we need more time, in which case we will notify you and may take up to 90 days total to respond to your request.

Updates to this Privacy Notice

We may change and update this Privacy Notice from time to time. Any updated Privacy Notice will be effective when posted. If we decide to change and update our Privacy Notice, we will post the updated Privacy Notice on our website and update the "Last updated and effective date." Please check back regularly to review any changes to this Privacy Notice.

Contact Aras

If you have questions or concerns about this Privacy Notice or our handling of your personal information, please contact us at privacy@aras.com.

You may also contact the Data Protection Officer if you are in Germany:

Holzhofer Consulting GmbH

Martin Holzhofer

Lochhamer Str. 31

82152 Planegg

Tel.: (0 89) 1 25 01 56 00

Email: datenschutzbeauftragter-aras@holzhofer-consulting.de