

74 Software DBA Axway Product Privacy Notice for Workbench

October 2025

Please read this Privacy Notice carefully to understand 74Software policies and practices regarding how personal data may be collected and processed through Amplify Engage, and how the product processes that data.

Axway Workbench is a central observability, control, and automation point for data transfer products such as Transfer CFT and SecureTransport, helping to simplify and improve the management of complex environments.

SCOPE OF THIS PRODUCT PRIVACY NOTICE

This Privacy Notice applies solely to processing of personal data through Workbench when you use the product. Please note that the Workbench leverages the MFT solutions, for which the details are captured in a separate product privacy notice.

Unless otherwise specified, this Privacy Notice does not apply to any other information processed in any other way (whether online or offline).

For processing of personal data by 74Software DBA Axway in the course of our business relationship, please refer to 74Software's Privacy Statement (<https://www.axway.com/en/privacy-statement>) and 74Software's Privacy compliance program (<https://www.axway.com/en/gdpr>).

PERSONAL DATA PROCESSED BY THE PRODUCT

For the purposes of the service as outlined above, the following information will be required:

- First and last names of customer's employees
- Emails of the customer's employees
- Digital certificate information of the customer
- Username or login ID of the customer employees in their external IDPs

That information may be considered personal data if the email address relates for instance to the name of an identified or identifiable individual.

The user also has the choice of providing a first name and last name for their user account. Providing a first name and last name is optional for the use of Workbench.

Workbench does not require other personal data or any sensitive data, if you choose to process personal or sensitive data through Workbench, you warrant that you are duly authorized to process those data and that you do so lawfully in compliance with relevant legislation.

As per our general terms and conditions for subscription services, we shall not access your content except in response to support or technical issues where you provide us with prior written authorization, required to access such content.

PROCESSING OF PERSONAL DATA BY THE PRODUCT

Who is the data controller?

When you choose to process personal data through the product including this component, you are the controller of the processing and therefore warrant that your processing is compliant with all laws and regulations in force applicable to your processing of personal data (Applicable Laws and Regulations), including the Regulation (EU) 2016/679 (General Data Protection Regulation).

What is the purpose of the processing of personal data by the product?

As data controller, you determine the means and purpose of the processing of personal data, if any, you make using the product.

As the controller of the processing, you are responsible for ensuring that any processing you make using the product is compliant with the Applicable Laws and Regulations. Please note that depending on your specific use of Amplify Engage, the purpose of the processing may differ. 74Software shall have no responsibility if your use of the product is not compliant with the Applicable Laws and Regulations.

Is 74Software a data processor?

If 74Software manages the hosting environment for Workbench, and if you process personal data through the product/component, 74Software is a processor of such personal data, on your behalf. If 74Software manages the hosting environment Workbench and if you process personal data through the product/component, 74Software is a processor of such personal data, on your behalf.

If any personal data is to be processed by 74Software as a data processor on your behalf, it is mandatory to establish a data processing agreement ("DPA" as completed on our website or otherwise agreed to in writing) in which you determine the purposes and means of the data processing you want 74Software to process on your behalf.

In any case, it remains your responsibility and liability (as controller) to implement effective technical and organizational measures and be able to demonstrate the compliance of processing activities even if the processing is carried out by 74Software acting as data processor on your behalf.

When 74Software is processor, are there sub-processors?

Sub-processors: When 74Software manages the hosting environment, services are hosted by (Amazon Web Services Inc. or Azure) at the location defined in your subscription agreement. 74Software has appropriate Data Protection Agreements in place with Amazon Web Services and with Microsoft.

ACCESS AND RETENTION POLICY WITHIN THE PRODUCT

As a user of Workbench and controller of data processing, you determine the access and retention policies applicable to the data you process with Workbench. 74Software does not have access to your data or parameters you configure and therefore cannot manage on your behalf requests from eventual data subject (rectification, erasure...), unless otherwise expressly mutually agreed in the DPA.

When 74Software is a processor, and unless otherwise expressly agreed in the agreement or the DPA, we will delete or return to you all personal data we may have after the end of the provision of the services related to the processing.

SECURITY MEASURES

As data controller, it is your responsibility and liability to implement effective technical and organizational measures, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using the technical or organisational measures, and be able to demonstrate the compliance of your personal data processing activities.

When 74Software is a processor of personal data on your behalf in the use of the Product, the applicable security measures are those provided in the DPA (security measures attached to the DPA or specific security measures as agreed).

CHANGES TO THIS PRODUCT PRIVACY NOTICE

74Software will review and update this Privacy Notice periodically and will note the date of its most recent revision above. If we make material changes to this Privacy Notice, we will notify you either by prominently posting a notice of such changes prior to implementing the changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how 74Software is collecting, using, retaining, protecting, disclosing, and transferring your information.