

Axway Product Privacy Notice for AMPLIFY INTEGRATION RA

April 2024

Please read this Privacy Notice carefully to understand Axway policies and practices regarding how personal data may be collected and processed through AMPLIFY Integration, and how the product processes that data.

Amplify Integration enables Axway customers to extend their existing integrations to multiple software applications, systems, and data sources. It is a fully hybrid solution that can adapt to the customer's environment. The low-code no-code approach improves efficiency, enables automation, and provides better insights and decision-making capabilities through access to a broader range of data. The goal is to provide our customers with a solution that improves their business's operations, making them more productive, efficient, and competitive.

SCOPE OF THIS PRODUCT PRIVACY NOTICE

This Privacy Notice applies solely to processing of personal data through AMPLIFY INTEGRATION when you use the product.

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

PERSONAL DATA PROCESSED BY THE PRODUCT

For each partner you wish to onboard on your AMPLIFY INTEGRATION platform, the following information will be required:

- Name
- Email address

That information may be personal data if the identification of the partner and/or their email address is the name of a human being for instance.

AMPLIFY INTEGRATION does not require other personal data or any sensitive data, if you choose to process personal or sensitive data through AMPLIFY INTEGRATION, 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, 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 purpose of the processing of personal data, if any, you make using the product.

AMPLIFY INTEGRATION typically processes data, which may be personal data, for the following purpose:

- (i) for the performance of a contract to which the data subject is party, or
- (ii) in order to take steps at the request of the data subject prior to entering into a contract.

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 INTEGRATION, the purpose of the processing may differ. Axway shall have no responsibility if your use of the product is not compliant with the Applicable Laws and Regulations.

Is Axway a data processor?

When you are managing the hosting environment for AMPLIFY INTEGRATION (**Customer Managed Subscription** or **Product License**), you do not need to give access to any personal data to Axway to use AMPLIFY INTEGRATION therefore, Axway does not process any personal data on your behalf as processor.

When Axway is managing the hosting environment for AMPLIFY INTEGRATION (**Axway Managed Subscription**), and you process personal data through the product, Axway is a processor of such personal data, on your behalf.

If any personal data is to be processed by Axway 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 Axway to process on your behalf.

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

When Axway is processor, are there sub-processors?

Sub-processors: When Axway is managing the hosting environment, AMPLIFY INTEGRATION is hosted by Amazon Web Services Inc. or Azure at the location defined in your subscription agreement. Axway has appropriate Data Processing Agreement in place with Amazon Web Services and with Microsoft.

Amplify Integration uses an Outlook server to send emails.

ACCESS AND RETENTION POLICY WITHIN THE PRODUCT

As user of AMPLIFY INTEGRATION and controller of the processing, you determine the access and retention policies applicable to the data you process with AMPLIFY INTEGRATION. Axway 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 Axway 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, you In any case, it is your responsibility and liability to implement effective 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 Axway 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

Axway 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 Axway is collecting, using, retaining, protecting, disclosing, and transferring your information.