

Axway Product Privacy Notice for Axway Financial Accounting Hub

April 2024

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

Axway Financial Accounting Hub process data from the business application of company and transform them to produce event for financial and reporting system.
The whole transformation is auditable to provide compliant information to accountant, whereas exception can be managed through directly from the solution.

SCOPE OF THIS PRODUCT PRIVACY NOTICE

This Privacy Notice applies solely to processing of personal data through Financial Accounting Hub 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

There is no personal data processing through Financial Accounting Hub itself.

Financial Accounting Hub does not require personal data or any sensitive data, if you choose to process personal or sensitive data through Financial Accounting Hub, you warrant that you are duly authorized to process those data and that you do so lawfully in compliance with relevant legislation. A user that connects to the solution must be done using the customer's own Identity Provider, and the user must just be identified by a unique alias information that is configured on the customer's side.

Financial Accounting Hub can store such an alias for auditable reasons but does not store mail address or other personal information links to this alias.

As per our general terms and conditions, Axway 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 means and purpose of the processing of personal data, if any, you make using the product.

Financial Accounting Hub typically processes financial data, which may be personal data, such as financial transaction of customer, or bank transfer for example.

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 Financial Accounting Hub, 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 Financial Accounting Hub (**Customer Managed Subscription**), you do not need to give access to any personal data to Axway to use Financial Accounting Hub therefore, Axway does not process any personal data on your behalf as processor. When Axway is managing the hosting environment for Financial Accounting Hub (**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 technical and organizational 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, Financial Accounting Hub is hosted by a public cloud company (such as Amazon Web Services Inc. or Azure) at the location defined in your subscription agreement. Axway has appropriate Data Protection Agreements in place with Amazon Web Services and with Microsoft.

ACCESS AND RETENTION POLICY WITHIN THE PRODUCT

As user of Financial Accounting Hub and controller of the processing, you determine the access and retention policies applicable to the data you process with Financial Accounting Hub. 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, it is your responsibility and liability to implement effective technical and organizational measures, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using the technical or organizational 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 ending 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.