

# **PTC - Privacy Statement**

Effective: January 2025

## Scope & Introduction

Thanks for entrusting PTC Inc. and its Affiliates ("PTC", "we", "us" or "our") with your Personal information. This Privacy Statement explains our practices regarding the collection, use, and disclosure of your Personal information, including any Personal information we collect and process in connection any applications, software, products, including Creo, Windchill, Vuforia and our cloud and SaaS services including Onshape, Arena Solutions, ServiceMax and Codebeamer business units, professional services and training courses (collectively, the "Service(s)") and conducting our business. This Privacy Statement also explains the collection and use of Personal information relating to visitors to our websites including ptc.com, servicemax.com, arenasolutions.com and other sites that are linked to this Privacy Statement ("websites").

We have additional Privacy Statements concerning the collection and processing Personal Information concerning:

- Job Applicants
- SaaS Users and Mobile Apps
- Children's Data including Onshape Education Plans

which supplement the terms of this PTC – Privacy Statement.

We use your Personal information as this Privacy Statement describes. No matter where you are, where you live, or what your citizenship is, you have the same high standard of privacy protection when using PTC's products and Services, visiting our websites, regardless of your country of origin or location.

#### Summary

This PTC Privacy Statement aims to explain what Personal Information is processed by PTC, who uses your Personal Information, for what purpose, for how long, and explains what rights you have in this context.

Who collects and processes your Personal Information?

PTC does, in the form of the respective legal entity, being either PTC Inc. of Boston Massachusetts or any another entity of the global group of PTC companies. The PTC Privacy Statement describes in detail which processing activities of which PTC group entity apply.

What Personal Information do we collect?

PTC may collect various types of Personal Information about you when conducting its business, including:

- personal contact information,
- Personal Information related to your or your employer's business relationship with PTC,
- Personal Information PTC must collect due to legal- and compliance-related purposes,



- personal usage, registration, and participation information which PTC may generate through your use of its products and Services,
- special categories of Personal Information,
- application-related Personal Information,
- Personal Information which PTC may receive from third parties,
- Personal Information PTC requires to ensure your or your employer's satisfaction with our current and future Services, products and offerings.
- Personal Information we may collect when you visit our facilities or attend events, either online or in person.

# How we use your Personal Information?

PTC uses your Personal Information to:

- pursue its business relationships with you, your employer, or your employer's customers, including ensuring your satisfaction with and keeping you up to date on the latest news about our products and services,
- develop and offer you, or your employer, its software products, cloud, SaaS and other Services,
- protect the quality and safety of its premises, facilities, products or Services infrastructure and data
- secure and, if necessary, defend its protected assets against unlawful attacks, assert its rights or defend PTC against legal claims,
- ensure compliance with statutory laws and regulations,
- operate its websites, web offerings, or other online events including analyzing the behavior of the users on those websites, enabling you to create a user profile, benefit from an identity service such as single-sign-on and to promote and continuously improve the user experience,
- search you as a potential talent for PTC,
- transfer it to recipients like other PTC Affiliates, third-party service providers, PTC partners and others.

If you want to learn more about each of these purposes for which PTC may collect, transfer, and use your Personal Information, including for how long your Personal Information is being retained and, specific to the General Data Protection Regulation (GDPR), the legal ground on which PTC is pursuing them and, specific to the California Consumer Privacy Act, the categories of Personal Information processed, please refer to the full PTC Privacy Statement below.

#### 1. What Personal Information do we collect?

We may collect and process the following Personal information about you:

• Information that you provide by filling in forms on our internal or external sites, including our websites, and information you provide on independent partner sites that is transferred to us. This includes information provided at the time of registering to use our Services, information that you share in webforms and chatbots on our websites, signing up for and accessing trial versions of our Services or downloading free and trial versions of our products and Services, posting material or requesting further services. We may also ask you for Personal Information when you report a problem with our websites, our products and Services or reporting suspected piracy or unlawful use of our Services.



- We collect the names or contact information of individuals (such as email address, phone number, title,) authorized to access account and billing information (including billing address) that is associated with its account. Such Personal Information also includes any data PTC may need to collect for the purpose of managing its relationship with the Organization, identity verification, or as otherwise required by applicable laws and regulations.
- If you use our products or if access to our Services is created by or at the request of an organization (our Customer which may include your school or college, or Partner all of which are an "Organization") of which you are an employee, contractor, member, agent, student or other participant (each such user referred to as an "Organization User") your Organization may provide us with certain Personal Information, such as your name, role, email address, and telephone number and organization name, and certain technical information.
- If you contact us, on your own behalf or on behalf of an Organization, we will keep a record
  of that correspondence. We may also collect and retain audio and video recordings of
  meetings that you attend with PTC.
- We may also invite you to complete surveys, and participate in interviews that we use for research purposes.
- Details of transactions you carry out and of the fulfilment of your orders, including the downloading and licensing of software, and the accessing of our Services.
- Details of your visits to our websites including, but not limited to, traffic data, data
  regarding the site pages you visit, weblogs, and other communication data, whether this
  is required for our own billing purposes or otherwise, and the resources that you access.
   See "Cookie Settings" on ptc.com for more information.
- Information that you supply to us in the course of general marketing and other business activities.
- Information that you supply to us when you visit our facilities or while attending an event
  (either in person or online) at which PTC is a host, a participant or which is sponsored (in
  whole or in part) by PTC such as Liveworx or CXO Summits. We may also make video
  and/or audio recordings and take photographs at live events.
- Information that you provide or disclose on notice boards, newsgroups, community feedback sites, email systems, forum facilities, chat rooms, or similar features that we may establish on our sites.
- Information that is provided to PTC by third parties such as our business partners, marketing partners and your co-workers, in the course of PTC promoting, providing and supporting PTC's products and Services. PTC may also acquire Personal information from third party sources that have the legal right to share your Personal information with PTC for the purpose of marketing our products and services, or where that information has been made publicly available. We may combine this information with Personal Information provided by you.
- Information that you supply to us or that we obtain/create in the course of your application for employment or engagement (for example, salary, performance evaluations, benefits data, background checks). See our <u>Job Applicant Privacy Statement</u>.
- Through the use of our product telemetry, (such as our Performance Advisor functionality)
  aggregated and de-identified information on system use and performance and use
  metrics, for example information relating to the types and features of Services and
  products being used, the configuration of computers used to access the Services or on
  which our products are used, performance metrics related to the use of the Services and



products, data identifying the source and destination of a communication and activity logs. (See Data Collection at <u>Legal Policies</u>, <u>Agreements and Disclaimers | PTC</u>)

## 2. How we Use Your Personal Information

In general, we will only process Personal Information where the processing is in our legitimate interests or required to perform a contract with you or an Organization. We use Personal Information in the following ways:

- To ensure that content from our sites is presented in the most effective manner for you and for your computer.
- To provide you with information, products or Services that you request from us or which we feel may interest you.
- To carry out our obligations arising from any contracts entered into between you and us, or our obligations to the Organization that had granted you access to our Services.
- To allow you to participate in interactive features of our Service, when you choose to do
- In order to better serve you with respect to PTC products and Services that are available from time to time.
- To notify you with important information about our Service, updates to our sites, new PTC product offerings or special events hosted or sponsored by PTC or its business partners.
- In order to enforce or apply our terms of use of any one of our websites, our software licenses, hosted services, SaaS, and other agreements.
- To protect the rights, property, or safety of PTC, our customers, and others.
- To provide you with updates on any events you are registered to attend or may be interested in.
- If you attend or speak at any of our events or events that we attend as a sponsor, we may make recordings of such events for use in promotional and educational material.
- If you visit our offices or sites, we maintain CCTV footage for the safety and protection of PTC and PTC's premises.
- For Organizational Users to provide products and services on behalf of the Organization in accordance with terms of the agreement between PTC and the Organization.
- Aggregated and de-identified information may be used to optimize and maintain performance of the Services, and to investigate and prevent system abuse to monitor, investigate, prevent and detect fraud, security incidents and other misuse of the Services and our products, and to prevent harm, to provide, optimize, enhance, and maintain PTC Services and products, including trouble shooting issues and developing, informing the development of new products and features.

If you are an applicant for a job or for engagement by PTC, we use Personal Information about you to determine your suitability for employment, job assignments and responsibilities in accordance with our <u>Job Applicant Privacy Statement</u>.

If you are a PTC employee, we use Personal Information about you for various employment-related purposes, primarily relating to establishing and managing our employment relationship with you. Please refer to our Employee Privacy Notice Statement that is available on The Hub.

We may provide information to you in the form of emails, mailings, website displays or other correspondence methods.



We are interested in your views, and we value feedback, and we may therefore set up notice boards, newsgroups, community feedback sites, email systems, forum facilities and/or chat rooms on our sites. Any information that you disclose via such facilities will be used in accordance with the terms of service for the particular forum and in the absence of such terms of service, this Policy. However, we can of course not control and be responsible for other parties' use of the Personal Information which you make available to them through such facilities and otherwise on our sites. We encourage you to be careful about what Personal Information you share in this way.

We will only use and share Personal Information in ways that are relevant for the purposes for which the information was collected or subsequently authorized by you.

#### 3. TRANSFER AND SHARING PERSONAL INFORMATION

We may transfer or disclose Personal Information to other third parties who agree to process such Personal Information in accordance with our instructions and provide appropriate technical and organizational security measures. Such third parties may include:

- Other members of the PTC group of companies where it is necessary for the efficient provision of Services and the most productive use of PTC's resources
- our authorized resellers and business partners for the limited purposes of offering our products and associated services.
- To trusted businesses or persons to process it for us, solely on our behalf.
- In the event that we sell or buy any business or assets, in which case we may disclose your Personal Information to the prospective seller or buyer of such business or assets.
- If any PTC entity, or substantially all of its assets are acquired by a third party, in which
  case Personal Information held by it about its customers will be one of the transferred
  assets.
- If we are under a duty to disclose or share your Personal Information in order to comply
  with any legal obligation, or in order to enforce or apply our terms of use of any of our
  sites and other agreements; or to protect the rights, property (including data), or safety
  of PTC, our customers, or others. This includes exchanging information with other
  companies and organisations for the purposes of fraud protection and credit risk
  reduction.
- government agencies or other third parties as authorized by applicable law: (i) to comply with legal, regulatory, or reporting requirements (such as reporting to tax authorities and employment regulators), (ii) in the event we are required to respond to a court order, subpoena, discovery request, or other legal process, or if, in our good faith opinion, such disclosure is required by law, (iii) at the request of governmental authorities conducting an audit or investigation, (iv) to verify or enforce compliance with applicable employee policies, laws, rules, or regulations, (v) in connection with corporate restructurings or potential acquisitions, mergers, or sales, or (vi) whenever we believe disclosure is necessary to limit the legal liability, or to protect or enforce the rights, interests, or safety, of you, the Company, our subsidiaries and affiliates, other employees, or third parties.

It is PTC's policy to never sell or share your information with third parties to for commercial gain.

If you use a PTC product or a Service with an account provided by an Organization you are affiliated with, such as your work, that Organization can:



- Control and administer your PTC product and product account, including controlling certain privacy-related settings of the product or Service account.
- Access and process your Personal Information, including the interaction data, diagnostic data, and files associated with your PTC product and Service accounts.

If you lose access to your work or school account (in event of change of employment, for example), you may lose access to products and the content associated with those products.

PTC's products and Services are primarily intended for use by organizations, such as businesses. If your organization provides you with access to PTC products, your use of the PTC products is subject to your Organization's policies, if any. You should direct your privacy enquiries, including any requests to exercise your data protection rights, to your Organization's administrator. When you use collaborative features in PTC services, other users in your network may see some of your activity. PTC is not responsible for the privacy or security practices of our customers, which may differ from those set forth in this privacy statement.

When you use a PTC product or Service provided by your Organization, PTC's processing of your Personal Information in connection with that product is governed by a contract between PTC and your Organization. PTC processes your Personal Information to provide the product and Services to your Organization and you.

For more information about how PTC processes Personal Information when registered users use our Service, please see the <a href="PTC SaaS">PTC SaaS</a> and <a href="Mobile App Privacy Statement">Mobile App Privacy Statement</a>.

#### 4. MARKETING CHOICES

Whenever you submit requests for more information or services from us, you may opt out of entering certain fields. However, such decision may affect our ability to provide what you have requested. You can opt out from receiving marketing messages (email, phone or SMS) by clicking on the "unsubscribe" link included in them or by contacting your PTC account executive. Such opt out will not extend to services announcements, transactional or relationship messages. Please let us know during a telemarketing call that you do not want to be called again for marketing purposes.

## 5. Where we Store and access your Personal Information

PTC is a global company, headquartered in the United States and as such your Personal Information may be processed in the United States or accessed from anywhere in the world. If you are visiting any of our sites or communicating electronically with us, various communications will necessarily result in a transfer of Personal Information across international boundaries. Accordingly, by visiting any of our website, using our Services and/or communicating electronically with us (including the in the process of our providing information, software or Services to you or your Organization) your Personal Information may be processed in a country other than the one in which you reside.

PTC endeavors to apply suitable safeguards to protect the privacy and security of your Personal Information and to use it only consistent with your relationship with PTC and the practices described in this Privacy Statement. PTC provides appropriate safeguards by entering binding, standard data protection clauses, enforceable by individuals in the EEA, Switzerland and the UK. PTC also enters into data processing agreements and standard contractual clauses with its vendors and other services providers with which we may share



Personal Information or who may support PTC in its business operations or in providing the Services, whenever feasible and appropriate.

Please see <u>PTC Cybersecurity & Data Privacy Addendum</u> – **Section 9**, for more information relating to the International Transfer of Personal Information when PTC is processing Personal Information on behalf of an Organization.

#### 6. INFORMATION INTEGRITY

We will take reasonable steps to ensure that Personal Information that we process is reliable for its intended use, accurate, complete, and current. You are responsible for the accuracy of all Personal Information you provide to us. We will use reasonable efforts to maintain the accuracy and integrity of the Personal Information we obtain, and to update it as appropriate. We will take reasonable steps to ensure that Personal Information is reliable for its intended use.

#### 7. How do we protect Personal Information?

We take the security of your Personal Information seriously. We have internal policies (such as our Cybersecurity Policies) and controls in place to ensure that your Personal Information is not lost, accidentally destroyed, misused or disclosed. All of your Personal Information will therefore be held securely and processed only by those who use your Personal Information for the purposes for which it was collected or you have otherwise authorized. Please see PTC's Trust Center for more information about PTC's cybersecurity practices.

You are responsible for keeping all access credentials, such as your username and password, required to access our Services, confidential. Your password must not be shared with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. We have put in place procedures to deal with any suspected cybersecurity breach and we will notify you and any applicable regulator of a breach or suspected breach where we are legally required to do so. Although we have security measures in place to protect your Personal Information, we cannot guarantee its security.

#### 8. COMPLIANCE AND ENFORCEMENT

We will conduct periodic internal compliance audits of our relevant privacy practices to verify adherence to this privacy statement. You can raise any concerns that you may have about the way we process your Personal Information by contacting us as described below.

We commit to resolve questions and complaints about your privacy and the collection or processing of your Personal Information. Individuals who believe that PTC or any of its affiliates is not complying with the terms of this Statement, can contact PTC's Global Data Privacy Officer, as set out in **Section 17 below**.

PTC's OpenDoor reporting platform also provides details of telephone numbers to call if you would prefer to speak with someone. All reports made through our OpenDoor platform are handled in strictest confidence.

We will answer any questions and investigate any concerns or complaints. We will do our best to internally resolve any complaints and disputes regarding the use and disclosure of Personal Information brought to our attention.



#### 9. UNLAWFUL USE OF PTC SOFTWARE AND SERVICES

PTC regards software piracy as the crime it is, and we view offenders accordingly. We do not tolerate the unlawful use of PTC software products, and we pursue those who do so using all legal means available, including public and private surveillance resources. As part of these efforts, PTC utilizes information monitoring and scouring technologies to obtain and transmit information on unauthorized use of software. Such information may be transferred and processed in a country other than the one where the software is being used or accessed. If you are using an unauthorised or unlicensed copy of our software, cease using it immediately and contact PTC to obtain a legally licensed copy. By using an unauthorized or unlicensed copy of PTC software, you should be aware that PTC will collect, use, and transfer Personal Information internationally for the purposes of identifying users of such software. This Personal Information may include online identification, such as IP address, MAC address and geolocation. PTC has a legitimate interest in protecting its intellectual property rights and preventing the unlawful use of its products and services. For more information, please see <a href="https://www.ptc.com/en/documents/software-piracy">https://www.ptc.com/en/documents/software-piracy</a>

# 10. Personal Information relating to Children who are Under 13 (or under 16 in the EU)

Except where are products and services are being used for education purposes in a school or college context, our sites and Services are not directed to children younger than age thirteen (13) or under the age of sixteen 16 in the in the European Union. We do not knowingly collect Personal Information from children under these ages on any of our sites and we will delete any such information if it is determined to be from such young person, unless we have received consent to collect such Personal Information from the child's parent or guardian or someone with parental authority. In the event a parent or guardian believes that his/her child has provided Personal Information to PTC and wishes that Personal Information to be removed or corrected, please contact PTC as described below.

For more information about the collection and use of Personal Information relating to users of our Educational Services and other PTC products made available as part of a program directed to school or college users of our products or services, please see the <a href="PTC PrivacyStatement for Children's Personal Information and Onshape Education Plans">PTC Privacy Statement for Children's Personal Information and Onshape Education Plans</a>.

#### 11. OTHER SITES

Our sites may, from time to time, contain links to and from the websites of acquired businesses, our authorized resellers, business partners, industry forums, analysts and to other sites that are relevant to our products and Services. Additionally, for some of the functions within our websites we link to/use third party suppliers for example, when you visit a page with videos embedded from or links to YouTube or slide-share. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Information to these websites.

## 12. YOUR RIGHTS

In certain circumstances, if you are resident in certain jurisdictions, you may exercise the rights available to you under applicable data protection laws as follows:



- If you wish to access, correct, update or request deletion of your Personal Information, you can do so at any time by contacting us using the contact details below.
- In addition, you can object to processing of your Personal Information, ask us to restrict processing of your Personal Information or request portability of your Personal Information. Again, you can exercise these rights by contacting us using the contact details provided below.
- If we have collected and process your Personal Information with your consent, then you can withdraw your consent at any time. This may mean your access to certain services is restricted or denied as a result. 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 conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a Personal Information protection authority about our collection and use of your Personal Information. For more information, please contact your local Information protection authority.

We respond to all requests we receive from individuals wishing to exercise their Information protection rights in accordance with applicable Information protection laws.

To exercise your rights, please contact us by using the information in **Section 17 below**. Your Personal Information may be processed in responding to these rights. We try to respond to all legitimate requests within one month unless otherwise required by law, and will contact you if we need additional information from you in order to honour your request or verify your identity. Occasionally it may take us longer than a month, taking into account the complexity and number of requests we receive.

Some Users may update their user settings, profiles, organisation settings and event registrations by logging into their accounts and editing their settings or profiles.

Where we process Personal Information submitted by or for an Organization that has purchased our products or Services we may process such Personal Information as a processor on behalf of our customer (and its affiliates) who is the controller of the Personal Information, under the terms of our Cybersecurity and Privacy Addendum. If we are processing your Personal Information on behalf of a PTC customer and you wish to exercise any rights you may have under applicable data protection laws, please contact the Organization.

## 13. How long do we keep your Personal Information for?

We retain your Personal Information for as long as necessary to achieve the purpose for which your Personal Information was originally collected, such as provide you with the services you have requested and or to meet our legitimate business purposes, such as maintaining and improving our services, complying with legal obligations, resolving disputes, and enforcing our agreements. The specific retention periods may vary depending on the type of Personal Information and the purpose for which it was collected. Once your Personal Information is no



longer required, we will securely delete or anonymize it in a manner that ensures your privacy is protected.

#### 14. LEGAL BASIS FOR PROCESSING FOR EEA USERS:

For Personal Information collected about you in the EU/EEA, the UK and other relevant jurisdictions, our basis for processing is the following:

- We rely on our legitimate interest in processing contact and related information about you in order to provide our Services, communicate adequately with you, to respond to your requests, and to tailor our marketing and sales activities to your professional interests.
- In order to engage in transactions with customers, suppliers and business partners, and to process purchases and downloads of our products and services, we need to process information about you as necessary to enter into or perform a contract with you, personally or.
- We process Personal Information for marketing and sales activities (including events) based on your consent where so indicated on our sites at the time your Personal Information was collected, or further to our legitimate interest to keep you updated on developments around our products and services which may be of interest to you.
- We rely on our legitimate interest to analyze, develop, improve and optimize our sites, facilities, products and services, and to maintain the security of our sites, networks and systems.
- In order to comply with applicable laws and regulations, such as to comply with a subpoena or other legal process, or to process an opt-out request.

## 15. ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS:

The California Consumer Privacy Act (as amended by the California Privacy Rights Act) requires businesses to disclose whether they sell or share Personal Information. As a business covered by the CCPA, we do not sell Personal Data. We may share Personal Information (in the form of identifiers and internet activity information) with third party advertisers for purposes of targeting advertisements on non-Salesforce websites, applications and services. In addition, we may allow third parties to collect Personal Information from our sites or services if those third parties are authorised service providers who have agreed to our contractual limitations as to their retention, use, and disclosure of such Personal Data, or if you use our Websites or Services to interact with third parties or direct us to disclose your Personal Information to third parties.

California law requires that we detail the categories of Personal Data that we disclose for certain "business purposes," such as to service providers that assist us with securing our services or marketing our products, and to such other entities **as described in Sections 5** and 6 of this Privacy Statement.

We process and disclose the following categories of Personal Information for our business purposes:

Identifiers;



- Commercial information;
- Internet activity information;
- Financial information;
- Professional and employment-related information;
- Education information;
- Geolocation data:
- Audio and visual data;
- Inferences drawn from any of the above information categories.

California law grants state residents' certain rights, including the rights to know and access specific types of Personal Information, to learn how we process Personal Information, to request deletion of Personal Information, to request correction of Personal Information, to opt-out of sharing your Personal Information for third party advertising purposes, and not to be denied goods or services for exercising these rights.

For information on how to exercise your rights, **please refer to Section 12 of this Privacy Statement**. We may need to verify your identity and place of residence before completing your rights request.

## 16. CHANGES TO OUR PRIVACY POLICY

This Statement may be amended from time to time. Any changes we may make to our Privacy Statement in the future will be posted on this page and, where appropriate, notified to you by e-mail. When amendments are made, we will revise the "last updated" date at the top of this Statement.

# 17. How to Contact Us

If you have any questions or concerns about our use of your Personal information or this Privacy Policy, please contact us using the following details:

The Global Data Privacy Officer PTC Inc.

121 Seaport Boulevard, Boston MA 02201 Attn: Compliance Department – Privacy

or

dataprivacy@ptc.com

OI

www.ptc.com/opendoor

International Contact telephone numbers are available on PTC's OpenDoor website.

If you are a resident of a European Union member state or Switzerland or the UK, you also have the right to seek assistance from the data protection authorities. Click <a href="here">here</a> for EU Data Protection Authorities and click <a href="here">here</a> for Swiss Federal Data Protection and Information Commissioner and click <a href="here">here</a> for the UK's Information Commissioner's Office.