

## ADDITIONAL DATA PRIVACY TERMS FOR BRIGHTLY SOFTWARE OFFERINGS

### Annex I to DPT (and, where applicable, the Standard Contractual Clauses)

#### **Description of the Processing Operations**

This Annex contains a specific description of the processing operations (including, but not limited to, the subject-matter of the processing, the nature and purpose of the processing, the type of personal data and categories of data subjects) for the Brightly Software<sup>1</sup>, a Siemens Company, Offering(s). It replaces Annex I of the Data Privacy Terms document available at [www.siemens.com/dpt](http://www.siemens.com/dpt).

#### **A. LIST OF PARTIES**

##### **Customer (and, where the Standard Contractual Clauses apply, data exporter):**

**Name, address and contact person's name, position and contact details:** Name and address of the Customer as well as contact details of a contact person are contained in the Agreement and/or collected as part of the Customer onboarding process.

**Role (Controller/Processor):** Customer acts as Controller for the processing activities provided by Siemens vis-à-vis Customer and, as the case may be, as Processor under the instructions of its Further Controllers for Processing activities provided by Siemens vis-à-such Further Controllers.

##### **Provider (and, where the Standard Contractual Clauses apply, data importer):**

**Name, address and contact person's name, position and contact details:** The provider / data importer proving the Processing services hereunder is the Siemens company specified in the Agreement. Point of contact for data privacy inquiries is the Office of the Siemens Data Protection Officer, Werner-von-Siemens-Straße 1, 80333 Munich, Germany, E-Mail: [dataprotection@siemens.com](mailto:dataprotection@siemens.com).

**Role (Controller/Processor):** Siemens acts as Processor Processing Personal Data on behalf of Customer and, as the case may be, Customer's Further Controllers.

#### **B. DESCRIPTION OF TRANSFER / PROCESSING OPERATIONS**

##### **Categories of data subjects whose Personal Data is transferred/Processed**

Data Subjects include:

- employees,
- contractors,
- suppliers,
- business partners; and
- other individuals whose Personal Data is stored on the Offerings and/or is Processed in the context of providing the Offerings.

##### **Categories of personal data transferred**

The Personal Data transferred/Processed concern the following categories of Personal Data:

---

<sup>1</sup> 'Brightly Software,' as defined in the applicable customer agreement, means,:

- Brightly Software, Inc., 11000 Regency Parkway, Suite 300, Cary, NC 27518 USA
- Brightly Software Canada Inc., 333 Bay Street, Suite 2400, Toronto, Ontario M5H 2T6 Canada
- Brightly Software Limited, Pinehurst 2, Pinehurst Road, GU14 7BF Farnborough, Hampshire UK
- Brightly Software Australia Pty Ltd, Level 9, 257 Collins Street, Melbourne, Victoria 3000 AUS



- contact and user information, including name, address data, phone number, email address, location(s) and time zone;
- system access, usage and authorization data, containing Personal Data or any other application-specific data which users enter into the Offerings or provided in conjunction with the Offerings;
- Where location services are part of the Offering: GPS and geolocation data; and
- where applicable further Personal Data as determined by Customer and its Further Controllers by uploading or connecting it to the Offerings or otherwise granting access to it via the Offerings.

#### **Sensitive data transferred (if applicable)**

The Offerings are not intended for the processing of Sensitive Personal Data and Customer and its Further Controllers shall not transfer, directly or indirectly, any such Sensitive Personal Data to Siemens.

An exception applies where locations services are part of the Offering and geo location data, such as GPS data, qualify as sensitive personal data in a relevant country.

#### **The frequency of the transfer (e.g. whether the data is transferred on a one-off or continuous basis)**

If the Offering(s) include the provision of Software or Cloud Services ("Cloud Services"), Siemens continuously hosts Personal Data on behalf of Customer and, as the case may be, Further Controllers, during the provision of these Offering(s).

If the Offering(s) include the provision of managed or professional Services ("Professional Services" or "Managed Services"), Siemens remotely accesses Personal Data when providing the services either on one-off basis (professional services) on a continuous basis (ongoing managed services), during the provision of these Offering(s).

#### **Nature of the processing and purpose(s) of the data transfer and further processing**

Siemens and its Subprocessors will Process Personal Data to provide the Offerings, including:

- internet accessible or similar Offerings made available and hosted by Siemens ("Cloud Services"); or
- administration, management, installation, configuration, migration, maintenance and support Offerings or any other Offerings requiring (remote) access to Personal Data stored in the Cloud Offerings or on Customer's IT systems ("Professional Services" or "Managed Services").

#### **The period for which the personal data will be retained, or, if that is not possible, the criteria used to determine that period**

The Personal Data will be retained for the period of the Agreement. Customer has the ability to rectify, erase or restrict the Processing of Personal Data via the functionalities of the services, or (ii) Siemens rectifies, erases or restricts the Processing of Personal Data as instructed by Customer.

#### **For transfers to (sub-) processors, also specify subject matter, nature and duration of the processing**

The subject matter, nature and duration of the processing are specified per Subprocessor in Annex III.

#### **C. Where the Standard Contractual Clauses apply: COMPETENT SUPERVISORY AUTHORITY**

For Customers located in the European Union, the supervisory authority responsible for the Customer shall act as competent supervisory authority.

A list of the supervisory authorities in the EU is available here: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)



## Annex II to DPT (and, where applicable, the Standard Contractual Clauses)

### Technical and organisational measures

This Annex contains a specific description of the technical and organizational measures (TOMs) for the Brightly Software, a Siemens Company, Offering(s) implemented by Siemens and its Subprocessors to protect Siemens' and Subprocessors' IT-systems and applications. It replaces Annex II of the Data Privacy Terms document available at [www.siemens.com/dpt](http://www.siemens.com/dpt).

Scenario 1: TOMs applicable to Cloud Services Offerings.

Scenario 2: TOMs applicable to Managed and Professional Services Offerings provided via remote access tools provided and controlled by Siemens.

Scenario 3: TOMs applicable to Managed and Professional Services Offerings provided via remote access tools provided and controlled by Customer.

#	Measures	Scenario			
		1	2	3	
1.	Physical and Environmental Security				
	Siemens implements suitable measures to prevent unauthorized persons from gaining access to the data processing equipment (namely database and application servers and related hardware). This shall be accomplished by:				
	a) establishing security areas;	X	X	-	
	b) protecting and restricting access paths;	X	X	-	
	c) securing the decentralized data processing equipment and personal computers;	X	X	X	
	d) establishing access authorizations for employees and third parties, including the respective documentation;	X	X	-	
	e) all access to the data center where Personal Data is hosted will be logged, monitored, and tracked;	X	-	-	
	f) the data center where Personal Data is hosted is secured by restricted access controls, and other appropriate security measures; and	X	-	-	
	g) maintenance and inspection of supporting equipment in IT areas and data centers shall only be carried out by authorized personnel	X	X	-	
2.	Access Control (IT-Systems and/or IT-Application)				
	2.1 Siemens implements an authorization and authentication framework including, but not limited to, the following elements:				
	a) role-based access controls implemented;	X	X	X	
	b) process to create, modify, and delete accounts implemented;	X	X	X	
	c) access to IT systems and applications is protected by authentication mechanisms;	X	X	X	
	d) appropriate authentication methods are used based on the characteristics and technical options of the IT system or application;	X	X	X	
	e) access to IT systems and applications shall require adequate authentication;	X	X	X	

#	Measures	Scenario		
		1	2	3
	f) all access to data (including personal data) is logged;	X	X	-
	g) authorization and logging measures for inbound and outbound network connections to IT systems and applications (including firewalls to allow or deny inbound network connections) implemented;	X	X	-
	h) privileged access rights to IT systems, applications, and network Offerings are only granted to individuals who need it to accomplish their tasks (least-privilege principle);	X	X	X
	i) privileged access rights to IT systems and applications are documented and kept up to date;	X	X	X
	j) access rights to IT systems and applications are reviewed and updated on regular basis;	X	X	X
	k) password policy implemented, including requirements re. password complexity, minimum length and expiry after adequate period of time, no re-use of recently used passwords;	X	X	X
	l) IT systems and applications technically enforce password policy;	X	X	X
	m) policy to lock user terminal when leaving the workplace;	X	X	X
	n) automatic time-out of user terminal if left idle;	X	X	X
	o) automatic turn-off of the user identification when several erroneous passwords are entered, along with log file of events (monitoring of break-in-attempts);	X	X	X
	p) access rights of employees and external personnel to IT systems and applications is removed immediately upon termination of employment or contract; and	X	X	X
	q) use of secure state-of-the-art authentication certificates.	X	X	-
	2.2 Siemens implements a roles and responsibilities concept.	X	X	-
	2.3 IT systems and applications lock down automatically or terminate the session after exceeding a reasonable defined idle time limit.	X	X	-
	2.4 Siemens maintains log-on procedures on IT systems with safeguards against suspicious login activity (e.g. against brute-force and password guessing attacks).	X	X	X

### 3. Availability Control

	3.1 Siemens defines, documents and implements a backup concept for IT systems, including the following technical and organizational elements:			
	a) backups storage media is protected against unauthorized access and environmental threats (e.g., heat, humidity, fire);	X	-	-
	b) defined backup intervals; and	X	-	-
	c) the restoration of data from backups is tested regularly based on the criticality of the IT system or application.	X	-	-
	3.2 Siemens stores backups in a physical location different from the location where the productive system is hosted.	X	-	-
	3.3 Siemens implements state-of-the-art anti-malware solutions to protect its systems and applications against malicious software.	X	X	X

#	Measures	Scenario		
		1	2	3
	3.4 IT systems and applications in non-production environments are logically or physically separated from IT systems and applications in production environments.	X	-	-
	3.5 Data centers in which Personal Data is stored or processed are protected against natural disasters, physical attacks or accidents.	X	-	-
	3.6 Supporting equipment in IT areas and data centers, such as cables, electricity, telecommunication facilities, water supply, or air conditioning systems are protected from disruptions and unauthorized manipulation.	X	-	-
4. Operations Security				
	4.1 Siemens maintains and implements a company-wide ISO 27001 Information Security Framework which is regularly reviewed and updated.	X	X	X
	4.2 Siemens logs security-relevant events, such as user management activities (e.g., creation, deletion), failed logons, changes on the security configuration of the system on IT systems and applications.	X	X	X
	4.3 Siemens continuously analyzes the respective IT systems and applications log data for anomalies, irregularities, indicators of compromise and other suspicious activities.	X	X	X
	4.4 Siemens scans and tests IT systems and applications for security vulnerabilities on a regular basis.	X	X	X
	4.5 Siemens implements and maintains a change management process for IT systems and applications.	X	X	X
	4.6 Siemens maintains a process to update and implement vendor security fixes and updates on the respective IT systems and applications.	X	X	X
	4.7 Siemens irretrievably erases data or physically destroys the data storage media before disposing or reusing of an IT system.	X	X	X
5. Transmission Controls				
	5.1 Siemens continuously and systematically monitors IT systems, applications and relevant network zones to detect malicious and abnormal network activity by;			
	a) Firewalls (e.g., stateful firewalls, application firewalls);	X	X	-
	b) Proxy servers;	X	X	-
	c) Intrusion Detection Systems (IDS) and/or Intrusion Prevention Systems (IPS);	X	X	-
	d) URL Filtering; and	X	-	-
	e) Security Information and Event Management (SIEM) systems.	X	X	-
	5.2 Siemens documents and updates network topologies and its security requirements on regular basis.	X	X	-
	5.3 Siemens administers IT systems and applications by using state-of-the-art encrypted connections.	X	X	-
	5.4 Siemens protects the integrity of content during transmission by state-of-the-art network protocols, such as TLS.	X	X	-
	5.5 Siemens encrypts, or enables its customers to encrypt, customer data that is transmitted over public networks.	X	X	-
	5.6 Siemens uses secure Key Management Systems (KMS) to store secret keys in the cloud.	X	-	-

#	Measures	Scenario		
		1	2	3
6. Security Incidents				
	Siemens maintains and implements an incident handling process, including but not limited to			
	a) records of security breaches;	X	X	X
	b) customer notification processes; and	X	X	X
	c) an incident response scheme to address the following at time of incident:(i) roles, responsibilities, and communication and contact strategies in the event of a compromise (ii) specific incident response procedures and (iii) coverage and responses of all critical system components.	X	X	X
7. Asset Management, System Acquisition, Development and Maintenance				
	7.1 Siemens implements an adequate security patching process that includes:			
	a) monitoring of components for potential weaknesses (CVEs);	X	X	-
	b) priority rating of fix;	X	X	-
	c) timely implementation of the fix; and	X	X	-
	d) download of patches from trustworthy sources.	X	X	-
	7.2 Siemens identifies and documents information security requirements prior to the development and acquisition of new IT systems and applications as well as before making improvements to existing IT systems and applications.	X	X	-
	7.3 Siemens establishes a formal process to control and perform changes to developed applications.	X	X	-
	7.4 Siemens plans and incorporates security tests into the System Development Life Cycle of IT systems and applications.	X	X	-
	8. Human Resource Security			
	8.1 Siemens implements the following measures in the area of human resources security:			
	a) employees with access to Personal Data are bound by confidentiality obligations; and.	X	X	X
	b) employees with access to Personal Data are trained regularly regarding the applicable data protection laws and regulations	X	X	X
	8.2 Siemens implements an offboarding process for Siemens employees and external vendors.	X	X	X



### Annex III to DPT (and, where applicable, the Standard Contractual Clauses)

#### **List of approved Subprocessors**

The principal provider of the Offering is Brightly Software, Inc. a Delaware USA corporation, 11000 Regency Parkway Suite 300, Cary NC 27518. For providing the Offerings, Brightly Software has engaged the further processors listed below.

#### **Entities engaged in the storage/hosting of content:**

Entity Name	Affected Brightly Offerings	Data Center Location or Country/Region where Processing is performed	Transfer Safeguards in case of Restricted Transfers
Amazon Web Services, Inc.	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Classic SD/FD, Predictor, Confirm, Data Share (for North America customers)	USA	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Amazon UK	Confirm, Predictor, Data Share (for UK customers)	United Kingdom	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Amazon Commercial Services Pty Ltd	Confirm, Predictor (for AUS customers)	Australia	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Amazon Web Services Canada, Inc	Stream (for North America customers)	Canada	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Microsoft SQL Server	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Classic SD/FD, Predictor, Confirm (for all customers)	USA	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Oracle	Asset Essentials, Energy Manager, Event Manager, Origin, Stream, TheWorxHub, Schooldude/Facilitydude	USA	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____

Entity Name	Affected Brightly Offerings	Data Center Location or Country/Region where Processing is performed	Transfer Safeguards in case of Restricted Transfers
Snowflake, Inc.	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Classic SD/FD, Confirm, Predictor, Stream, Data Share	USA (for North America customers), UK (for UK customers)	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____

**Entities engaged in the Processing of Personal Data for non-storage/hosting purposes:**

Entity Name	Affected Brightly Offerings	Description of Processing	Transfer Safeguards in case of Restricted Transfers
Bombora, Inc.	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Clari, Inc.	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Litmos	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Salesforce	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____



Entity Name	Affected Brightly Offerings	Description of Processing	Transfer Safeguards in case of Restricted Transfers
QlikTech Inc.	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management, user authentication services	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Makini	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	Implementation, Professional Services ancillary to cloud services	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Data Dog	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	security monitoring	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Pendo.io	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	usage tracking, cloud services communications	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Okta (Auth0)	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	user management, user authentication	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Aha	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream		<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Virtusa	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	analytics services and development	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____



Entity Name	Affected Brightly Offerings	Description of Processing	Transfer Safeguards in case of Restricted Transfers
Environmental Systems Research Institute Inc.	Predictor	API interfacing, GPS mapping	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Calendly LLC	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Celonis Inc.	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Certinia Inc. f/k/a FinancialForce	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Chorus.ai	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
ChurnZero	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Conga	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____



Entity Name	Affected Brightly Offerings	Description of Processing	Transfer Safeguards in case of Restricted Transfers
Drift.com, Inc.	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Gainsight, Inc.	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
HubSpot	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Jadu	Confirm integration to Jadu	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
LeanData, Inc.	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Marketo	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Microsoft 365/Active Directory	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____



Entity Name	Affected Brightly Offerings	Description of Processing	Transfer Safeguards in case of Restricted Transfers
<b>Microsoft Distributed File System</b>	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
<b>Oracle (NetSuite)</b>	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
<b>Qualified.com, Inc.</b>	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
<b>Recapped, Inc.</b>	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
<b>Reprise, Inc.</b>	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
<b>Salesloft</b>	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
<b>Scalable Software, Inc.</b>	Insight, Help Desk	customer account management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____



Entity Name	Affected Brightly Offerings	Description of Processing	Transfer Safeguards in case of Restricted Transfers
Buzzclan	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	data engineering services	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
GRESB	Stream	data engineering services	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
myDevices, Inc.	Asset Essentials integration to myDevices Offerings	Data interfacing	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Atlassian	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	offering support management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Google	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	offering support management	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Red Hat	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	research and development	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
AuthZed	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	user management, user authentication	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____



Entity Name	Affected Brightly Offerings	Description of Processing	Transfer Safeguards in case of Restricted Transfers
UMS	Energy Manager, Stream	utility bill processing	<input type="checkbox"/> No Restricted Transfer <input type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input checked="" type="checkbox"/> Other: n/a, no EU data transfers
Urjanet (Arcadia)	Energy Manager, Stream	utility bill processing	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Wiz.io	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	security monitoring	<input type="checkbox"/> No Restricted Transfer <input checked="" type="checkbox"/> EU Standard Contractual Clauses <input type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Brightly India	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	research and development	<input type="checkbox"/> No Restricted Transfer <input type="checkbox"/> EU Standard Contractual Clauses <input checked="" type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____
Siemens Egypt	Asset Essentials, Energy Manager, Event Manager, Origin, TheWorxHub, Schooldude/Facilitydude, Confirm, Predictor, Stream	research and development	<input type="checkbox"/> No Restricted Transfer <input type="checkbox"/> EU Standard Contractual Clauses <input checked="" type="checkbox"/> Processor BCR <input type="checkbox"/> Other: _____