

Our privacy commitment

At Visier, protecting our customers' data is our top priority. We are committed to safeguarding the data entrusted to us and have a rigorous and comprehensive Privacy and Data Protection Program in place to ensure we continually adhere to the highest standards of practice. This commitment has always been fundamental to the way we do business.

We have developed this Privacy and Data Protection Info Sheet to inform current and prospective customers about our approach to global data protection and to highlight some of the ways in which we have operationalized our commitment towards robust and transparent privacy management practices.

Accountability

We know that protecting our customers' data is integral to the success of our business. We have a dedicated Privacy team responsible for monitoring developments in global privacy laws and regulations and incorporating the necessary requirements into our overall privacy program as they evolve. Globally recognized privacy principles underpin our program and we strive to meet other applicable standards, codes of conduct, regulatory guidance, and industry best practices.

We believe that accountability for privacy and data protection lies with all team members and we enforce corporate policies and practices designed to protect customer data. All employees complete mandatory Data Privacy, Security, and GDPR training as part of the onboarding process and annually thereafter. Employees provisioned with access to customer data are required to complete additional training. There is a clear understanding that employees share the responsibility for protecting data and are proactively engaged in dialogue on privacy trends, risks, and considerations. Employees are also expected to abide by Visier's Code of Conduct and Ethics, adhere to the provisions of company confidentiality agreements, and follow Visier's corporate policies and procedures.

Privacy and Data Protection Program

Our Privacy and Data Protection Program is responsible for the following:

- Formulating, updating, and communicating internal privacy policies
- Maintaining current and transparent privacy notices including our Privacy Statement (located at <https://www.visier.com/privacy/>) that describes the information we collect and use, for what processing purposes, and how we manage and safeguard it
- Promoting a privacy-aware culture through ongoing education and awareness activities
- Documenting processes and procedures, and issuing guidelines that inform different parts of the business of what they need to know and do
- Data mapping and maintaining Records of Processing Activities (ROPAs)
- Completing internal Data Transfer Impact Assessments (DTIAs)
- Conducting privacy due diligence on vendors, suppliers, and contractors
- Maintaining an up-to-date Sub-processor List
- Undertaking annual, external-led privacy assessments and maintaining our privacy certifications
- Regularly updating and annually testing our data breach response plan
- Ensuring customer data is processed only in accordance with the customer agreement or at the direction of the customer
- Monitoring the data protection landscape and adjusting plans and efforts to ensure our privacy program and practices remain current
- Evolving Visier's Privacy and Data Protection Program using globally recognized privacy accountability frameworks



Privacy by Design

We apply Privacy by Design principles in how we build our products and solutions. Privacy assessments are conducted to proactively identify privacy impacts and requirements during concept and design stages. We partner with Product and Development teams to build functions and features that maximize the value of the data for our customers while offering flexible privacy and security controls to allow customers to choose how data is accessed and used. We look for opportunities to make privacy-enhancing design choices to help comply with legal requirements or to meet best practices. In addition, privacy reviews and approvals are incorporated for all major releases before they become generally available.

Regulatory compliance and certifications

Our Privacy and Data Protection Program is aligned with standards set by today's privacy and data protection laws and regulations including the EU General Data Protection Regulation (GDPR), the UK GDPR, Canada's Personal Information Protection and Electronic Documents Act (PIPEDA), and the California Consumer Privacy Act (CCPA) amongst others. We continually monitor the rapidly evolving privacy landscape including guidance issued by regulatory bodies and supervisory authorities. We adjust our compliance efforts regularly to ensure our privacy program remains up-to-date.

We are an active participant in the TRUSTe Verified International Privacy program which publicly exemplifies our dedication and commitment towards upholding industry-established, internationally-recognized privacy principles and standards.

View our International Privacy Verification here:

<https://privacy.truste.com/privacy-seal/validation?rid=6c03aa06-0835-49d6-a0ae-14301e6e2e5a>

International data transfers

We have long employed two data transfer solutions to support the lawful transfer of data from the EU, UK, and Switzerland to the U.S.—the European Commission-issued (EC) Standard Contractual Clauses (SCCs) and the EU-U.S. and Swiss-U.S. Privacy Shield.

We have chosen to maintain active participation in the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks to demonstrate our commitment towards upholding internationally-recognized privacy principles, but we do not rely on the Privacy Shield as a legal basis for transfers of personal data. Instead, we offer a Data Privacy Addendum (DPA) that incorporates the EC and UK SCCs.

To learn more about the Privacy Shield program and to view real-time verification of our participation, please visit privacyshield.gov/.

Although external verification is not required under the Privacy Shield, we use TRUSTe as our third-party verification agent on an annual basis to independently assess and confirm our compliance with the Frameworks' requirements and to verify that appropriate security safeguards are in place.

View our TRUSTe Privacy Shield Verification <https://privacy.truste.com/privacy-seal/validation?rid=87c6a311-5c42-4595-bab1-fd239f78c984>.

Conclusion

We value the trust that our customers place in us and continuously aspire to foster our customers' confidence in our products, solutions, and services.

To learn more about our privacy and data handling practices, read our Privacy Statement at: visier.com/privacy/, and visit our Trust site at: visier.com/trust/.

We want to ensure that we meet the privacy commitments made to our customers. If you have any questions, please contact us at: privacy@visier.com.