make

Whitepaper
Data Privacy

"Trust takes years to build, seconds to break and forever to repair."

We strongly believe in the importance of handling Personal Data in a thoughtful way and aim to build a software that supports our customers in complying with internal privacy policies and applicable regulations.

This commitment goes beyond the privacy space. Our Code of Conduct & Ethics outlines the values which all of us are required to uphold. Please find more information here: https://www.celonis.com/ethics-compliance/.

For detailed information on our data privacy and information security efforts, please take a look at our website: https://www.make.com/en/security.

Terms and their definitions vary between privacy regulations, let's align on the definitions for the purpose of this document:

"Personal Data"
shall mean any personal information relating, directly or indirectly, to an identified or identifiable natural person.

"Data Subject"
shall be an individual (natural person) whose Personal Data is processed, e.g., a consumer or employee.

"Processing"
shall mean any action which is performed on Personal Data, such as collecting, transferring, storing, using, or erasing.

"Controller"
shall be the organization that determines the purposes and means of the processing of the personal data in scope and that is responsible for compliance with legal obligations.

"Processor"
shall be the organization that processes Personal Data on behalf of the Controller and that is obliged to support the Controller as described within the Data Processing Agreement.

Our Privacy Program oversees compliance with applicable privacy regulations and standards:

Privacy & Security Program
We have implemented both an Information Security Management System (ISMS) according to ISO 27001 and a Personal Information Management System (PIMS) according to ISO 27701.

Confidentiality
Employees are required to sign non-disclosure agreements and adhere to our stringent privacy and security policies as a condition of their employment.

Privacy Policy
The importance of data privacy, the components of our Program as well as the related key processes are described in our Global Privacy Policy.

Employee Trainings
All employees must complete annual trainings on privacy and information security. Participation is tracked within the e-learning system.

Audits & Certifications
We periodically conduct internal and external audits, supplemented by self-assessments.

Privacy Roles & Responsibilities
A dedicated internal Data Privacy Team maintains and further develops our Privacy Program.

Following key processes are at the core of our Privacy Program:

Supplier Management
Critical suppliers are carefully selected and re-assessed on a regular basis. Data Processing Agreements and/or Standard Contractual Clauses are concluded if applicable.

Privacy Register
If required by applicable laws, data mapping such as "records of processing activities" (incl. details on processed data categories, purposes and data flow) are documented.

Risk Assessments
Privacy Impact Assessments (PIA) and Data Transfer Impact Assessments (DTIA) are performed for critical processes and mitigation measures are implemented if required.

Security Incidents & Personal Data Breaches
Processes have been defined to identify, assess, document, handle, and, if required, communicate Personal Data Breaches to both authorities and our customers in line with applicable laws and contractual obligations.

Data Subject Requests
Incoming requests from Data Subjects are centrally managed by the internal Data Privacy Team.

What is make?

Make is the leading visual platform for anyone to design, build, and automate anything - from tasks and workflows to apps and systems - without the need for coding skills. Make allows to build workflows with various outcomes and process multiple records, collectively or separately.

You are able connect all your favorite apps on Make with just a few clicks in order to configure the wished APIs. You are in full control on which APIs to configure.

As the EU General Data Protection Regulation (GDPR) is seen to be one of the strictest privacy regulations in the world, we have designed our software according to the concept of "Data Protection by design and default" (Art. 25).

Selected Privacy by Design features of make:

Contractual set-up
We act as Processor and offer to conclude a Data Processing Agreement (and Standard Contractual Clauses as needed).

Data Hosting & Sub-contractors
Hosting location of the customer's instances can be selected by the customer. Hosting in the EU is offered. The full list of sub-processors is available on www.make.com.

Data Deletion
Data of the execution logs are deleted after 60 days for enterprise plans and 30 days for others.

Access restrictions
Advanced role and team management functions within an organization's profile. Enterprise customers have the option to use their own SSO implementation.

Encryption and Key Management
We use full-disk encryption within the industry-standard AES-256 encryption algorithm and AWS Key Management Service (KMS) for managing cryptographic keys.

Legal disclaimer

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