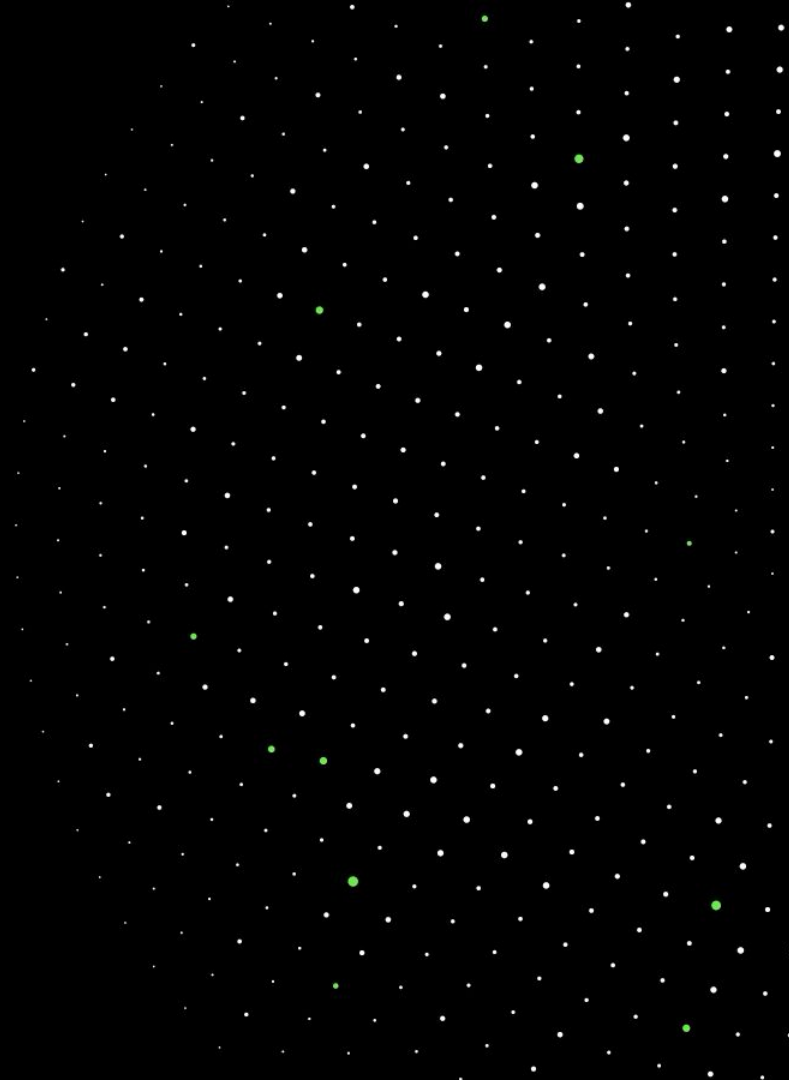




Whitepaper

Data Privacy

As of October 2022



Introduction (1/2)



“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 in line with applicable data privacy and data protection regulations.

We aim to build a software that supports our customers in complying with internal privacy policies and applicable data protection legislation.

This commitment goes beyond the privacy space. Our Code of Conduct and Ethics outlines the values which all of us at Celonis are required to uphold.

For detailed information on our data privacy and information security efforts, please refer to www.celonis.com/trust.

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Introduction (2/2)



As terms and their definitions vary between privacy regulations, let's align on the definitions as described within the EU General Data Protection Regulation (EU GDPR) 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.

Privacy at Celonis (1/2)



The Celonis Privacy Program oversees Celonis' compliance with applicable privacy regulations:

Privacy & Security Program

Celonis has implemented both an Information Security Management System (ISMS) according to ISO 27001 and a Personal Information Management System (PIMS) according to ISO 27701.

Celonis Privacy Policy

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

Audits & Certifications

We periodically conduct internal and external audits, supplemented by self-assessments. Our multiple certifications are available on www.celonis.com/trust.

Privacy Roles & Responsibilities

A dedicated internal Data Privacy Team maintains and further develops the Celonis Privacy Program. An external Data Protection Officer has been appointed for Celonis SE, our parent company in Germany.

Employee Trainings

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

Confidentiality

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

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Privacy at Celonis (2/2)



There are several key processes that are at the core of the Celonis 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 signed 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.

Data Subject Requests

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

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.

Risk Assessments

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

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Privacy and EMS (1/2)



The Celonis software Execution Management System (EMS) enables companies from all industries to optimize their business processes as well as to control them intelligently.

Processes typically run across multiple technology platforms, which reduces transparency and creates inefficiencies. EMS generates an automated x-ray of how business processes truly run.

To enable such “process mining,” **event data** from **source systems** (e.g., ERP-system) is analyzed within EMS. The customer decides which types of event data from which source systems are extracted and uploaded to the cloud solution EMS.

The Customer is also in **full control of any Personal Data** uploaded to EMS. Furthermore, before uploading personal data, pseudonymization and anonymization filters can be applied by the customer.

Overall, EMS is highly configurable and can be set up by the customer according to specific use-cases and individual requirements.

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).

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Privacy and EMS (2/2)



Multiple built-in security and privacy features are offered, such as:

Encryption

Data is encrypted in transit via HTTPS using TLS 1.2 or higher, and at rest using AES-256 encryption

Login Security

Comprehensive authorization protocols (incl. SSO, IP restrictions, and multi-factor authentication)

Confidentiality

Configurable role-based access and data permissions incl. tamper-proof audit log and optional login history log

Data Minimization

EMS Extractor to only select data categories that are required for the specific purpose for the upload to EMS

Anonymization and Pseudonymization

Configurable filters for anonymization and pseudonymization (e.g., by hashing via Secure Hash Algorithms) of personal data

Data Deletion

Configurable deletion procedures available (e.g. for retention times of log-files or anonymization of user accounts)

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Data Transfers



Since the invalidation of Privacy Shield on July 16, 2020 by the CJEU through the ruling C-311/18 “Schrems II”, Celonis relies on the new **Standard Contractual Clauses** (SCC) for Third Country Data Transfers.

Hosting location of the customer’s EMS instance can be selected by the customer. Data for European customers is hosted in the European data centers of our **hosting providers**, unless otherwise agreed. The list of all sub-processors is published on www.celonis.com/terms-and-conditions.

Tickets to **Customer Support** may be answered by Celonis employees from several Celonis locations, mainly Germany, Spain, USA and Kosovo. This means that access to the (personal) data contained in the ticket may occur from other countries. The ticketing tool itself is hosted in Germany. Data Transfer Impact Assessments (DTIA) have been conducted for providing Support Services from personnel in the US and Kosovo.

Celonis has not yet received any access requests by government authorities, but should any such requests be received in the future, Celonis will provide any affected customer prompt written notice of the request, unless prohibited by law.

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Additional Information



[Celonis Trust Center](https://www.celonis.com/trust-center) - www.celonis.com/trust-center

- General Information on Data Privacy and Information Security
- Whitepapers
- Certificates & Frameworks

[Celonis Terms and Conditions](https://www.celonis.com/terms-and-conditions) - www.celonis.com/terms-and-conditions

- Data Processing Agreement
- List of Sub-Processors
- Technical & Organizational Measures
- Standard Contractual Clauses

[Celonis Privacy Notice](https://www.celonis.com/privacy-policy) - www.celonis.com/privacy-policy

[Celonis Code of Conduct and Ethics](https://www.celonis.com/conduct) - www.celonis.com/conduct

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Thank you!

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