V 1.0

GibbsCAM Software Privacy Notice

Introduction and scope of this Privacy Notice

*This Privacy Notice is issued with reference to the specific personal data processed about individual end-users who have access to the software and/or services provided by Cimatron Gibbs LLC to a company/Licensee under the End-User License Agreement (and Supplemental Terms) of the GibbsCAM software (**Software and/or Services**). For information about how GibbsCAM processes your personal data beyond the scope of this Privacy Notice, please see the general privacy statement available on the following webpage: https://www.gibbscam.com/en/about-this-site/privacy/privacy-statement.*

Cimatron Gibbs LLC (**we** or **GibbsCAM** or **Licensor**) is the data controller of all personal information that we process about you as an individual end user within the scope of this Privacy Notice.

The integrity of your personal data is vital for GibbsCAM and its group, and therefore, we welcome the extra transparency and protection of your personal data that the General Data Protection Regulation (GDPR) and any other applicable data privacy legislation requires.

What types of personal data we collect

GibbsCAM will collect the following information about you via its Software and/or Services:

1. User name and log-in information;
2. Email addresses and other contact information;
3. The company/organisation that you work for/represent and your department;
4. Usage and event data (such as how you use our Software and/or Services);
5. Location data (including your IP address and Wi-Fi network);
6. Machine data (such as the computer or device on which you are using our Software and/or Services); and
7. GibbsCAM Copilot chatlog including data and time and content of prompts/questions asked by you and the related output generated by our AI chatbot.

Where we get it from

GibbsCAM obtains personally identifiable information from you when you log-in to your account, when you use our Software and/or Services and/or when you communicate with us (including prompts/questions asked by you in the GibbsCAM Copilot). The information may be volunteered by you, or collected from cookies and other tracking software which support our Software and/or Services.

Our legal grounds and purposes of processing

We will have a lawful basis for processing your information if processing is necessary for the purposes of legitimate interests pursued by us or by a third party. We make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don't automatically override yours and we won't use your information if we believe your interests should override ours, unless we have other grounds to do so (such as your consent or where we are under a legal obligation). If you have any concerns about our processing please refer to the "Your Rights" section below.

We consider that it is **in our legitimate interests** to:

1. Identify you as an authorised end-user of our Software and/or Services;
2. Help you to navigate and use our Software and/or Services efficiently;
3. Identify and monitor any unauthorised use, or misuse, of our Software and/or Services;
4. Continually improve our Software and/or Services and keep them up-to-date; and/or
5. Send you promotional emails about our Software and/or Services.

You can opt-out of receiving our promotional emails at any time.

Who it is shared with

GibbsCAM does not sell personal information to any other organization.

GibbsCAM may share your personal information with the following types of organizations for the routine conduct of its business:

1. The members of our group;
2. The customer/Licensee on whose behalf you are acting;
3. Our IT service providers/partners, including those: (a) who help us analyse, license and manage our Software and/or Services; and (b) those who power the GibbsCAM Copilot;
4. Our third party compliance/anti-piracy providers; and/or
5. Our marketing providers.

These businesses are only authorized to use the information provided by GibbsCAM for specific purposes in line with this Privacy Policy. GibbsCAM does not authorize third parties to use the information for any other purpose.

International Transfers

GibbsCAM is a US-based company. Your personal data is transferred to entities located in Europe and to other entities in the USA, and may also be transferred to

other global territories such as the UK, Switzerland and India. However, we will only do so where:

1. The required country guarantees the treatment of personal data to the same standard as the EU (e.g. the UK);
2. Appropriate safeguards have been put in place which meet the requirements of the Article 46 of the GDPR, for example, using the EU Commission's Standard Contractual Clauses for transfers of personal data to providers outside the EU or UK, together with any supplementary export measures; or
3. One of the exceptions for specific situations under Article 49 of the UK GDPR together with any supplementary export measures applicable to the transfer.

Security

We adopt robust technologies and policies to ensure the personal information we hold about you is suitably protected. We take appropriate technical and organisational measures to protect your information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

Retention of your information

We will not retain your information for any longer than we think is necessary.

When determining the relevant retention periods, we will have regard for factors including: our contractual obligations (including the duration of those contractual obligations) in respect of the information in question; legal and regulatory obligations under applicable law; statutes of limitations under applicable law; our legitimate interests; (potential) disputes; and guidelines issued by relevant data protection authorities.

User name and log-in data, email addresses, company names, usage and event data, location data and machine data will be retained for the period of our contract with the customer/Licensee on whose behalf you are acting.

Chatlog data and user data will be retained for approximately 6 months following which it is deleted or anonymized.

Where we have suspicions of unauthorised use, or misuse, of our Software and/or Services, we may retain such personal data for longer periods in connection with the pursuit or defence of legal claims.

Your rights

Under data protection law, you have a number of rights concerning the personal information we hold about you. If you wish to exercise any of these rights, please make your request via the applicable data request forms available via GibbsCAM Data Privacy Portal: **https://www.gibbscam.com/en/about-this-site/privacy**
For additional information on your rights please see below.

1. **The right to be informed**. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Notice.
2. **The right of access**. You have the right to request certain information about, access to and copies of your personal information (if we are processing it). Please note that you are entitled to request one detailed summary of that personal information at no cost, but for any further costs we reserve the right to charge a reasonable fee based on administration costs.
3. **The right to rectification**. You are entitled to have your information corrected if it is inaccurate or incomplete.
4. **The right to erasure**. This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of certain of the information that we hold about you. However, please note that this will not apply if we are required to retain the information for compliance with a legal obligation.
5. **The right to restrict processing**. You have rights to request that we stop using your personal information or limit the way in which we use it. When processing is restricted, we can still store your information, but will not use it further.
6. **The right to data portability**. You have the right to request that we return your personal information in an accessible and transferrable format, or that we send it directly to another company, where technically feasible;
7. **The right to lodge a complaint**. You have the right to lodge a complaint about the way we handle or process your information with your national data protection authority.
8. **The right to withdraw consent**. If you have given your consent to anything we do with your information (i.e. where we rely on consent as a legal basis for processing your information), you have the right to withdraw that consent at any time. Please note this may impact our ability to provide services or to otherwise continue our relationship with you.
9. **The right to object to processing**. You have the right to object to certain types of processing where we use it for our legitimate interests or for marketing purposes.

Contact details

If you have any queries or requests concerning this Privacy Notice or how we handle your personal data more generally, please send an email to info@gibbscam.com.