

Applied Flow Technology Software Privacy Statement

At Applied Flow Technology (“AFT”, “we” or “us”), trust is one of our core values. This Privacy Policy (“Privacy Policy”) describes our privacy practices. Please read this Privacy Policy carefully to learn how we collect, use, share and otherwise process information obtained from your use of and interaction with AFT’s Software products (“Software”), including information relating to individuals (“Personal Data”), and your rights and choices regarding our processing of your information and Personal Data (collectively, “Data”). By using the Software, you consent to such collection of Data, as well as its transmission and use as permitted by this Agreement.

Data We Collect

We collect Personal Data and anonymous non-Personal Data (data which cannot be used to identify an individual) only for our legitimate business purposes as described below in “Data Usage”. Some of this Data is required for Software Entitlement Management (“Required Data”), as more fully described below in “Types of Data”, while other types of Data collection can be limited by you as described below in “Opt Out of Data Transmission”.

Types of Data

To enable secure Entitlement Management and proper Software functionality, the following non-Personal “Required Data” may be collected, including:

- Operating system
- CPU type and number of cores
- Memory
- IP Address of the Internet gateway
- Device name and form factor
- Number of calls to Application Programming Interface (“API”)

In addition, we collect other non-Personal Data relating to your use of the Software (“Software Usage Data”), such as, but not limited to:

- Software features used
- Aggregate count of Software objects in use
- Internal or user facing warnings or error messages
- Software run time for computational tasks

We may collect Personal Data from you only with your request and consent. Such Personal Data may include items such as:

- Name
- Title
- Company Name
- Email Address
- Phone Number
- Computer User Name

Data Usage

We will only use your Personal Data to contact you and to provide you with the Software and related services.

We may use the anonymous non-Personal Data we collect to:

- Validate and authenticate your license usage.
- Confirm and verify that your usage of Software is in compliance with the [AFT License Agreement](#).
- Manage Entitlement
- Improve our products and services based on aggregated Software Usage Data

No Data will be sold, in whole or in part, to a third party.

Data Storage and Security

All Data held by us will be held in our servers based in the United States of America which are maintained by US staff in a private, not public, cloud. Applied Flow Technology is committed to protecting the security of your information and uses a variety of security technologies and procedures to help protect the Data from unauthorized access, use, or disclosure.

We take precautions including organizational, technical, and physical measures, to help safeguard against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, the Data we process or use.

While we follow generally accepted standards to protect your Data, no method of storage or transmission is 100% secure. You are solely responsible for protecting your password, limiting access to your devices, and signing out of applications after your sessions. If you have any questions about the security of Data, please contact us.

Opt-Out of Data Transmission

Required Data is necessary for Entitlement Management.

You may opt-out of the collection of Software Usage Data or Personal Data at any time by notifying us of this election in writing. In some cases, you may be required to update your Software to exercise this election.

With whom do we share your Data?

We may share your Data with the following recipients:

Our contracted channel partners which provide us with services such as marketing, sales, technical support, and training. Such service providers comprise companies located in the countries in which we are represented as listed here: <https://www.aft.com/channel-partners/channel-partner-locations>.

We may also share your Data with other partners and service providers to the extent this is necessary to fulfill a request you have submitted via our websites, or for customer support, technical operations and account management purposes.

We may also share your Data with our affiliates, including [Purple Mountain Technology Group](#), when your needs match a service they provide.

International Transfer of Data

Your Data may be collected, transferred to and stored by us in the United States and by our channel partners in other countries where we are represented. AFT channel partners have a legal, contractual relationship with us wherein they provide sales, technical support and training on our behalf.

Therefore, your Data may be processed outside the US, including in countries which are not subject to an adequacy decision by the European Commission and which may not provide for the same level of data protection as in the US and EEA. In all cases, we have a legal agreement with each channel partner stating they will only use your data to conduct business transactions on our behalf and will not sell or share your data to third parties.

AFT is the controller of your Personal Data and responsible for the collection, processing and disclosure of your Personal Data as described in this Privacy Policy, unless expressly specified otherwise.

How Long Do We Keep your Data?

We retain your Data so long as we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your Data, we will either delete or anonymize it or, if this is not possible (for example, because your Data has been stored in backup archives), then we will securely store your Data and isolate it from any further processing until deletion is possible.

You may request for us to delete your Data at any time by contacting us as described below.

Your Data Rights

You have certain rights regarding your Data, subject to local data protection laws. These may include the following rights:

- to access your Data held by us (right to access);
- to rectify inaccurate Data and ensure it is complete (right to rectification);
- to erase/delete your Data to the extent permitted by other legal obligations (right to erasure; right to be forgotten);
- to restrict our processing of your Data (right to restriction of processing);
- to transfer your Data to another controller to the extent possible (right to data portability);
- to object to any processing of your Data carried out on the basis of our legitimate interests (right to object). You can exercise your right to object at any time to such processing without having to provide any specific reason for such objection;
- to the extent we base the collection, processing and sharing of your Data on your consent, to withdraw your consent at any time, without affecting the lawfulness of the processing based on such consent before its withdrawal.

How to Exercise Your Rights

To exercise your rights, please contact us. We try to respond to all legitimate requests within one month and will contact you if we need additional information from you to honor your request.

Changes to this Privacy Policy

We will update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements and other factors. If we do, we will update the “effective date” at the end of this Privacy Policy. If we make an update, we may provide you with notice prior to the update taking

effect, such as by posting a conspicuous notice on our website or by contacting you using the email address you provided.

We encourage you to periodically review this Privacy Policy to stay informed about our collection, processing and sharing of your Data.

Contact Us

To exercise your rights regarding your Data, or if you have questions regarding this Privacy Policy or our privacy practices, please complete our contact us form or mail us at:

Applied Flow Technology - Data Protection Manager

2955 Professional Place, Suite 301

Colorado Springs, CO 80904 USA

Email: info@aft.com

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, and you are in the EEA, you have the right to lodge a complaint with the competent supervisory authority.

Last Updated May 2024