

# Privacy and Security

Aspen Technology is committed to protecting the privacy and security of your personal data.

**Effective Date:** May 16, 2018

**Last Updated:** October 1, 2020

Aspen Technology (“**AspenTech**”) is providing this Privacy and Security Policy (“**Privacy Policy**”) to inform you of our privacy and security practices, including the choices you can make about how we collect and use your personal information.

This Privacy Policy applies to customers, potential customers, vendors, job applicants and other interested individuals. AspenTech has separate policies that apply to current and former employees and workers.

This Privacy Policy applies to any of AspenTech’s websites, as well as to information that we collect off-line, such as through product registrations, call centers, tradeshow or seminars, unless otherwise set forth in a separate agreement between you and AspenTech.

If you have difficulty accessing or reading this Privacy Policy, you may download a PDF version [here](#).

## Privacy Compliance Information, Including GDPR

AspenTech intends to comply with our legal obligations under international data privacy and security laws and regulations, including the EU General Data Protection Regulation (GDPR) which imposes rules on controlling and processing personal data.

AspenTech needs to gather and use information or ‘data’ about you as part of our business and to manage our relationship with you, possibly including some personal data.

## Data Controller

For the information we collect from you, AspenTech is the data controller. AspenTech’s Chief Information Officer maintains executive oversight of our company’s Privacy Policy.

### Mailing address:

Attn: Chief Information Officer  
Aspen Technology, Inc.  
20 Crosby Drive  
Bedford, Massachusetts 01730  
United States

## Personal Information That We Collect

On some of our webpages, you can request information, subscribe to marketing or support materials, register for events, sign up for online or in-person trainings and webinars, apply for jobs, provide

feedback or obtain technical support. The types of data you provide to us on these pages may include name, address, phone number, email address, user IDs and passwords, and contact preferences.

AspenTech collects and analyzes web site usage information; that may include the pages visited on the AspenTech websites, unique URLs visited, browser type, device type, network provider and IP address. Most usage information is collected via cookies or other analysis technologies. AspenTech's web pages use cookies, web beacons, and other technologies for data analysis and personalization services. See below for more information about our use of cookies.\*

Except for job applicants (see below), AspenTech does not generally collect "special categories" of personal data (as defined under GDPR). However, we may collect your photo for legitimate purposes, such as security or in some cases we may collect dietary information if we host events.

For job applicants, we may lawfully collect special categories of data such as race, ethnic origin, or gender (in accordance with applicable laws and regulations).

### **Lawful Basis and Legitimate Interests**

AspenTech will process your personal data in accordance with our privacy obligations under applicable data privacy laws and regulations, including GDPR, and we will only do so in performing contracted services, complying with any legal obligation, or when we have a legitimate interest.

Examples of how we use your personal data:

- Understanding your preferences and providing marketing and promotional materials
- Organizing and conducting events
- Contacting you regarding your interest in events, trainings and webinars or related content that you have registered for
- Administering surveys to improve our products and services
- Providing goods and services that have been contracted for
- Communicating with you about our services, including order management and billing
- Reviewing job applicant credentials and making hiring decisions
- Providing technical support on AspenTech products
- Preventing, detecting and fighting fraud or other illegal or unauthorized activities
- Running our business and planning for the future
- For any other legitimate interest

We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

### **Sharing Your Personal Data**

Sometimes we might share your personal data with our group companies or our contractors, service providers and agents to carry out our obligations under our contract with you or for our legitimate interests.

We may transfer your information, if we are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control.

Applicable law may require us and our service providers to disclose your information if: (i) reasonably necessary to comply with a legal process, such as a court order, subpoena or search warrant, government investigation or other legal requirements; or (ii) necessary for the prevention or detection of crime (subject in each case to applicable law).

We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our users, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

We may ask for your consent to share your information with third parties. In any such case, we will make it clear why we want to share the information.

We may also use and share usage information that, by itself, does not identify who you are (such as device information, general demographics and behavioral data). We may combine this information with additional information collected from other sources.

When we share information, we require those companies and other entities to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

### **Cross-Border Data Transfers**

Our use of information subject to this Privacy Policy sometimes involves cross-border data transfers. As an example, personal data of users located in the European Economic Area (“**EEA**”) may be transferred to the U.S. or other jurisdictions. We use standard contract clauses approved by the European Commission or other adequate mechanisms to legitimize data transfers from the EEA to other countries. Standard contractual clauses are commitments between companies transferring personal data, binding them to protect the privacy and security of your data.

### **Links to Third-Party Web Sites**

Our websites may provide links to third-party websites for your convenience and information. If you access those links, you will leave the AspenTech websites, and we do not control those sites or their privacy practices, which may differ from ours. We do not endorse or make any representations or undertakings about third-party websites. The personal data you choose to give to unrelated third parties is not covered by this Privacy Policy. We encourage you to review the privacy policy of any company before submitting your personal data.

### **Your Privacy Rights**

Applicable data privacy laws and regulations, (including GDPR), may afford you certain rights, including the right: (i) to know what personal data we hold about you and to request copies of such data; (ii) to review, update and request that we stop using or delete personal data that is inaccurate or processed in a non-compliant manner; (iii) to unsubscribe from direct marketing emails and to request that we stop processing your personal data for direct marketing purposes; (iv) to request data portability; (v) to request that we restrict the processing of your personal data; (vi) to the extent our processing of your personal data is based on your consent, to withdraw your consent; (vii) in certain circumstances, to object for legitimate reasons to the processing of your personal data.

In certain jurisdictions, including countries in the EU, EEA and the United Kingdom, you have a right to lodge a complaint with the appropriate data protection authority regarding any non-complaint processing by us of your personal data.

**To learn more about California privacy rights, visit [“Privacy Policy for California Residents”](#)**

To protect your privacy and the security of your data, we may ask you to verify your identity in accordance with our identity verification procedures. In some cases, we might ask you to provide additional information for verification purposes before we let you access or update your information. We may reject requests for certain reasons, including: if we cannot verify your identity; the request is unlawful; or if it may infringe on trade secrets, intellectual property or privacy of another user. Also, we may not be able to accommodate certain requests to rectify or object to the processing of personal data, notably where such requests would not allow us to provide our service to you.

### **Exercising Your Rights**

You may exercise your rights by submitting a “subject access request” (“SAR”) related to the information AspenTech holds about you. Please indicate which right are you exercising in the request with the corresponding data privacy law or regulation. We need to know your full name and email address (if different) associated with AspenTech in order to initiate the SAR process. Please note additional information may be requested to verify your identity.

Send your request to:

Job applicants: [esar@aspentech.com](mailto:esar@aspentech.com)

All others: [csar@aspentech.com](mailto:csar@aspentech.com)

We respond to all requests we receive from individuals wishing to exercise their data privacy rights in accordance with applicable data privacy laws and regulations. If you submit a SAR, AspenTech will respond within a reasonable time-frame unless the request is complex or numerous, in which case the period in which we must respond can be extended; AspenTech will promptly notify you if the response needs to be extended.

Applicable data privacy law or regulation may provide certain restrictions on the extent to which these rights may be exercised. If a restriction applies, AspenTech will respond to your request with an explanation of what action will be taken, to the extent required under applicable data privacy law and/or regulation.

There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive, we may charge a reasonable administrative fee or refuse to respond to your request.

### **California Residents**

If you are a California resident, California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our website to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes.

Send your request to:

Job applicants: [esar@aspentech.com](mailto:esar@aspentech.com)

All other: [csar@aspentech.com](mailto:csar@aspentech.com)

**If you are a California resident, California law may provide you with specific rights regarding our use of your personal information. To learn more about your California privacy rights and read the required privacy policy information under the CCPA, visit “[Privacy Policy for California Residents](#)”.**

### **Do Not Track (DNT) Disclosure**

Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. We do not acknowledge Do Not Track browser settings or signals. For information about Do Not Track, please visit: [www.allaboutdnt.org](http://www.allaboutdnt.org).

### **How We Protect Your Information**

We use physical, technical and organizational measures designed to protect your information against unauthorized access, theft and loss.

You are responsible for maintaining the security of your account and the information in your account. We may suspend your use of all or part of the services without notice if we suspect or detect any breach of security.

### **Retaining Your Information**

We keep your personal data for legitimate business purposes and as permitted by applicable laws and regulations. For example, we must keep personal data to prove our compliance with applicable laws and regulations or when an outstanding issue, claim or dispute requires us to keep the relevant information until it is resolved.

### **Children’s Privacy**

We do not knowingly collect personal data from children under age 18. If you know that a user is under the age of 18, notify us via: [PrivacyInfo@aspentech.com](mailto:PrivacyInfo@aspentech.com)

### **Privacy Policy Changes**

From time to time, we will update this Privacy Policy when any material changes take effect. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

### **How to Contact Us**

For Questions about AspenTech’s Privacy Policy, please contact us at:

[PrivacyInfo@aspentech.com](mailto:PrivacyInfo@aspentech.com)

If you believe that your account or information is no longer secure, please notify AspenTech's information Security group at:

[Security@aspentech.com](mailto:Security@aspentech.com)

You can also mail your questions or requests to:

Attn: Chief Information Officer  
Aspen Technology, Inc.  
20 Crosby Drive  
Bedford, Massachusetts 01730  
United States

## **\* COOKIES AND OTHER DATA COLLECTION TECHNOLOGY**

### ***What are cookies?***

Cookies are small text files that are sent to or accessed from your web browser or your computer's hard drive. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the "lifetime" of the cookie (i.e., when it expires) and a randomly generated unique number or similar identifier. A cookie also may contain information about your computer, such as user settings, browsing history and activities conducted while using our services

Web beacons (also called pixel tags or clear GIFs) are another type of data collection technology. A web beacon is computer code that enables user activity and website traffic monitoring.

To learn more about cookies and web beacons, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### ***Are there different types of cookies?***

#### *First-party and third-party cookies*

First-party cookies are placed on your computer or mobile device directly by a company through its website. For example, we may use first-party cookies to apply personalization elements to our website and to better understand your use of our website. Third-party cookies may also be placed on your device by our partners and service providers. For example, we use third-party cookies to measure user numbers on our website. In particular, we use Google Analytics to help collect and analyze certain information for the purposes discussed below. For more information on Google Analytics, visit Google's information [page](#). You may opt out of the use of cookies by Google Analytics [here](#).

#### *Session and persistent cookies*

Session cookies only last until you close your browser. We use session cookies for a variety of reasons, including to learn more about your use of our website during a single browser session and to help you to use our website more efficiently. Persistent cookies have a longer lifespan and aren't automatically deleted when you close your browser. These types of cookies are primarily used to help you quickly sign-in to our website again and for analytical purposes.

### ***Why do we use cookies?***

We use cookies to provide, secure and improve our services. For example, cookies remember your preferences and recognize you when you visit our website. To provide a better user experience, we also may link information from cookies with other data we hold about you. When you visit our websites, some or all of the following types of cookies may be set on your computer or device:

Types of Cookies	Description
<b>Essential website cookies</b>	These cookies are strictly necessary to provide you with services available through our website and to use some of its features, such as access to secure areas.
<b>Analytics cookies</b>	These cookies help us understand how our website is being used, the effectiveness of our marketing campaigns, and how we can customize and improve our websites for you.
<b>Advertising cookies</b>	These cookies are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, and selecting advertisements that are based on your interests.
<b>Social networking cookies</b>	These cookies are used to enable you to share pages and content that you find interesting on our website through third party social networking and other websites. These cookies may also be used for advertising purposes too.

***How can you control cookies?***

Some web browsers provide settings that allow you to control or reject cookies or to alert you when a cookie is placed on your computer. The procedure for managing cookies is slightly different for each internet browser. You can check the specific steps in your browser’s help menu. Please note that changes you make to your cookie preferences may make browsing our websites less satisfying or you may not be able to use all or part of the features on our website. You may opt out of the use of cookies by Google Analytics [here](#).