

1 Our GDPR Compliance and Accountability

The General Data Protection Regulation (GDPR) of the European Union (EU) from 2018 requires that every organization, including Trimble, processing the personal data of people in the EU complies with the requirements of the regulation.

We at Trimble take the privacy of Tekla customers and end users seriously. The GDPR offers a good framework for privacy safeguards that help to control the usage of personal data belonging to customers and their employees. These people are called data subjects in the GDPR.

To demonstrate our compliance with the GDPR as well as to meet the general best practices in both data privacy and information security, we document and periodically review the processing of personal data that we do. We also work to continuously improve our conduct and processes. This paper is a general level summary of the documentation we keep about the measures taken to make sure the privacy of your data is protected. You can find more information on both security and privacy in our Security Center: <https://www.tekla.com/tekla-trust-center>

2 Your Data Is Secure with Us

Our organization has clear processes for software development and maintenance throughout the lifecycle of the software, taking data privacy and information security into account. We ensure that our personnel working with software development has sufficient competence in those areas.

The GDPR features a principle called Privacy by Design. Privacy by Design is a part of the normal product development process whereby the use of personal data is planned at a sufficient level. The risks related to the collection and use of the personal data are assessed during the development phase of the software, and sufficient risk-based measures are planned.

Based on the GDPR, when planning the risk assessment and the related measures, for example, the following topics should be covered: identifying the legal basis, purpose, and means of the personal data processing, ensuring sufficient information security of the personal data, and designing the necessary processes for fulfilling the rights of the data subjects.

We enter into Data Processing Agreements with our partners and subcontractors. The agreements outline the responsibilities of both parties and cover multiple topics of importance such as data transfers to third countries, requests by the data subjects and information security measures.