

Online Privacy Statement

Last Updated: March 27, 2020

Adaptive Insights, a wholly-owned subsidiary of Workday, Inc., is committed to protecting your personal data.

This Privacy Statement describes Adaptive Insights' collection, use, disclosure, transfer, and storage of your personal data as a visitor to adaptiveinsights.com or other Adaptive Insights websites that link to this Privacy Statement ("Sites"). This Statement also applies to marketing events as well as business account management. This Statement describes your choices and rights related to your personal data.

For the purposes of this Statement we refer to "Adaptive Insights," as "we" or "us" when discussing the collection, use, and disclosure of personal data.

The controller of your personal data is Workday, Inc.

Quick links

We recommend that you read this Privacy Statement in full to ensure you are fully informed. However, if you only want to access a particular section of this Privacy Statement, you can click on the relevant link below to jump to that section:

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What does Adaptive Insights do?

Adaptive Insights is a leading provider of cloud-based software for everyone in an organization who plans. Our platform—the Adaptive Insights Business Planning Cloud—transforms business planning into a strategic and competitive advantage by enabling organizations to respond to changing business conditions with confidence and agility. The Adaptive Insights Business Planning Cloud allows customers to rapidly and effectively model their businesses, monitor and analyze performance on an ongoing basis, and generate and share reports and dashboards. In addition, customers can use our Business Planning Cloud to evaluate actual performance versus plan, test alternative scenarios, and leverage insights derived from analytics and to make informed, timely decisions that drive future results. We are headquartered in the U.S., with subsidiaries in the UK and elsewhere. We sell to customers in over 50 countries.

For more information about Adaptive Insights, please see the “About” section of our website at <https://www.adaptiveinsights.com/about/our-company>.

For more information about the data Adaptive Insights collects when you use the Adaptive Insights Business Planning Cloud (the “Service”), please review the [Workday Service Privacy Statement](#).

What personal information does Adaptive Insights collect and why?

The personal data that we collect falls broadly into the following categories:

Data that you provide voluntarily

Certain parts of our Sites and Services may ask you to provide personal data voluntarily. The personal data that you are asked to provide and the reasons you are asked to provide it will be made clear to you at the point we ask you to provide your personal data. For example:

- We require registered customers who use the Services offered on our Sites to give us contact details. This may include name, job title, department, company name, address, phone number, billing information, and email address. We may also ask for additional information about your company. We use this information to create an account so we can set up the Services for individuals and their organizations. We may also use this information to contact users to further discuss customer interest in Adaptive Insights and its products and services and to send information such as newsletters, promotions, and Adaptive Insights events.
- If you subscribe to marketing communications and/or submit inquiries, we may also ask you to provide contact details such as your name, email address, business phone number, and job title.
- If you indicate that you wish to receive information about Adaptive Insights and our products or services, we collect contact details, such as your name, title, company name, address, phone number, email address, and certain company information. We use this data to provide you with information about the products and services we provide and to send information such as newsletters, promotions and events regarding Adaptive Insights.
- If you register to attend an Adaptive Insights-sponsored event, we require certain information including your name, email address, company, and in some instances your emergency contact. When registering for any event, we may also require you to provide billing information (such as billing name and address and credit card number). Adaptive Insights uses your data for event planning and management, including registration, billing, and other event attendee contact information, or to contact you further about relevant products and services. Any data you provide about emergency contacts or dietary preferences will only be used for health and safety purposes.

Data that we collect automatically

When you visit our Sites and use our Services, we may automatically collect certain data from your device. In some countries, including countries in the European Economic Area (EEA), this data may be considered personal data under applicable data protection laws.

Specifically, the data we collect automatically may include data such as your Internet protocol (IP) address, Internet service provider (ISP), referring/exit pages, files viewed on our Sites (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, device type, browser type, broad geographic location, clickstream data, and other technical data. We may also collect data about how your device has interacted with our Sites and Services, including the pages accessed and the links clicked.

Collecting this data enables Adaptive Insights to better understand the visitors who come to our Sites and the users of our Services, where they come from, and what content on our Sites and our Services are of interest to them. We use this data to analyze trends in the aggregate, to administer the Sites and Services, and to improve the quality and relevance of our Sites and Services to our visitors, customers, and other users. We also use this data to improve, test, and maintain our Services and develop additional products and Services.

Some of this data may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

Data that we obtain from third-party sources

From time to time, we may receive personal data about you from our authorized third-party partners. The types of data we collect from these third parties include name, job title, department, company name, address, phone number, and email address. We use the data to communicate with you about offers from Adaptive Insights. Data we receive from third-party entities is limited to: data for which you’ve given your consent; or data third-party entities are otherwise legally permitted or required to disclose.

In general, we use the personal data we collect from you only for the purposes described in this Privacy Statement or for purposes that we explain to you at the time we collect your personal data.

With whom does Adaptive Insights share my personal information with?

Adaptive Insights will not share personal data about you with other people or non-affiliated companies except to provide the Services you have requested, when we otherwise have your permission, or as described in this Privacy Statement.

Adaptive Insights does not sell personal data that it collects or processes under this Privacy Statement.

We may disclose your personal data to the following categories of recipients:

- To our parent company Workday, affiliates, trusted third-party service providers, vendors, and partners contracted to provide services on behalf of Adaptive Insights. These third-party service providers or vendors may use the data we provide only as instructed by Adaptive Insights.
- Adaptive Insights may offer the following solely or jointly with third-party entities or partners: webinars, events, whitepaper downloads, or other services related to Adaptive Insights offerings or services. We may share your contact information and interests in these offerings or services with these approved third-party entities to communicate with you about Adaptive Insights. When you attend an event (either sponsored by Adaptive Insights or by an Adaptive Insights participating vendor) and have your badge scanned, your data will be shared with Adaptive Insights, as well as with any partner or third-party participating in that event, and potentially with the entity sponsoring your attendance at the event. For example, if your badge is scanned as you

attend a session at an Adaptive Insights-sponsored conference, Adaptive Insights and any co-presenters will have access to that data to understand who was in attendance, and potentially follow up with you about relevant products or services. If you do not want your data shared with Adaptive Insights or partners in this manner, do not have your badge scanned. If your badge is scanned by a partner or a third-party at an event, your data will be governed by that party's Privacy Statement.

- We partner with a third-party ad network to either display advertising on our Sites or to manage our advertising on other websites. Our ad network partner uses cookies and web beacons to collect data about your activities on our Sites and other websites to provide targeted advertising based upon your interests. If you wish to not have this data used for the purpose of serving you targeted ads, you may opt out by [clicking here](#) or if located in the European Economic Area (EEA) [click here](#). Please note that this does not opt you out of being served generic ads.
- To any competent law enforcement body, regulatory body, government agency, court, or other third-party entity that we believe merits disclosure (i) as a matter of applicable law or regulation, (ii) to exercise, establish, or defend our legal rights, or (iii) to protect your vital interests or those of any other person.
- To investigate, prevent, or take action regarding website technical problems, potential security issues, illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Adaptive Insights Terms and Conditions or as otherwise required by law.
- To an actual or potential buyer (and its agents and advisors) in connection with any actual or proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Privacy Statement. In the event of a change in ownership, you will be notified via email and/or in a prominent Statement on our Sites of the change in ownership or uses of your personal data.
- To any other person with your consent to the disclosure.

Mobile applications

When you are using the mobile application for the Adaptive Live event, we may obtain data or access data stored on your device to provide services related to the relevant mobile application. Adaptive Insights uses this data to deliver requested application services, to continue to improve our mobile applications, and to facilitate event participation, such as providing event schedules and the opportunity to connect with event attendees. Adaptive Insights may also collect data from your usage of the Adaptive Live mobile application to improve events and services, communicate with you about the event and relevant products and services, and for security purposes.

Legal basis for processing personal data

Our legal grounds for collecting and using your personal data as described in this Privacy Statement fall into the following four categories:

Consent: In some cases, we ask you for your consent to process your personal data, such as when we need your consent for marketing purposes. You can withdraw your consent at any time, which will not affect the lawfulness of the processing before your consent was withdrawn. If you would like to withdraw your consent, you can do so by emailing privacy@adaptiveinsights.com.

Legitimate Interest: We process certain personal data for the legitimate interests of Adaptive Insights, our parent company Workday, our affiliates, our partners, or customers. These legitimate interests include contacting you to provide support or sending you marketing information (subject to applicable law), detecting, preventing and investigating illegal activities and potential security issues and maintaining and improving the Adaptive Insights Site and mobile applications. We will rely on our legitimate interests for

processing personal data only after balancing our interests and rights against the impact of the processing on individuals.

Performance of a Contract: Sometimes we process personal data to perform our obligations under an agreement with you. For example, we use payment data you provide when you register for an event to process your payment.

Other Legal Bases: In some cases, we may have a legal obligation to process your personal data, such as in response to a court or regulator order. We also may need to process your personal data to protect vital interests, or to exercise, establish, or defend legal claims.

Cookies and similar tracking technology

Adaptive Insights may use cookies, beacons, tags, scripts, log files, and similar tracking technologies (collectively, “Cookies”) to collect data about the pages you view, links you click, and other actions you take when accessing our website, services, emails, or to serve Internet-based advertising. Adaptive Insights or Adaptive Insights Service providers may also use website tracking technologies to observe your activities, interactions, preferences, transactional data, and other computer and connection data (such as IP address) relating to your use of our websites and services. You can configure your browser settings to manage certain tracking technology interaction. For some tracking technologies, you may need to take additional steps to manage their use and removal. Please review your browser privacy settings. For further data about the types of Cookies we use, why, and how you can control Cookies, please see our Adaptive Insights Cookie Statement [here](#).

Access to and updating your information

Registered users can access, update or cancel their account or remove their account data at any time by logging on to the Sites and editing their account data. Alternatively, registered users can email our Customer Support at support@adaptiveinsights.com or postal mail.

How does Adaptive Insights keep my personal data secure?

We use technical and organizational measures to provide the level of security appropriate to the risk of processing your personal data. However, the security of information transmitted through the Internet can never be guaranteed. You are responsible for maintaining the security of your password or other form of authentication involved in accessing password-protected or secured resources. If you have any questions about security on our Sites, you can contact us at security@adaptiveinsights.com.

International data transfers

Personal data collected by Adaptive Insights may be stored and processed in the United States and in any other country where Adaptive Insights or its affiliates, subsidiaries, or third-party service providers maintain facilities. Your personal data may be transferred to, and processed in, countries other than the country in which you are a resident. These countries may have data protection laws that are different from the laws of your country and, in some cases may not provide the same level of protection.

The data we collect from you may be transferred to, and stored at a destination outside of the EEA. It may also be processed by staff operating outside the EEA who work for us or one of our service providers.

However, we have taken appropriate safeguards so that your personal data will remain protected in accordance with this Privacy Statement. These include the EU-US and Swiss-US Privacy Shield, as well as APEC participation.

EU-U.S. and Swiss-U.S. Privacy Shield

Adaptive Insights, a covered entity of Workday, Inc., complies with both the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the EEA, Switzerland, and the United Kingdom to the United States. As a covered entity under Workday's current Privacy Shield certification, Adaptive Insights has also certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Privacy Statement and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield Frameworks, and to view Adaptive Insights's certification under Workday, visit the Privacy Shield [list](#).

Adaptive Insights is responsible for the processing of personal data it receives, under each Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Adaptive Insights complies with the Privacy Shield Principles for all onward transfers of personal data from the EEA, Switzerland or the United Kingdom, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, Adaptive Insights is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Under certain conditions, more fully described on the Privacy Shield [website](#), you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

APEC Participation

The Adaptive Insights Privacy practices described in this Statement, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure the protection of personal data transferred among participating APEC economies. More data about the APEC framework can be found [here](#). The APEC certification does not apply to instances where we process data on behalf of clients for their benefit, such as when we act as a data processor.

Data retention

Adaptive Insights retains personal data we collect from you when we have an ongoing legitimate business need to do so (e.g., to provide you with a Service you have requested for as long as your account remains active, or to comply with applicable legal, tax, or accounting requirements). When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymize it or, if this is not possible (e.g., because your personal data has been stored in backup archives), we will securely store your personal data and isolate it from any further processing until deletion is possible. If you wish to update or delete your testimonial or to request removal of your personal data from our community forum, contact us at privacy@adaptiveinsights.com. In some cases, we may not be able to remove your personal data from our community forum, in which case we will let you know that we are unable to do so and why.

Your rights over your personal data

Depending where you are located, you may have certain legal rights regarding your personal data.

These may include the right to:

- Access your personal data
- Request that your incorrect personal data be updated or deleted
- Request that your personal data be deleted
- Restrict the use of your personal data
- Object to certain uses of your personal data
- Receive a copy of your personal data in an electronic and machine-readable format
- Be exempt from automated decision-making
- Receive the categories of sources from whom Adaptive Insights collected your personal data

Adaptive Insights will not discriminate against you for exercising the above rights.

You, or an authorized and verified individual acting on your behalf, can exercise the applicable rights by contacting us using the contact details at the bottom of this Statement. You also have the right to complain directly to a data protection authority about our collection and use of your personal data.

Marketing Opt-Out

You have the right to opt out of marketing communications Adaptive Insights sends you at any time. You can exercise this right by sending us an email at support@adaptiveinsights.com, or you can unsubscribe by following instructions contained in the email message you received. We reserve the right to send you certain communications relating to related Services, such as service announcements and administrative messages that are considered part of your account membership.

Third-party sites

Adaptive Insights Sites may contain links to other websites. This Privacy Statement only applies to Adaptive Insights Sites, and we are not responsible for the privacy practices or content of other websites. You should check the privacy statements of those sites before providing your personal data to them.

Updates to this Privacy Notice

This Privacy Statement may be amended or revised from time to time at Adaptive Insights discretion. Changes to this Privacy Statement will be posted on the Website and links to the Privacy Statement will indicate that the statement has been changed or updated. If we propose to make any material changes, we will notify you by means of a notice on this page prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact us or our Data Protection Officer at privacy@adaptiveinsights.com or by regular mail addressed to:

Contact details of business/controller

Workday, Inc.
Attn: Privacy
6110 Stoneridge Mall Road
Pleasanton, CA 94568
USA

Contact details of EU subsidiary

Workday Limited
Attn: Privacy
Kings Building, May Lane
Dublin 7
Ireland

Adaptive Insights will respond to your request within a reasonable timeframe or as required by law.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>. If you have an unresolved EEA or Swiss privacy or data use concern that we have not addressed satisfactorily, you have the right to lodge a complaint with the relevant EU data protection authority or the Swiss Federal Data Protection and data Information Commissioner, as applicable.