

## Privacy Policy

At SAP Fieldglass, we are committed to protecting your privacy. Please read the following policy to understand how your personal information will be treated as you make full use of our software and many services. Customers using the SAP Fieldglass application or other specialized applications developed or designed by SAP Fieldglass will be notified of updates to this policy in the release notes to the application. For customers using the SAP Fieldglass extranet or web sites, please check the site for changes from time to time.

**I. Privacy Policy of SAP Fieldglass.** We respect the privacy of our customers and are committed to treating customer information responsibly. Accordingly, we adhere to the following:

- We collect, retain, and use customer information for legitimate business purposes only. We limit the information we collect to that which we believe is appropriate and necessary to manage your needs, provide our services and comply with applicable law.
- We strive to maintain the accuracy of customer information.
- Our employees are responsible for protection of customer information. We have internal policies and programs designed to protect your information. It is the responsibility of each SAP Fieldglass employee to comply with our privacy policies and procedures.
- We provide security safeguards to protect customer information. Multiple security layers, including sensor and host based intrusion detection along with firewalls, protects all customer data. All customer data that is taken off site uses Advanced Encryption Standard (AES).
- We limit the internal and external disclosure of customer information. Other than as set forth herein, SAP Fieldglass does not sell, trade or rent your personal information. To opt to not have your personal information shared as set forth herein, contact us at +(1) 312.763.4800; provided, however that to the extent you are a registered user of the SAP Fieldglass application, your personal information is a requirement and removal of your personal information will result in termination of your user account (i.e., termination of your ability to use the SAP Fieldglass application). We may share with our partners' and customers' non-personal, aggregate statistical information regarding you, your customers, your suppliers, sales, traffic patterns and site usage, but we do not share personally identifiable information with any entity that is not covered by this policy.

**II. The Information We Collect.** We rely on many sources of information to help us understand and meet your needs. On occasion, we enter into agreements with other vendors to provide services in support of the SAP Fieldglass services; currently, SAP Fieldglass utilizes another organization for help desk support services for the SAP Fieldglass application. We carefully stipulate under these agreements

that these vendors may view personal information about you, and that they must protect this information and may not use it for any other purpose other than in connection with our agreement and otherwise in accordance with your instructions and this privacy policy.

We may collect personal information about you including:

- Information about your transactions with us, our affiliates or nonaffiliated third party users of the SAP Fieldglass application;
- Information we receive about you from applications and other forms, which we have collected by your using products or services obtained from us, one of our affiliates or nonaffiliated third party users of the SAP Fieldglass application;
- Information about you as required or permitted by law;
- Your name and other contact details when you call us by phone, write to us or contact us using our website or establish a user account for the SAP Fieldglass application;
- Information about you when you apply for a job or contract with us (for example, your name and contact details, information about your working history and relevant records checks).
- Information we receive from our customers and other third party users of our application. For example, we collect information relating to individuals' job applications from the entities who use the SAP Fieldglass application (for example, companies and their consulting and recruitment agencies). The SAP Fieldglass application is used by companies to manage their workforces. Companies may ask that their agencies also use the application so that these entities can exchange information relating to job candidates between one another. SAP Fieldglass collects this personal information by virtue of hosting the application. The information SAP Fieldglass collects may include sensitive information, such as personal data your employer has deemed relevant for employment-related or record keeping purposes, where you provide that information to us or to the entities that use the SAP Fieldglass application.
- Information about you if you are an individual who is, or who is employed by, one of our suppliers, contractors, related companies, agents and customers. For example, SAP Fieldglass may collect the personal information of the employees or contractors of the entities who use its application.

**III. Why Do We Collect Information?** SAP Fieldglass collects the personal information it needs to provide services and information to its customers, for its business operations and to comply with the law. Depending on the circumstances, SAP Fieldglass may also use personal information about you to:

- Accurately identify you;

- Protect and administer your records and accounts;
- Help us notify you of product enhancements and changes to products;
- Save you time when you apply for additional products and services;
- Comply with certain laws and regulations;
- Collect information about the usage of our services;
- Respond to your requests for information about our services;
- Assist us in our decision on whether or not to make you an offer of employment or engage you under a contract.

If you choose not to provide certain personal information to us, we may not be able to provide you with the services or information you require.

**IV. How Do We Collect Your Information?** SAP Fieldglass collects information related to you in several ways:

- Some personal information is gathered when you register. The more information you volunteer (and the more accurate it is), the better we are able to customize your experience.
- In addition to the above, we may also ask you for personal information at other times, including (but not limited to) when you enroll in a program offered by one of our partners, when you alter your request for services (i.e., increase your annual spend) and when you report a problem with our software or one of our services. If you contact SAP Fieldglass we may keep a record of that correspondence. SAP Fieldglass may also occasionally ask you to complete surveys that we use for research purposes.
- As noted above, we may also collect your information from third party users of the SAP Fieldglass application. For example, we collect information relating to individuals' job applications from entities that use the SAP Fieldglass application.

**V. How is the Collected Information Used?**

- We may monitor usage to help us develop upgrades to the software and develop the design and layout of the website.
- We may also use the information we collect to occasionally notify you about important functionality changes and special offers we think you'll find valuable.

- SAP Fieldglass collects, stores and uses information from the users of its application (meaning the computer software programs), and the hosted environment (meaning a hardware/software system combination under the control of SAP Fieldglass on which the Product, or any portion thereof, is run). Aggregated versions of this information (information that does not personally identify you) may be used in many ways. For example, we may combine information about your usage patterns, with similar information obtained from other users to help enhance the application or hosted environment and our services. Additionally, SAP Fieldglass may keep track of this information and the information that you provide to us for our internal review, business development, research, press inquiries or aggregate statistical analysis, customization, demographic patterns, and historical trends. Aggregate information may occasionally be shared with our business partners and customers, and this information does not include any personally identifiable information about you or allow anyone to identify you individually. As SAP Fieldglass adopts additional technology we may also gather information through other means.

**VI. Disclosing Personal Information.** For the purposes described in this policy, we may disclose personal information:

- to any of our related companies;
- to our suppliers, contractors and service providers, professional advisers, dealers and agents;
- to government agencies or individuals appointed by a government responsible for the investigation and resolution of disputes or complaints concerning use of our services;
- to anyone to whom our assets or business (or any part of it) is transferred or offered to be transferred;
- where you have otherwise consented; or
- as otherwise required or authorized by law.

We may disclose personal information to recipients outside of the United States, the United Kingdom and Australia. Such recipients are likely to be located in the jurisdictions in which we have corporate offices – for example, our main headquarters are located in the United States, with related companies located in the United Kingdom and Australia. We take reasonable steps to ensure the persons and organizations to whom we disclose personal information are bound to protect the privacy of that personal information in accordance with applicable law.

**VII. Information Security.** We restrict access to personal information about you to those who need to have that information to provide products or services to you. If we use other companies to provide products or services to you, we require that they keep the information we share with them safe and secure. We have physical, logical and procedural safeguards in place that comply with legal requirements to store and secure information about you from unauthorized access, alteration and

destruction. We remind you, however, that the internet is not a secure environment and although all care is taken, we cannot guarantee the security of information that you provide via the SAP Fieldglass application.

**VIII. Cookies and IP Address Tracking.** The SAP Fieldglass website may use cookies for site administration purposes. If for any reason you wish not to take advantage of cookies, you may have your browser not accept them, although this may disable or render unusable some of the features of the SAP Fieldglass application.

SAP Fieldglass' website may also detect and use your IP address or domain name for internal traffic monitoring and capacity purposes or to otherwise administer the application. No personal information is obtained; rather the patterns of usage of visitors to the website may be tracked for the purposes of providing improved service and content based on aggregate or statistical review of user site traffic patterns.

The SAP Fieldglass application may contain links to other websites. SAP Fieldglass is not responsible for the privacy practices or the content of such other websites. The privacy policies applicable to such other websites may differ substantially from this privacy policy so we advise you to read them before using those websites. SAP Fieldglass will not be liable for any use of those websites.

**IX. Consent.** By using the SAP Fieldglass application, you consent to the collection, use and disclosure of this information, including any sensitive information, by SAP Fieldglass. If we decide to change our privacy policy, we will post those changes in this document so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. SAP Fieldglass reserves the right, at any time, to modify, alter or update these policies. This policy is effective as of June 26, 2002 and may be modified from time to time. In the event you have any inquiries regarding these privacy matters, please contact us at +(1) 312.763.4800.

SAP Fieldglass is a participant in the Safe Harbor programs developed by the U.S. Department of Commerce with the European Union and with the Federal Data Protection and Information Commission of Switzerland. SAP Fieldglass has certified that we adhere to the Safe Harbor Privacy Principles with regard to our use of certain personal data. For more information about Safe Harbor and to view our certification, visit the U.S. Department of Commerce's Safe Harbor Web site.

<http://www.export.gov/safeharbor>.

Fieldglass is aware of the decision of the European Court of Justice involving the "Safe Harbor" framework and has taken the necessary steps to remain in compliance with its obligations under applicable data privacy laws and regulations. Despite changes in applicable law, Fieldglass is committed to maintaining robust data privacy and data security controls in order to protect each individual's right to privacy, including working with Customers to address country-specific regulations and continuing to uphold the privacy principles required for self-certification under Safe Harbor. If you have any specific questions or concerns, please feel free to reach out directly to [fieldglasscompliance@sap.com](mailto:fieldglasscompliance@sap.com).

## X. Additional Provisions.

**Access, Correction and Complaints Handling.** Any issues, questions, complaints that you have regarding the access, correction and/or handling of your information must be addressed with your employer's administrator of the SAP Fieldglass application.

**Destruction of Personal Data.** SAP Fieldglass retains personal information for only as long as necessary to fulfil the stated purposes or as required by law or regulation. Thereafter, except in the event of a governmental audit, investigation, or pending litigation, records containing personal data are destroyed by either deleting them from electronic files (including back-up and archived files) or properly disposing (such as in a shredder or document destruction repository) hard copies and electronic media such as disks or backup tapes.

**Further Information.** If you would like further information about our privacy policies or practices please contact our Privacy Officer:

### SAP Fieldglass

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