



Privacy Policy

Version 3.5: effective as of 1 September 2025

GRAPHISOFT/3DCADCO GENERAL PRIVACY POLICY AND INFORMATION FOR DATA SUBJECTS

INTRODUCTION

This Privacy Policy is designated to generally describe how personal data is collected, used, processed and protected in connection with the business operations of Graphisoft SE (registered address: 1031 Budapest (Graphisoft Park), Záhony u. 7., Hungary; hereinafter: **Graphisoft or Data controller**) acting as Data controller and in certain cases as Data processor while complying with the applicable legal regulations.

This Privacy Policy also gives thorough information for the data subjects on their rights pertaining to the processing of their personal data.

This Privacy Policy applies to the processing of the personal data of our Website Users, Customers, Users of Our Products and Services, guests and the personal data of people, who aim to engage in a contractual relationship and those who were in a contractual relationship earlier; and any other person whom we may contact while operating our business. This Privacy Policy does not apply to any employment related data processing.

Please be advised that **Graphisoft** may unilaterally amend this Privacy Policy from time to time. Please visit <https://graphisoft.com/legal/privacy-policy> regularly if you want to keep up to date.

DEFINITIONS

What constitutes as “personal data”?

“Personal data” means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

What is data processing?

“Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Who is the data controller?

“Controller” means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and

means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Who is the data processor?

“Processor” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Who is a third party?

“Third party” means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

Who is a recipient?

“Recipient” means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

What is a consent?

“Consent” of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

What is a data breach?

“Personal data breach” means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

1. BASIC INFORMATION ABOUT THE DATA CONTROLLER

1.1. Data controller/processor

This Privacy Policy regulates the data processing by Graphisoft, and it is therefore Graphisoft who generally qualifies as data controller in respect of your personal data. There are however certain cases where Graphisoft does not act as a data controller but instead acts as a subordinate of another data controller, which case Graphisoft is understood to be a data processor (acting on behalf of another controller while processing the personal data – in such case Graphisoft proceeds in accordance and based on the instructions of the data controller and processes data only to the extent as prescribed by the data controller). Please note that this is especially relevant in the case of the joint CRM system, in which Graphisoft’s Partner may record customer data (name, email address, company, phone number). During these data processes Graphisoft acts as data processor.

Please also note that Graphisoft operates and provides its services with close cooperation with its subsidiaries, distributors and resellers (hereinafter collectively referred to as the “Graphisoft Partners”), therefore the electronic systems of Graphisoft (where most of our products are marketed and are available) are designed to share the relevant information with Graphisoft Partners. Based on this system structure it may occur that the data processed by Graphisoft Partners are shared with Graphisoft Partners or Graphisoft Partners share

personal information with Graphisoft. Additionally as Graphisoft is part of the Nemetschek Group that includes multiple sister brands, due to common product development and process streamlining initiatives, personal data might get exchanged within the Nemetschek Group (e.g. through common IT platforms, AI Assistant); such cases are mentioned within the relevant data processing activity.

In all cases internal policies and procedures (furthermore agreements) regulate the access to the databases to ensure that while we aim to provide the best service possible all data processing are in compliance with the legal regulations.

List of Graphisoft Partners and their contact details are available here: [Graphisoft Partners](#).

1.2. Contact details

Graphisoft's contact details for data protection and privacy related matters are as follows:

Name: Graphisoft SE

Email address: gdpr@privacy.graphisoft.com

Postal address: 1031 Budapest (Graphisoft Park), Záhony u. 7., Hungary

Phone number: 0036 1 437 3000

1.3. Designation of data protection officer

Please note that Graphisoft examined the need to appoint a data protection officer according to Article 37 of the GDPR (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, **GDPR**) and drew the conclusion that Graphisoft is not required to do so in light of the mandatory appointment criteria, in particular, Graphisoft's core activities do not include processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale. However, since Graphisoft has always added considerable weight to the privacy of personal data, Graphisoft appoints a data protection officer and dedicated sufficient staff, resources to ensure that it is able to discharge its obligations under the GDPR.

Availabilities of the data protection officer:

- Position: Data Protection Officer
- E-mail: gdpr@privacy.graphisoft.com
- Telephone number: 0036 1 437 3000

1.4. Websites and services using this privacy policy

This Privacy Policy applies to the privacy practices of Graphisoft's websites as well concerning all websites operated by Graphisoft ("**Websites**"), which include, without limitation, the following:

1. <https://www.graphisoft.com>,
2. <http://archicad-talk.graphisoft.com>,
3. <http://www.implementbim.com>,
4. <https://www.myarchicad.com>,
5. <https://www.bimcomponents.com>,
6. <https://bimx.graphisoft.com>,
7. <http://archicad.com>,
8. <https://graphisoftid.graphisoft.com>,
9. <https://accounts.graphisoft.com/>,
10. <https://learn.graphisoft.com>,

11. <https://workfromhome.graphisoft.com>,
12. <https://community.graphisoft.com>
13. <https://helpcenter.graphisoft.com/>
14. <https://help.graphisoft.com/>
15. <https://shop.graphisoft.com>
16. <https://store.graphisoft.com>
17. <https://3dcadco.com>

as well as our products, online services and applications that include a link to this Privacy Policy and as such, sets out the basis on which any personal information we collect from you, or that you provide to us whether on the above websites, or otherwise (for example: in connection with the purchase of a product or service from us, or when we purchase service from you), will be processed by us. Importantly, this Privacy Policy also applies to Graphisoft's marketing and advertising practices, as described below. Please be advised that details of each individual data processing include at least the following information:

- identification and contact details of data controller if any; identification and contact details of data processor(s);
- the purpose of processing;
- the legal basis for the processing;
- where the processing is based on the legitimate interests pursued by Graphisoft or by a third party then detailed description of this legitimate interest;
- the recipients or categories of recipients of the personal data, if any;
- where applicable, the fact that the data is being transferred to a third country (including if access is being granted to another controller/processor from a third country) and how suitable safeguards are provided.

The above facts may also be detailed in the product specific End User License Agreements or other documents that may apply to the website or application you are using.

2. GENERAL RULES

2.1. GENERAL PRINCIPLES

Personal data shall be:

1. processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with GDPR, not be considered to be incompatible with the initial purposes ('purpose limitation');
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
5. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');
6. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

The data controller shall be responsible for, and be able to demonstrate compliance with the above principles ('accountability').

2.2. LEGAL BASIS OF THE DATA PROCESSING – LAWFULNESS

Processing shall only be lawful if at least one of the following applies:

1. the data subject has given consent to the processing of his or her personal data for one or more specific purposes – i.e. if you signed a consent form or given your consent via electronic means (pressing consent button or link, or giving consent over recorded telephone etc.).
2. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract – i.e. in case you are or want to be in a contractual relationship with Graphisoft and the processing of your data is necessary for the performance of the contract. Please note that in such case your separate consent is not required, and your data is processed as long and to the extent as required for the performance of the contract.
3. processing is necessary for compliance with a legal obligation to which the controller is subject – i.e. in case a EU or national piece of legislation prescribes for Graphisoft to process your data (data of invoices, data of customer complaints etc.). Please note that in such case also your separate consent is not required, and your data is processed as long and to the extent as required and prescribed by law.
4. processing is necessary in order to protect the vital interests of the data subject or of another natural person;
5. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
6. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

IN ORDER TO MEET THE ABOVE REQUIREMENTS AND TO GIVE YOU PROPER INFORMATION ON THE PROCESSING OF YOUR PERSONAL DATA AND YOUR RIGHTS AND OBLIGATIONS, WE COLLECTED THE MOST FREQUENT CASES WHEN WE PROCESS PERSONAL DATA. PLEASE NOTE THAT THE LIST OF DATA PROCESSING IN THIS PRIVACY POLICY IS NOT EXHAUSTIVE; BESIDES WHAT IS DETAILED HEREIN THERE COULD BE OTHER SPECIFIC CASES WHEN WE NEED TO PROCESS YOUR PERSONAL DATA. IN ALL CASES YOU WILL BE ADVISED DULY BEFORE YOUR PERSONAL DATA IS COLLECTED FOR OTHER PURPOSES THAN DESCRIBED IN THIS PRIVACY POLICY. PLEASE BE INFORMED THAT IN CASE YOU ARE USING OUR SERVICES VIA OUR WEBSITES THEN THE DETAILS OF THE DATA PROCESSING ARE DESCRIBED ALSO AT THE GIVEN GRAPHISOFT WEBSITE.

3. DATA PROCESSING ACTIVITIES

Please note that the below description is a general guideline and advisory and specifics of each data process are detailed on the relevant Website.

3.1. WHAT INFORMATION DOES GRAPHISOFT COLLECT ABOUT YOU?

In case you are using our Websites, Products or Services, Graphisoft collects several types of personal, aggregated, pseudonymous and anonymous data about you, which may include the following:

Aggregated Data including statistical, demographical or other data which is related to you, but may not be used to directly or indirectly identify you, and which therefore does not fall as personal data.

Contact Data includes postal address (city, ZIP code, state and region), billing address, delivery address, location, company name, e-mail address, phone number, contact preferences.

Eligibility Data includes information about your location, company name, user status, Graphisoft partner data, title, purchase timeframe, purpose, used CAD software and company size data, school data, school website.

Financial Data includes credit card and bank account information, details about your payments and payment defaults, VAT/TAX ID number.

Identity Data includes your full name, position, company name, user status.

Marketing and Communications Data includes your preferences in receiving marketing from Graphisoft and its affiliates and also upon your consent from third parties, and your communication preferences.

Profile Data includes your username, password, Graphisoft ID (you must create it when purchasing/obtaining and using a license, registering to use a Graphisoft website and application), Company Graphisoft ID, purchases or orders made by you, your interests, preferences, feedback and survey responses and other similar interactions, data collected from and via e-mails and phone calls and other communications, and other personal data derived from such data and decisions made on the basis of Profile Data.

Technical Data includes referral URL, internet protocol (IP) address, connection IP address, WIFI network (SSID), your login data, browser type and version, time zone setting and location, operating system and platform and other technology on the devices you use to access our websites indicated above and when you use our products and services

Transaction Data includes details about payments made by you and other details of products and services you have purchased from Graphisoft such as the date of acceptance of the product/service specific terms and conditions.

Usage Data includes information about how you use our or our partners' websites, products and services (including data generated during user interactions on Graphisoft and third party websites, such as registrations, likes and comments, and also data collected automatically via normal IT environment operations (such as crash reports etc.).

Graphisoft always indicates whether the provision of a certain data is mandatory or optional. Where the provision of a data is mandatory and you fail to provide it, Graphisoft may not be able to provide the requested service or product, in which case you will be informed accordingly.

3.2. HOW AND WHERE DOES GRAPHISOFT COLLECTS THIS INFORMATION?

3.2.1. Registration on Graphisoft websites and Customer Support – Graphisoft ID

In order to be able to use our Products and Services You must sign up and have a valid Graphisoft ID ('GSID'). When you register to use a Graphisoft Website or application, provide your Graphisoft ID, or contact us for support or other offerings or submit a claim, Graphisoft collects Identity Data about you to verify your eligibility. For the verification process Graphisoft uses its identity management service provider. For obtaining certain special (for example student and teacher) licenses of our applications, further Eligibility Data is required. When you contact us for support, we may request from you to provide us with copies of your files, photos, documents or other data (although that might not constitute as personal data). Please note that we use your Graphisoft ID for statistical purposes identifying the number of actual users logged in at the same time.

If You are a user of Graphisoft product or service, we combine the Identity Data and Eligibility Data You provide us when registering to the Graphisoft ID with the Technical and Usage Data we collect during Your use of our products and services for the purposes of

1. *providing You statistical data on your usage*

2. *offering You tailored additional products and services via our marketing communications (if consent is given)*
3. *collecting feedbacks about our products and services for product development (if consent is given).*
4. *customer success management: analyse customer interactions and measure success at each stage of the customer lifecycle*

3.2.2. Graphisoft support lines

Being subject to individual agreement you may contact us for support in technical issues and other service questions by a designated telephone line or e-mail address. When you call this support line Graphisoft collects Identity Data about you. Based on the type of your request additional information might be required to provide the best solution. In order to further improve Graphisoft service, we would like to measure your satisfaction and the performance of the service via a satisfaction survey. Your feedback is processed and retained based on your consent till withdrawal. Please note that in most cases such support lines are operated by our third-party vendors as data processors.

3.2.3. Graphisoft Websites and Applications

We collect Technical and Usage Data, including information about how you use our websites and applications with or without registration or log-in. We collect information that your browser or device typically sends to our servers whenever you use (e.g. input text) on or visit a Graphisoft website, or when a Graphisoft desktop product or application feature takes you online (as when you visit Online help). For example, your browser or device may tell us your IP address (which may also tell us your location) and the type of browser and device you used. When you visit a Graphisoft Website, your browser may also tell us information such as the page that led you to our website (referral URL) and the websites you generally visit. To collect this information, Graphisoft may use cookies (please see our cookie information notice below) and similar technologies, and our servers may collect similar information when you are logged in to the website or application. As mentioned below, you may always refuse or opt out of the use of cookies or similar technologies. If you identified yourself or registered at a Website or application, this information may be associated with you or if you have not identified yourself or registered at a Website or application it will be anonymous.

3.2.4. Development consultations

Consultants participate in the Graphisoft Development Consultation Program (“GDC Program”) organized by Graphisoft to elaborate and discuss specific development themes in connection with planning a product. When you participate in the GDC Program we collect your Identity data, Contact data, also certain Technical and Usage data.

3.2.5. Graphisoft Forums

For certain products and developments Graphisoft operates platforms for users/consultants to share their ideas, thoughts, questions and for other community activities. The platform is provided by Khoros LLC.

In order to participate in the Community Platform, you need to log in with your Graphisoft ID and provide a username; without Graphisoft ID You are not allowed to post. Any post You make on the platform, your username (and any other personal data you voluntary provide) will be publicly displayed and visible for users and non-users, though you can make your post anonym if you provide un-personal user name.

When registering and using the Community Platform, Graphisoft is processing your Profile Data (including GSID), Identity Data, IP address and Contact Data for verifying your eligibility and provisioning Graphisoft services, and any other data you voluntary provide (e.g. photo of you, self-description, position). For the verification process

Graphisoft uses its identity management service provider. Graphisoft shares your Graphisoft ID, name, IP address and username with Graphisoft Partners, site moderators and site administrators to ensure compliance with the Community Platform's Terms of Use and Community Guideline. Others (and the public) can see only your username (and photo if You provided). Any personal data provided on the platform will be accessible by Khoros LLC being the provider of the platform who acts as a data processor of Graphisoft.

Graphisoft processes your personal data based on your consent (GDPR point a) Article 6(1)) which can be revoked any time by deleting your community account by yourself or asking Graphisoft's support; this will also anonymize your posts (removes your username) but keeps the content untouched.

3.2.6. Graphisoft Emails

Emails we send you, on the basis of your prior written (including electronic means) consent if you are an individual, usually include technologies that tell Graphisoft whether you have received or opened the email, or clicked a link within the email. If you do not want us to collect this information from Graphisoft marketing emails, you may withdraw your consent at any time and can either opt out of receiving Graphisoft marketing emails either on the "my_profile", or a similar feature of the website or application you are using, or by clicking "unsubscribe" at the end of the message or just simply writing an email to the email addresses highlighted at point 9.8. Also for more detailed description of your rights, please also refer to clause 9.

3.2.7. Graphisoft Online Advertising

Graphisoft advertises online in a variety of ways, including displaying Graphisoft ads on websites and in apps. We collect your Technical and Usage Data on our websites, including information about which ads are displayed, which ads are clicked on, and on which web page the ad was displayed, and which campaign has generated certain user actions – such as web page views and web page interactions, mobile app interactions, mobile app purchases, file downloads, contact form submissions or registration to Graphisoft's online services.

3.2.8. Buttons, Tools, and Content from Other Companies

Graphisoft websites and applications may include buttons, tools, or content that link to other companies' services (for example, a Facebook "Like" button). Using these features is completely voluntary, should you decide to use them then please note that we collect information about your use of these features. In addition, please note that when you see or interact with these buttons, tools, or content, or view a Graphisoft Website containing them, some information from your browser may automatically be sent to the other company (usually at least a JavaScript code snippet is downloaded from the web server of the other company, which action –being a standard web request– sends most of the details listed under the Technical Data). Please read that company's privacy policy for more information.

3.2.9. Third-Party Sites and Services

Graphisoft websites, products, online services, and applications may contain links to third-party websites, products, and services. Our products and services may also use or offer products or services from third parties – for example, a third-party ARCHICAD add-on. Graphisoft will not transfer any of your data while you are using these links or navigate to third-party website, in such case it will be these third parties who will advise you on their data processing and collect information from you, which may include such things as Contact Data, these data processing are governed by the privacy practices of these third parties. We encourage you to learn about the privacy practices of those third parties.

We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, such as Google, Facebook, Linked In, Hotjar, 10Duke, Salesforce, ChurnZero and Sajari Pty Ltd based inside or outside the EU) and may receive Technical Data or information about you from them that we usually combine with other information we have about you.

3.2.10. Public sources

To help keep our databases current and to provide you the most relevant content and experience, we may combine information from you with information from public sources and our trusted partners, in accordance with applicable law.

3.2.11. Events

To update you about our products and services, industry relevant news, we either organize, sponsor or participate in certain events. To build up and improve business relation with you, we may collect your contact information verbally or via business cards on various Events either held by us or others. Also, when we sponsor industry specific events, we can gather your registration information from the organizers in compliance with the applicable regulations.

3.2.12. Social Media

We use different social media platforms to interact with you, answer and support your queries and questions. We might collect and use your personal data for such interactions with you. We use the general social media platforms (like Facebook, LinkedIn and WhatsApp) and also some local ones depending on which one is available in your region.

We also operate BlogPost, to publish relevant and actual information with respect to Graphisoft's products and services, events and industry specific news, where you have the option to comment on them. Commenting on our blogs does not require any registration, it can be anonym unless you wish to disclose your identity.

3.2.13. Graphisoft classroom or online trainings, seminars

Graphisoft offers different services:

1. train the trainer trainings aimed at Graphisoft Partners; and
2. trainings to Building Information Modeling managers and end users using Graphisoft Products.
3. professional seminars available for the public (after registration)

These training services may be offered free of charge or in consideration of certain reimbursement as specified in the relevant terms and conditions.

Graphisoft collects and uses the following personal data:

1. first name;
2. last name;
3. full mail address;
4. phone number;
5. company name;
6. position;
7. region and
8. face and voice of online training participants (if participant approves such functions by enabling their operation) during the training and storing the recording of face and voice after the training for a limited

period of time.

Purpose of data processing:

1. registering to participation;
2. invoicing;
3. issuing / re-issuing certificate / confirming that certificate has been issued;
4. issuing targeted newsletters about new trainings (if consent has been given);
5. issuing targeted emails for training feedback and follow up;
6. statistical purposes; and
7. online trainings might get recorded for the purpose of supporting the participants in their learning and enabling to re-watch the training
8. customer success management: analyse customer interactions and measure success at each stage of the customer lifecycle
9. roadmap to success: assess the use of the product by the users and provide feedback

Legal base of the data processing:

1. if you as natural person enter into the agreement with Graphisoft then performance of contract (GDPR point b) Article 6(1)) and if your company enters into the contract then the legitimate interest of Graphisoft (GDPR point f) Article 6(1)).
2. consent in case of marketing inquiries (GDPR point a) Article 6(1)).
3. for the purposes of customer success management and roadmap to success: the legitimate interest of Graphisoft (GDPR point f) Article 6(1)).

Data retention periods:

Save for the data relating to certificates issued for Graphisoft classroom trainings (either online or classroom), the data retention period is 3 years after the last training participation.

The data retention period for data relating to certificates is 10 years after issuance of the certificate. This time period is needed to ensure that Graphisoft can re-issue certificates if someone lost it or to verify the training certifications on request.

Training recordings and course materials are available for the attendees on the webpage for another 12 weeks after the end of the course, which becomes inaccessible after that. From Graphisoft side the recordings are either deleted or anonymized (meaning that face & voice of participants and other potential personal data in it are removed).

Data transfers:

Personal data of training participants are shared with Graphisoft Partner(s) as well as with certified external trainers acting according to Graphisoft's instructions as Graphisoft's data processors if the participant is registered for local trainings. The purpose of the data transfer is to provide the training to the participant and follow-up on the course and other trainings.

The training recordings are shared with the participants of the same training course for a limited time period not longer than 12 weeks after the end of the course. The purpose of the data transfer is providing the training to the participant by also enabling the participant to review the course during a limited period of time.

Data transfer activities between Graphisoft, and Graphisoft Partners are contractually agreed.

The collected personal data is shared with the relevant Graphisoft Partner(s) for the purposes of verifying the training certifications on request.

For managing the registrations from technical point of view, Graphisoft might use certain external service platforms (e.g. Eventbrite).

3.2.14. Children's data

Graphisoft does not offer any of its products or services to children under the age of 16 and does not allow children under the age of 16 to register on the Websites.

3.2.15. Graphisoft webshop

Graphisoft's products and services can also be purchased through webshops which are operated by Graphisoft or Graphisoft's subsidiaries (Graphisoft Asia Ltd (Admiralty Centre, Tower 2/ Level 11,18 Harcourt Road, Admiralty Hong Kong); Graphisoft Italia s.r.l. (Via Rossignago, 2/a Spinea, (VE) Italy, 30038); Graphisoft UK Limited (Harman House, 1 George Street, Uxbridge, UB8 1QQ, United Kingdom) and Graphisoft North America Inc. (60 Hickory Drive, 1st Floor, Waltham, Massachusetts 02451, USA).

The below description covers the webshops operated by Graphisoft SE and Graphisoft Asia Ltd (store.graphisoft.com) and the one operated only by Graphisoft SE (shop.graphisoft.com), hereinafter the 'Webshop operators'. Data processing activities of the other webshops are not covered by this policy.

The Webshop operators collect and process the following personal data of data subjects purchasing Graphisoft products and services:

1. Identity Data
2. Contact Data
3. Financial Data
4. Transaction Data
5. IP address
6. Graphisoft ID

for the purpose of identifying the customer and processing and delivering the orders, contacting the customer in relation to the purchase(s) and follow-ups. For the purpose of invoicing, compliance activities and for managing the payments, Webshop operators use external technical reseller (FastSpring) and payment processor (Stripe Inc, PayPal) processing data subjects' personal data mentioned at this point from a) to f). The Webshop operators do not process and store any Financial data of the Customer (e.g. bank card information).

Legal base of the data processing:

1. if data subject as natural person enter into the agreement with the Webshop operator then performance of contract (GDPR point b) Article 6(1)) and if the data subject's company enters into the contract then the legitimate interest of the Webshop operator (GDPR point f) Article 6(1)).
2. consent in case of marketing inquiries (GDPR point a) Article 6(1))
3. legitimate interest in case of 'onboarding' emails relating to the use of products purchased and exit surveys relating to product cancellations (GDPR point f) Article 6(1)).

For the purposes of providing products and services purchased, the Webshop operators work together with Graphisoft Partners – based in the region of establishment of data subject to whom the Identity Data, Contact Data, Transactional Data and Graphisoft ID are transferred. The data transfer between the Webshop operators

and the relevant Graphisoft Partner(s) are also required for financial settlement purposes between these entities.

If consent has been given, then either Graphisoft, the Webshop operators or Graphisoft Partners – operating in the same region as data subject is located – can approach the data subjects for electronic direct marketing purposes.

To help you use the features of the products you have purchased properly, Graphisoft will send you emails after your purchase to share useful information and training recommendations (called ‘onboarding emails’). When you cancel your trial or subscription, to understand the reason of your cancellation and to collect ideas how to improve your experience, Graphisoft will ask you to fill out a short ‘exit survey’.

Data processing activities between Graphisoft, the Webshop operators Graphisoft Partners and 3rd parties are contractually agreed.

Data retention period is in accordance with accounting and taxation rules if the legal base of the data processing is the performance of contract, while if the personal data is processed based on consent until express withdrawal of such consent.

In addition to the above, the following applies when subscription is purchased in Graphisoft webshop:

For subscriptions, Graphisoft uses its identity management and license management service provider for cloud license management and user authentication. For the cloud license management, Graphisoft’s service provider processes your data provided during the GSID registration and your license data to verify the eligibility for the use of Graphisoft products.

Depending on whether you sign up for the free trial period or purchase the paid version of the Graphisoft product via the webshop, the information you need to provide may differ.

If you decide to use a Graphisoft Partner’s support in purchasing in the Webshop, you need to provide your personal data (identity and contact data) to the Graphisoft Partner who acts as a data processor. In such case the legal base for data processing is your consent (GDPR point a) Article 6(1) that you can withdraw until you purchase the product; after that legal base for processing your personal data is the performance of the contract (GDPR point b) Article 6(1).

3.2.16. Recruitment

Your personal data will be processed for the purposes of managing our recruitment related activities, which include setting up and conducting interviews and tests for applicants, evaluating and assessing the results thereto, and as is otherwise needed in the recruitment and hiring processes. Such data processing is based on the provisions of Art. 6(1)(f) of Regulation (EU) 2016/679 (General Data Protection Regulation – “GDPR”) as it is necessary for the purposes of the data controller’s (Graphisoft SE) legitimate interests, which are the solicitation, evaluation, and selection of applicants for employment.

Your personal data will be shared with SuccessFactors engaged by Graphisoft as data processor under Article 28 GDPR, a cloud services provider located in the St. Leon-Rot, Germany. Please be informed that you may request information on the data processed from the data controller (Graphisoft SE, please submit your query via the following webform: [FORM](#)). If you consider our data processing being unlawful, then you are entitled to object the data processing and to obtain restriction of processing and to request the erasure of the data. If you consider that your rights have been infringed as a result of processing your personal data by the Graphisoft SE,

then you have the right to lodge a complaint with Hungarian National Authority for Data Protection and Freedom of Information (NAIH, 1055 Budapest, Falk M. u. 9-11.) or may request remedy from court. Before doing so, it is recommended that you first try to obtain remedy by contacting Graphisoft SE (via the following webform: [FORM](#)).

3.2.17. Graphisoft Forward

For purchasing Graphisoft FORWARD product and service, your identity and contact data are provided to Graphisoft by either a Graphisoft Partner or your colleague at your company (purchasing Graphisoft Forward). Graphisoft made the necessary measures to provide you preliminary information about data processing - required by law – and you acknowledged that your data shall be processed by Graphisoft as data controller. If you have not provided your personal data for the below mentioned purposes, contact us at the following webform: [FORM](#) Graphisoft processes your Identity, Contact Data, IP address and Graphisoft ID for the purpose of

1. entering and maintaining contractual relationship with you (including the entity you represent),
2. keeping business relationship with you concerning the Graphisoft Forward Agreement where you have been identified as contact person.
3. providing you Graphisoft Forward services and benefits.

Graphisoft uses the following legal basis for processing your personal data: if you as natural person enter into the agreement with Graphisoft then performance of contract (GDPR point b) Article 6(1)) and if your company enters into the contract then the legitimate interest of Graphisoft (GDPR point f) Article 6(1)).

Data retention period is in accordance with accounting and taxation rules if the legal base of the data processing is the performance of contract.

3.2.18. Educational licenses

Educational license can be requested on www.myarchicad.com website after logging in with Graphisoft ID. According to point 3.2.14 users under the age of 16 are not allowed to use the Graphisoft services and request educational license.

Depends on your preference (student, teacher or school) selected, after login you need to fill out a license registration form where you need to provide certain additional personal data for the following reasons:

1. checking your eligibility: e.g. date of birth, your school name and its address, student ID or other proof of eligibility
2. statistical purposes: e.g. your city, zip code, faculty, program of study. When your data is used for statistical purpose, all your personal identification data are removed from the reports and analysis.
3. to provide you gift (available in certain countries only): home address
4. to comply with local regulations (differ by region): e.g. fiscal code, VAT number
5. marketing purposes if you provided your marketing consent: phone number.

In order to provide you the product and service, including technical support (differ by region) and check your eligibility, your registration details are shared with the relevant Graphisoft Partner (the one located in your county or the one you selected during the registration).

Graphisoft uses the following legal basis for processing your personal data: if you as natural person enter into the agreement with Graphisoft then performance of contract (GDPR point b) Article 6(1)) and if your company enters into the contract then the legitimate interest of Graphisoft (GDPR point f) Article 6(1)).

Data retention period is 3 years after the registration / renewal of registration.

3.3. FOR WHAT PURPOSES AND ON WHAT BASES DOES GRAPHISOFT USE THE INFORMATION IT COLLECTS ABOUT YOU?

3.3.1. In most cases, Graphisoft will use your personal data on the following legal bases:

Consent: when Graphisoft, or Graphisoft Partners send you marketing communications via electronic means, such as e-mail, text messages, personal messages (point a) Article 6(1) GDPR).

Legitimate interest: where processing is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests, and we may verify that a favourable balance of interest test has been carried out (point f) Article 6(1) GDPR).

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you.

Performance of contract: where Graphisoft needs to perform the contract we are about to enter into or have entered into with you as natural person (point b) Article 6(1) GDPR).

Legal obligation: where Graphisoft needs to comply with a legal obligation, such as tax or other regulatory obligations and requirements (point c) Article 6(1) GDPR).

3.3.2. By way of background information, in general, **legitimate interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Please be advised if you need further information on the summary of the balance of interest tests carried out by Graphisoft in relation to the activities set out in the below table, please contact us. Of course, you can always obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

3.3.3. **Performance of contract** means processing your data where it is necessary for the performance of a contract to which you as a natural person are a party or to take steps at your request before entering into such a contract.

3.3.4. **Legal obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

3.3.5. The below table includes a general overview on relevant purposes for which Graphisoft processes your data in the context of various activities, and also the relevant legal basis Graphisoft relies on.

Purpose/Activity	Data type	Legal basis
Verification of eligibility: To check your eligibility for certain Graphisoft products and services	(1) Identity Data (2) Contact Data (3) Eligibility Data (4) Profile Data	Performance of contract (natural persons)/ Legal obligation and Legitimate Interest
Customer registration: To register you as customer	(1) Identity Data (2) Contact Data (3) Profile Data	Performance of contract (natural persons)/ Legal obligation and Legitimate Interest
Provision of products and services: To provide you with the Graphisoft websites and applications for which you have registered, as well as any services, products, support, or information you have requested	(1) Identity Data (2) Contact Data (3) Financial Data (4) Transaction Data (5) Marketing and Communications Data (6) Profile Data (7) Usage Data (8) Technical Data	Performance of contract (natural persons)/ Legal obligation and Legitimate Interest
Processing orders and managing payments: To process and deliver your orders including: (1) Manage payments, fees and charges (2) Manage subscriptions, including informing you about the expiration of your subscription (3) Collect and recover money owed to us	(1) Identity Data (2) Contact Data (3) Financial Data (4) Transaction Data (5) Graphisoft ID	(1) Performance of contract (natural persons)/ Legal obligation and Legitimate Interest (2) Legitimate interest to recover debt and outstanding fees
Regular (not marketing related) notifications: To manage our relationship with you which will include notifying you about changes to our terms or Privacy Policy To keep our records updated and to monitor how customers use our products/services	(1) Identity Data (2) Contact Data (3) Profile Data	(1) Performance of contract (natural persons)/ Legal obligation and Legitimate Interest (2) Necessary to comply with a legal obligation, including the requirement to notify you about changes (3) Legitimate interests (to keep our records updated and to monitor how customers use our products/services)
Administration of websites: To administer and protect the Graphisoft websites (including diagnosing problems, troubleshooting, data analysis, testing, system maintenance, support services, reporting and hosting of data) For the provision of administration and IT services, network security, to prevent information security and personal data breaches To comply with a legal obligation such as e-commerce, electronic communications and data protection legislation	(1) Identity Data (2) Contact Data (3) Technical Data (4) Usage Data	(1) Legitimate interests (for the provision of administration and IT services, network security, to prevent information security and personal data breaches) (2) Necessary to comply with a legal obligation such as e-commerce, electronic communications and data protection legislation
Data analytics: To use data analytics to improve our website, products/services, marketing, customer relationships and experiences To define types of customers for our products and services To keep our website updated and relevant To develop our business and to inform our marketing strategy	(1) Technical Data (2) Usage Data (3) Aggregated Data	Legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
Profiling: Incremental collection of data that may fall as personal data to	(1) Identity Data (2) Contact Data (3) Eligibility Data (4) Financial Data (5)	Legitimate interests (to define types of customers for our products and

evaluate certain personal aspects relating to you, in particular to analyse or predict aspects concerning your interests, behaviour, preferences To define types of customers for our products and services (e.g. trainings might be interested or recommended). To keep our website updated and relevant To develop our business and to inform our marketing strategy	Profile Data (6) Usage Data (7) Marketing and Communications Data (8) Transaction Data (9) Technical Data	services, to keep our website updated and relevant, to provide customized service and information, to develop our business and to inform our marketing strategy) NOTE: Graphisoft is not engaged in profiling that would pose a high risk or have a high impact on you. In other words, we do not carry out systematic and extensive evaluation of your personal aspects which is based on automated processing, and on which decisions are based that produce legal effects concerning or similarly significantly affect you.
Identifying: Who has given consent to processing for marketing purposes. Personal data concerning GSID are combined with technical data in order to identify who has given consent to the processing for marketing purposes	(1) Technical Data (2) Profile Data (3) Identity Data	Legitimate interest (improving marketing strategy by sending customized content)
Customized content: To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising Graphisoft serves you We will only use the personal data generated from profiling to send personalised content if the user give his/her consent for marketing purposes.	(1) Identity Data (2) Contact Data (3) Profile Data (4) Usage Data (5) Marketing and Communications Data (6) Technical Data	Consent
Electronic direct marketing: To contact you and send you via electronic means (such as e-mail, text messages, MMS, private messages etc.) newsletters, information about the goods or services of Graphisoft and Graphisoft Partners to make suggestions and recommendations to you about goods or services that may be of interest to you. Also to obtain feedback from you about our products and services for product development purposes.	(1) Identity Data (2) Contact Data (3) Profile Data	1. Consent
Transfer of personal data to Graphisoft Partners for direct marketing, electronic direct marketing and telemarketing purposes: To ensure Graphisoft Partners may also contact you and send you via electronic means (such as e-mail, text messages, MMS, private messages etc.) newsletters, information about their goods or services, to make suggestions and recommendations to you about goods or services that may be of interest to you	(1) Identity Data (2) Contact Data (3) Marketing and Communications Data	Consent
Electronic direct marketing for similar products to existing customers: With your consent to ensure that Graphisoft and Graphisoft Partners may contact you and send you via electronic means (such as e-mail, text messages, MMS,	(1) Identity Data (2) Contact Data (3) Profile Data	Consent

private messages etc.) newsletters, information about the goods or services of Graphisoft, to make suggestions and recommendations to you about goods or services that may be of interest to you		
Onboarding emails relating to the use of products purchased: To help you use the features of the products you buy properly by sharing useful information and recommending training courses	(1) Contact Data (2) Profile Data	Legitimate interest (Making the product easier to use and by doing so reducing the number of questions reported about its use)
Trial license optimisation: Sending a one-time email to those who have tried the trial license. The purpose is to measure the effectiveness of the trial license and to encourage those who have tried it to share their experiences	(1) Contact Data (2) Profile Data	Legitimate interest: (User experience improvement and product development)
Telemarketing: To ensure that Graphisoft and Graphisoft Partners may contact you via phone to share information about the goods of services of Graphisoft, to make suggestions and recommendations to you about goods or services that may be of interest to you. Also to obtain feedback from you about our products and services for product development purposes	(1) Identity Data (2) Contact Data (3) Profile Data	Consent
Market research: To contact you for market research and customer satisfaction purposes and also to measure the effectiveness of marketing campaigns	(1) Identity Data (2) Contact Data (3) Profile Data	Consent
Sharing of or publication of personal data with external agencies to combat fraud and piracy: To reduce fraud, software piracy, and protecting our customers as well as Graphisoft To protect our intellectual and industrial property rights and economic interests	(1) Identity Data (2) Contact Data (3) Eligibility Data (4) Profile Data (6) Usage Data (7) Transaction Data (8) Technical Data	Legitimate interest (to protect our intellectual and industrial property rights and economic interests).
Recruiting Managing recruitment related activities	(1) Identity Data (2) Contact Data (3) Profile Data	Consent of the data subject
Events With your consent to start and build up business relationship, update you about products, services and news	(1) Identity Data (2) Contact Data (3) Profile Data	Consent of the data subject
Customer success / lifecycle management: analyse customer interactions and measure success at each stage of the customer lifecycle	(1) Identity Data (3) Eligibility Data (6) Usage Data	Legitimate interest (to improve the usage of the product and customer experience as well as reducing churn)
Roadmap to success: assess the use of the product by the users and provide feedback	(1) Identity Data (6) Usage Data	Legitimate interest (to improve the product user's processes)
Complete data subject requests	(1) Identity Data (2) Contact Data (3)	Legal obligation

4. WHAT ARE COOKIES AND HOW DOES GRAPHISOFT USE THEM?

4.1. A cookie is a small piece of information that will be stored on your hard disk until you delete it. Like most websites and applications, we use our own cookies and those of third parties, together with similar technologies, to make our websites and applications work, to offer you customized and personalized service, and to learn more about our users and their likely interests. Cookies themselves don't hold personal information. They only have a unique alphanumeric identifier that sits on your browser. And in many cases, we won't be able to link the information we collect by using a cookie back to you. They can, however, enable us to link that information back to you and your personal information, for example, when you log in, or choose to register for a service, product or newsletter.

4.2. Graphisoft and third-party vendors including Google and Facebook use first-party and third-party cookies and related user behaviour tracking technologies to measure desktop software, mobile application and website usage; record different user activities in its software and on its web sites; and display advertisements based on the user's previously recorded activities. Graphisoft does not disclose any personally identifiable information to these third-party vendors. However, third-party vendors automatically receive IP addresses when activity tracking occurs. Graphisoft may connect user activity data gathered by third-party vendors with information collected by its websites and applications and such data may therefore become Profile or Usage Data.

4.3. You can set your browser so that the browser informs you about cookies or automatically prevents their storage. If you do not store our cookies, you will still be able to visit our website or use our services; however, the use of individual offers or features might be limited.

4.4. You can also prevent your data from being used by third-party vendors by installing browser extensions, such as: <http://www.aboutads.info/PMC>; <https://tools.google.com/dlpage/gaoptout/>. Or setting your preferences at web sites like: <http://www.youronlinechoices.com/uk/your-ad-choices>; <http://www.networkadvertising.org/choices/>; <https://www.google.com/settings/u/0/ads/anonymous>

4.5. For more information about the cookies please visit Graphisoft currently uses on its websites, please see our COOKIE POLICY at <https://graphisoft.com/cookie-policy>.

5. DOES GRAPHISOFT SHARE/DISCLOSE MY PERSONAL DATA?

(A) DISCLOSURE TO DATA PROCESSORS

5.1. Graphisoft as a business entity is subject to tax related obligations and also is subject to authority reviews, the course of which we could be obliged to share your data with the authorities. These obligations are imposed on Graphisoft by laws and regulatory decisions, we are legally bound to fulfil these requirements.

5.2. Graphisoft also works with companies that help us run our business. Among these are the subsidiaries of Graphisoft and also companies that are not linked to Graphisoft providing services for us. These services vary in subject and term: external consultants, professional advisers such as lawyers or auditors, technical support functions (IT and document storage providers, identity management and license management provider, professionals delivering customer support and sending emails on our behalf). These are called data processors are engaged in all cases based on written contract with appropriate guarantees to safeguard the security of the

data and the rights of the data subjects. In some cases, these companies have access to some of your personal information in order to provide services to you on our behalf. They are not permitted to use your information for their own purposes and we ensure by data processing contracts (including electronic format) that your data are being processed in accordance with the legal regulations.

5.3. Currently, Graphisoft is using the following data processors:

Name	Full postal address	Activity
Salesforce.com, Inc.	The Landmark at One Market, Suite 300, San Francisco, CA 94105, United States	CRM software service provider/licensor, marketing automation
The Rocket Science Group, LLC d/b/a MailChimp	675 Ponce de Leon Avenue NE, Suite 5000, Atlanta, GA 30308, United States	assistance with the conduct of e-mail marketing campaigns
Citrix Systems, Inc	4988 Great America Parkway Santa Clara, CA 95054 United States	organization and hosting of online events, webinars
Eventbrite Inc	155 5th Street 7th Floor San Francisco, CA 94103 United States	assistance with registration to Events
Google, Inc.	1600 Amphitheatre Pkwy, Mountain View, CA 94043, USA	processing of user traffic and analytics data
Facebook, Inc,	Facebook Headquarters 1 Hacker Way, Menlo Park, CA 94025, USA	processing of user data
WP Engine, Inc.	504 Lavaca Street, Suite 1000 Austin, Texas 78701 United States	data hosting
Microsoft Corporation	One Microsoft Way, Redmond, WA 98052-6399, USA	data hosting
Digital Ocean, Inc.	101 Ave of the Americas 10th Floor New York 10013, USA	data hosting
Marketo, Inc.	901 Mariners Island Boulevard Suite #500 (Reception) San Mateo, CA 94404, USA	marketing automation, including email campaigns, landing pages, profiling
Stripe Inc	510 Townsend Street, San Francisco, CA 94103, USA	facilitating payment transactions occurring in Graphisoft webshop
PayPal	2211 North 1st Street San Jose, CA 95131	facilitating payment transactions occurring in Graphisoft webshop
Greenhouse Software, Inc	18 West 18th Street, 11th Floor New York, NY 10011 USA	managing recruitment related activities
ActiveCampaign, LLC	1 N Dearborn St. 5th Floor Chicago, IL 60602	Managing sales leads
Khoros LLC	Pier 1, Bay 1A San Francisco, CA 94111	Providing the platform for Graphisoft Community

10Duke Software Ltd.	85-87 Bayham Street, Camden, London, NW1 OAG	Managing eligibility verifications (identity management) and software licenses
Amazon web services	410 Terry Avenue North, Seattle, WA 98109-5210	Cloud service provider
Flurry Inc	360 3rd St Ste 750, San Francisco, California, 94107, United States	Processing of user data
ChurnZero, Inc.	717 D Street, NW, 2nd Floor Washington, DC 20004	Provider of “ChurnZero” customer success software
OneTrust, LLC	1200 Abernathy Rd., Suite 600, Atlanta, Georgia 30328, USA	Provider of “OneTrust Platform”, which Graphisoft uses for consent management i.e. it processes data related to consent given by data subjects in case of data processing for marketing purposes
GoTo Technologies Ireland Unlimited	Company 77 Sir John Rogerson's Quay, Block C, Suite 207 Grand Canal Docklands Dublin 2, D02 VK60 Ireland	Provides “GoTo Webinar”, a webinar hosting platform
FastSpring	801 Garden Street, #201, Santa Barbara, CA 93101, United States of America.	Invoicing and payment processing of webshop customers

5.4. It is Graphisoft’s legitimate interest to prevent and respond to fraud, to defend our Websites and applications against attacks, to protect the property and safety of Graphisoft, our customers, users, the public. That is why Graphisoft Partners and specific companies are retained as data processors to assist us to combat piracy. Please note that it is Graphisoft’s legitimate interest from the above reasons not to identify our service providers. We share Your IP address, MAC address, software version and language with them exclusively for the above purposes.

5.5. Further to the above as indicated earlier Graphisoft provides its services in close cooperation with its subsidiaries therefore it is frequent that a Graphisoft subsidiary acts as data processor on behalf of Graphisoft.

(B) DISCLOSURE TO OTHER DATA CONTROLLERS

5.6. In other cases, we provide your data to other entities to use such data under their own name and for their own benefit. Sometimes we may need to do this to comply with a legal obligation (such as when we need to provide certain Transaction, Technical or Identify Data to the police or other authorities), and in other cases, we rely on other legal grounds, such as our legitimate interests or your written (including electronic means) consent.

5.7. Accordingly, if you consent to the sharing, as indicated above in the table, Graphisoft may also share your Identity Data, Contact Data and Marketing and Communications Data with Graphisoft Partners. Please note that we do not share your personal data for their own marketing purposes unless the consumer agreed to that sharing.

5.8. We may share or publish Aggregate Data that doesn't specifically identify you, such as statistical information about visitors to our websites or statistical information about how customers use our applications.

5.9. We require all third parties to respect the security of your personal data and to treat it in accordance with the law and the data processing contract if any. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

(C) MAKING YOUR DATA PUBLICLY AVAILABLE BY YOU

5.10. There are several places on Graphisoft's websites and applications that allow you to post comments, upload pictures, or submit content for others to see. Sometimes you might be able to limit who can see what you share, but there are some places where what you share can be seen by the general public or other members of the website or application. Please be careful when you share your personal information. Do not share anything you do not want publicly known unless you are sure you are posting it within a website or application that allows you to control who sees your post. Please note that when you post messages on certain user forums on our websites and applications, your email address or name may be included and displayed with your message.

5.11. To remove content you have shared on our websites and applications, please use the same website or application feature you used to share the content. If another user invites you to participate in shared viewing, editing, or commenting of content, you may be able to delete your contributions, but usually the user who invited you has full control. If you have questions or concerns about this, please contact us.

6. INTERNATIONAL TRANSFERS

6.1. As indicated above, we share your personal data within the Graphisoft Partners as follows:

1. You provide us with certain personal data when registering at our Websites. In such case, if you consent to the sharing, as indicated above in the table, Graphisoft as data controller may also share your Identity Data, Contact Data and Marketing and Communications Data with [Graphisoft Partners](#) too.
2. Graphisoft Partners use the online ordering system of Graphisoft and when using it may fill in certain personal information about you. This is always the decision of the given Graphisoft Partner. In such case the Graphisoft Partner is the data controller and Graphisoft is only data processor of the partner in order to provide the electronic ordering system.

These transfers will involve transferring your data outside the European Economic Area (EEA).

6.2. Also, since many of our external third parties are based outside the European Economic Area (EEA) (such as Microsoft, Inc., Digital Ocean, Inc., Salesforce.com, Inc.), so their processing of your personal data will involve a transfer of data outside the EEA.

6.3. Whenever we transfer your personal data outside of EEA, we contractually ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

1. we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
2. (b) where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
3. (c) where we use providers based in the US, we may transfer data to them if they are part of the Data Privacy Framework Program which requires them to provide similar protection to personal data shared

between the Europe and the US. For further details, see: <https://www.dataprivacyframework.gov/>

6.4. Please do contact us if you need further information on the specific mechanism used by us when transferring your personal data outside of EEA.

7. IS MY PERSONAL DATA SECURE, AND WHERE WILL IT BE STORED?

7.1. We understand that the security of your personal information is important. We provide reasonable administrative, technical, and physical security controls to protect your personal information. All information you provide us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot warrant or guarantee the security of your data transmitted to us; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. In case your data is provided by registering on our websites than we ensure that this registration is completed on a secured platform where we apply our security measures. In case you would like to have more information on the specific security measures taken in order to save your data than please contact us.

7.2. Also, we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

7.3. Finally, we have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7.4. Your personal information and data files are stored on Graphisoft's servers and the servers of companies we hire to provide services to us. As shown in clause 6 above, your personal information may be transferred across national borders because we have servers located worldwide and the companies we hire to help us run our business are located in different countries around the world (for example, Germany, Ireland, the United States). As mentioned in clause 6 above, the data that we collect from you may therefore be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order and the provision of support services.

8. HOW LONG WILL GRAPHISOFT HOLD AND USE MY PERSONAL DATA?

8.1. We only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

8.2. To determine the appropriate retention period for personal data, we take into account the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

8.3. More specifically, and without limiting the generality of the foregoing, by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for at least 5, in

certain cases 8 years after they cease being customers for tax, financial auditing, and record keeping purposes.

8.4. In some applicable circumstances you can ask us to delete your data: see the clause dealing with 'Right To Erasure' below for further information.

8.5. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR RIGHTS REGARDING YOUR PERSONAL DATA

Graphisoft has implemented the OneTrust Preference Center and Data Subject Request module, enabling you to exercise your rights regarding your personal data. You can submit your requests via this [LINK](#).

9.1. Your right to access

You have the right to access your personal data, including requesting information on whether Graphisoft processes your data, which data are processed, and you may also request a copy of the data that you or a third person provided to Graphisoft and which data is being processed by Graphisoft.

If you request that Graphisoft confirm whether or not Graphisoft processes your personal data, then you have the right that obliges Graphisoft to confirm that it processes your personal data, or does not process your personal data.

Your right to obtain confirmation whether Graphisoft processes (or does not process) your personal data:

1. does not include data that is anonymous;
2. includes the personal data that concern you;
3. does not include personal data that does not concern you; and
4. includes pseudonymous data that can be clearly linked to you.

Graphisoft shall give you access to your personal data if

1. you request Graphisoft to confirm whether or not it processes your personal data, and
2. Graphisoft confirms that it processes your personal data, and
3. you request access to your personal data.

Graphisoft shall provide you with a copy of your personal data if

1. you request Graphisoft to confirm whether or not it processes your personal data, and
2. Graphisoft confirms that it processes your personal data, and
3. you request a copy of your personal data.

If you request further copies of your personal data, then Graphisoft may charge you the fee of EUR10 or in equivalent local currency,- based on the administrative costs incurred in relation to the accommodation of such request.

Upon your request Graphisoft will give you access to the following information:

1. the purposes of the processing;
2. the categories of personal data concerned;
3. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
4. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

5. the existence of your right to request from Graphisoft rectification or erasure of your personal data or restriction of processing of personal data concerning you or to object to such processing;
6. the right to lodge a complaint with a supervisory authority;
7. where your data are not collected from you, any available information as to their source;
8. the existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

Please also note that many of our websites and applications allow you to access or edit your personal information by accessing the “[my_profile](#)”, or a similar feature of the website or application you are using. Likewise, you can access files or photos you have stored in our online services by logging in and using the functions they make available.

9.2. Your right to rectification

You have the right to the correction of your personal data without undue delay. This enables you to ask that any incomplete or inaccurate data we hold about you be corrected.

Your right to obtain rectification of your data that are inaccurate

1. does not include data that is anonymous;
2. includes the personal data that concern you;
3. does not include personal data that does not concern you; and
4. includes pseudonymous data that can be clearly linked to you.

Graphisoft shall rectify your personal data if

1. Graphisoft processes your personal data;
2. the personal data in question are inaccurate; and
3. you request the rectification of your personal data.

Graphisoft shall complete your personal data if

1. Graphisoft processes your personal data;
2. the personal data in question are incomplete; and
3. you request the completion of your personal data and if necessary you provide supplementary information for completion.

Graphisoft may verify any and all data provided to it. Graphisoft shall taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to communicate the rectification of your personal data to recipients of such personal data (if any). However, Graphisoft shall not communicate the rectification of personal data to recipients if the communication to such recipients is either impossible or involves a disproportionate effort.

Please also note that many of our websites and applications allow you to edit your personal information by accessing the “[my_profile](#),” or a similar feature of the website or application you are using. Likewise, you can edit files or delete photos you have stored in our online services by logging in and using the functions they make available.

9.3. Your right to erasure (‘right to be forgotten’)

Subject to certain conditions and in certain cases, you have the right to the erasure of your personal data. This means that you may request that we delete your personal data that we may have processed unlawfully or where

the use of your data is no longer needed for a purpose. Please keep in mind that Graphisoft may not be able to meet your request for specific legal reasons that will be notified to you, if applicable.

Graphisoft shall erase your personal data without undue delay if

1. Graphisoft processes your personal data, and
2. you request to obtain the erasure of your personal data, and
3. the personal data are no longer necessary to the purposes for which Graphisoft collected them;

Graphisoft shall erase your personal data without undue delay if

1. Graphisoft processes your personal data based on your consent, and
2. you request to obtain the erasure of your personal data, and
3. you withdraw your consent on which the processing of your data is based, and
4. there is no alternative legal basis for the processing of your data any further.

Graphisoft shall erase your personal data without undue delay if

1. the processing is based on being necessary for the purposes of the legitimate interests of Graphisoft or a third party, and
2. you object to Graphisoft's processing of your personal data, and
3. the legal ground for the processing of your personal does not override your objection.

Graphisoft shall erase your personal data without undue delay if

1. you request to obtain the erasure of your personal data, and
2. the processing by Graphisoft of such data is unlawful, or
3. if the erasure is required under applicable law, or
4. your data is collected in relation to the offer of an information society service.

Graphisoft shall, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to communicate the erasure of your personal data to recipients of such personal data (if any). However, Graphisoft shall not communicate the erasure of personal data to recipients if the communication to such recipients is either impossible or involves a disproportionate effort.

Please note that there are certain cases when you may not request erasure of your data. These reasons will be communicated to you if your request for erasure cannot be completed.

Please also note that many of our websites and applications allow you to edit or delete your personal information by accessing the "[my profile](#)", or a similar feature of the website or application you are using. Likewise, you can delete files or photos you have stored in our online services by logging in and using the functions they make available.

9.4. Your right to the restriction of processing

You may also request the restriction of the processing of your personal data. For instance, you may request that we suspend the processing of your personal where our use of the data is unlawful but you do not want us to delete it.

Your right to request the restriction of the processing of your personal data

1. does not include data that is anonymous;
2. includes the personal data that concern you;
3. does not include personal data that does not concern you; and

4. includes pseudonymous data that can be clearly linked to you.

Graphisoft shall restrict the processing of your personal data for a period to verify the accuracy of such data if you request to obtain the restriction of the processing of your personal data, and you contest the accuracy of such data.

Graphisoft shall restrict the processing of your personal data if you request to obtain the restriction of the processing of such data, the processing of which is unlawful, and you opposes the erasure of such data.

Graphisoft shall restrict the processing of your personal data if

1. you request to obtain the restriction of the processing of such data, and
2. Graphisoft does not need such data for the purposes of its processing, and
3. you require your data for establishment, exercise or defence against a legal claim.

Graphisoft shall restrict the processing of your personal data if

1. you object to the processing of your personal data that are necessary for the purposes of the legitimate interests that Graphisoft pursues, and
2. you wait to verify that the legitimate ground of Graphisoft's processing of your personal does not override your objection.

Graphisoft shall, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to communicate the restriction of processing of your personal data to recipients of such personal data (if any). However, Graphisoft shall not communicate such restriction to recipients if the communication to such recipients is either impossible or involves a disproportionate effort.

If Graphisoft restricts its processing of an your personal data, then it may

1. store such personal data,
2. process such personal data on the basis of your consent,
3. process the personal data for establishing, exercise or defend a legal claim, or for protecting the rights of another person.

In case you have obtained restriction of processing as per the above than you shall be informed by Graphisoft before the restriction of processing is lifted.

9.5. Your right to data portability

Where the processing of your data is either based on your consent (e.g. in respect of electronic direct marketing), or is necessary for the performance of a contract (e.g. customer registration data and data relating to your orders), and the processing is carried out by automated means, than you may request the provision of your personal data that you have provided to us in a standard format, and you may also request that such data be transferred to another entity.

Without prejudice to your rights above, you have the right to receive the personal data concerning you, which you provided to Graphisoft, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance (where technically feasible) from Graphisoft, where the processing is based on your consent, or is necessary for the performance of a contract, and the processing is carried out by automated means.

Your right to data portability

1. does not include data that is anonymous;
2. (b) includes the personal data that concern you;
3. (c) does not include personal data that does not concern you; and
4. (d) includes pseudonymous data that can be clearly linked to you.

9.6. Your right to object

Importantly, when we process your data on the basis of our legitimate interests as indicated in the above table, you may object to such processing and request that any of those activities be stopped. Similarly, you may opt-out of any of our direct marketing activities at any time by contacting Graphisoft's Data Protection Officer at gdpr@privacy.graphisoft.com, by adjusting your preferences in the privacy dashboard provided as part of some of our services (e.g. "[my_profile](#)"), or by using the 'unsubscribe' function at the end of our messages.

9.7. Your rights in relation to automated decision making and profiling

You have the right to request not to be the subject of automated decision-making including profiling where the decision produces legal effects or equally has a significant effect on you, and can insist on human intervention where appropriate.

There are exceptions to this right, which are, if the decision:

1. Is necessary for concluding or performing a contract
2. Is authorised by law
3. Is based on the data subject's explicit consent

9.8. Your right to withdraw consent

Also, you have the right to withdraw your consent at any time where we rely on your consent for processing your data (e.g. for certain electronic direct marketing purposes). You may do this by submitting your request through our webform: [FORM](#), or by adjusting your preferences in the privacy dashboard provided as part of some of our services (e.g. "[my_profile](#)"), or by using the 'unsubscribe' function at the end of our messages. Remember that the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal and that in some cases we may need time to process request.

Graphisoft shall, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to communicate your objection/withdrawal of consent to recipients of such personal data (if any). However, Graphisoft shall not communicate such restriction to recipients if the communication to such recipients is either impossible or involves a disproportionate effort.

9.9. Your right to lodge a complaint

Without prejudice to any other administrative or judicial remedy that you may have (such as the right to claim compensation for damages suffered as a result of Graphisoft's breach of the GDPR), you have the right to lodge a complaint with the Hungarian Data Protection and Freedom of Information Authority (**NAIH**) supervisory authority, or another data protection supervisory authority in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

The contact details of the NAIH are as follows: H-1055 Budapest, Falk Miksa utca 9-11; 1363 Budapest, Pf. 9; phone: +36 1 391-1400; telefax: +36 1 391-1410; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu.

In any case, we would highly appreciate the chance to deal with your concerns before you approach the regulatory authority above, so please contact us in the first instance if you have any problems.

9.10. Restrictions on the above rights

Please be advised that based on GDPR Member States are allowed to restrict by way of a legislative measure the scope of the rights you may have as per the above. In case such restriction is applicable in your respect, we will advise you accordingly when you contact us on exercising any of your above rights.

9.11. Contact details

If you wish to exercise any of your rights mentioned above, please contact us by submitting your query via this webform: [LINK](#)

9.12. No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a fee of EUR 30 or in equivalent local currency, if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

9.13. Verification of your identify

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

10. CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is effective as of the date indicated on the top. Earlier versions may be obtained by contacting us at gdpr@privacy.graphisoft.com. We will inform you in case of any changes to this Privacy Policy in due course.

11.SMS Terms of Service

Mobile opt-in, SMS consent, and phone numbers collected are not shared with any third parties/affiliates for marketing purposes.

By opting into SMS from a web form or other medium, you are agreeing to receive SMS messages from [3DCADCO](#). This includes SMS messages for conversations (external). Message frequency varies. Message and data rates may apply. Carriers are not liable for any delayed or undelivered messages. Reply STOP to any message to opt out. Reply HELP for assistance or contact us at

[305-438-0838/727-472-8333, info@3dcadco.com]

12. Contact Us

If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact us at:

3DCADCO

info@3dcadco.com . 305-438-0838/727-472-8333