

PRIVACY POLICY

Last updated: January 8th 2024

We respect your privacy. This Privacy Policy describes our policies and procedures on the collection, use, purpose and disclosure of your information when you use our website download Chemaxon Software or use or engage in any of our other services and it also informs you about your privacy rights and how you are protected by law.

Chemaxon Kft. of Hungary, 1138 Budapest, Váci út 133. (“Chemaxon, “we”, “us”, or the “Company”) is responsible for the processing of your Personal Information as described in this Privacy Policy and acts as the controller of such Personal Information.

What Personal Information we collect?

- **Contact data**, such as your first and last name, email address, billing and mailing addresses, professional title and company name, and phone number.
- **Account data**, such as the username and password, and any other information that you add to your account profile.
- **Feedback and communications data** based on your communication with us including but not limited to as part of responding to a survey or for troubleshooting or debugging purposes, during a trial and/or demo or otherwise.
- **Transactional data**, such as information relating to or needed to complete your orders on or through the services we provide, including order numbers and transaction history.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **Payment data**, such as information you provide in connection with your payment. Please note that we use third party payment processors to process payments made to us. As such, we do not retain any personally identifiable financial information such as credit card numbers. Rather, all such information is provided directly by you to our third-party processor. The payment processor’s use of your personal information is governed by their privacy policy.

Automatic data collection. Like most digital platforms, we, our service providers, and our business partners may automatically log information about you, your computer or mobile device depending on what you’re using, and your interaction over time with our services, such as:

- **Device data**, such as IP address (and, as such, general location information such as city, state, or geographic area), computer/device and usage information such as operating system and platform, time zone information, product version, session duration data, mode of tool usage and similar.

Additionally, Chemaxon uses Usage Data to analyze and enhance the user experience and trends as a whole to improve our products. We do not use it for marketing purposes. Usage Data will be shared with the members of the product development team at Chemaxon, on a need-to-know basis. We do not share or disclose it with third parties.

For what purposes and on what basis do we process your Personal Information?

Legal bases for processing

GDPR requires to ensure we have a legal basis for each purpose that we use your Personal Information for. These are the following:

Where we need to perform a contract, we are about to enter into a contract or have entered into a contract with you (“**Performance of Contract**”).

Where we need to comply with a legal or regulatory obligation (“**Legal Obligation**”).

Where we have your specific consent to carry out the processing for the Purpose in question (“**Consent**”).

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.

Purpose	Personal Information	Legal Basis
User or subscriber Registration: to register you as a user or a subscribe.	<ul style="list-style-type: none"> • Contact data • Marketing data 	Performance of contract
Processing orders and managing payments: to process and deliver your orders, manage payments, manage subscriptions, including informing you about the expiration of your subscription.	<ul style="list-style-type: none"> • Contact data • Account data • Transactional data • Payment data • Device data 	Performance of contract and legal obligation

Authentication as a user or subscriber	<ul style="list-style-type: none"> • Contact data • Marketing data 	Performance of contract
Service delivery and operation: provide, operate and maintain our services, provide customer service.	<ul style="list-style-type: none"> • Contact data • Account data • Feedback and communications data • Transactional data • Payment data • Device data 	Performance of contract and Consent
Direct marketing: to send you direct marketing communications and personalize these messages based on your needs.	<ul style="list-style-type: none"> • Contact data • Marketing data • Feedback and communications data 	Consent

Retention of your Personal Information

Security of processed Personal Data.

The security of your personal information is important. We employ reasonable administrative, technical, and physical security controls to protect your personal information. All information you provide us is stored on secure servers. However, please note that no transmission over the internet is 100% secure. In case we learn about a personal data breach, we will contact you without delay. If you would like to learn more about our security processes, please contact us directly.

How long we store your Personal Information?

We retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.

Cookies

For more information about which cookies and other tracking technology we use, see our Cookie Policy. We will also store a record of your preferences in respect of the use of these technologies in connection with the Service.

Sharing With Third Parties

We do not sell, rent, distribute or otherwise make Personal Information commercially available to any third party, except that we may share information with our service providers for the purposes set out in this Privacy Policy.

Chemaxon works with companies that help us run our business. Among these are the subsidiaries of Chemaxon too. Additionally, there are companies that provide certain services to us. These services vary in subject and term: external consultants, professional advisers such as lawyers or auditors, technical support functions. These are called data processors and 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.

These third parties are:

Data processor	Seat of data processor	Activity
<p>Amazon Services, (AWS)</p>	<p>Web Inc. Avenue John F. Kennedy 38, Luxembourg, 1855, Luxembourg</p>	<p>Hosting service provider.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, AWS ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>AWS Privacy (amazon.com)</p> <p>AWS GDPR DPA.pdf (awsstatic.com)</p>

Data processor	Seat of data processor	Activity
		Supplementary Addendum to the AWS GDPR DPA.pdf (awsstatic.com)
AppVision Kft.	1087 Budapest, Könyves Kálmán körút 48-52. I. em. E/121.	Business Central consultant. The processor does not process personal data outside the EU in the course of the services. Further information: Privacy notice (appvision.hu)
Atlassian Pty Ltd (Jira)	Sydney (Global HQ) Level 6, 341 George Street, Sydney, NSW 2000, Australia +61 2 9262 1443	Project management services. Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR. In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Atlassian ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021. Further information: Privacy Policy Atlassian Data Processing Addendum Atlassian Data Transfer Impact Assessment Atlassian
Deloitte Könyvvizsgáló és Tanácsadó Kft.	1068, Budapest, Hungary Dózsa György út 84/C.	Providing auditing services The processor does not process personal data outside the EU in the course of the services.
DocuSign International Limited	5 Hanover Quay Grand Canal Dock Dublin D02 VY79, Ireland	E-signature services. Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR. In relation to the collection of personal data in EU member states and the transfer and processing of personal data within the DocuSign group of companies to third

Data processor	Seat of data processor	Activity
		<p>countries, DocuSign ensures the protection of personal data through binding corporate rules. Transfers outside the DocuSign group of companies to third countries will only be made to organisations that agree to comply with the requirements of the binding corporate rules or use other valid alternatives under data protection legislation.</p> <p>Further information:</p> <p>Privacy Notice DocuSign</p> <p>DATA PROTECTION ATTACHMENT FOR DOCUSIGN SERVICES DocuSign</p> <p>Trust Center BCR Controller Policy DocuSign</p> <p>Trust Center BCR Processor Policy DocuSign</p>
Dovetail Research Pty. Ltd.	2010 Sydney, Level 1, 276 Devonshire Street, Australia	<p>Provision of UX (user experience) research tool.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Dovetail ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Privacy Policy (dovetailapp.com)</p> <p>Our GDPR commitment (dovetailapp.com)</p> <p>Data Processing Agreement (dovetailapp.com)</p> <p>New SCCs & the GDPR (dovetailapp.com)</p>
FaceUp Technology s.r.o.,	567/33, 602 00 Brno, Czech Republic	<p>Complaint handling software</p> <p>The processor does not process personal data outside the EU in the course of the services.</p>
Fluenta Europe Kft. Reg. No: 01-09-711910, Hungary	1114 Budapest, Bartók Béla út 43-47., Hungary	<p>Vendor assessment, recruitment and contracting software</p> <p>The processor does not process personal data outside the EU in the course of the services.</p>

Data processor	Seat of data processor	Activity
Freshworks Inc.	2950 S. Delaware Street, Suite 201. San Mateo CA 94403., USA	<p>IT support ticket system</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Freshworks ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Refreshing Cloud Business Suite Privacy Notice Freshworks Inc</p>
GitLab Inc.	Unit 13 Classon House Dundrum Business Park, Dundrum, Dublin 14, Ireland	<p>Code repository</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, GitLab ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>GitLab Privacy Statement GitLab</p>
Google Ireland Limited (Google Workspace)	Google HQ 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, (650) 253-0000	<p>Provision of Google workspace (Gmail, Drive, Calendar, Meet, Chat, Docs, Sheet, Slides).</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Google ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p>

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		<p>Further information:</p> <p>Privacy Policy – Privacy & Terms – Google</p> <p>Data transfer frameworks – Privacy & Terms – Google</p>
<p>Greenhouse Software</p>	<p>18 W 18th Street, 11th Floor New York, NY 10011</p>	<p>Recruitment software</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Greenhouse ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Additionally, Chemaxon and Greenhouse concluded a separate DPIA to ensure the adequate level of personal data protection.</p> <p>Further information:</p> <p>https://www.greenhouse.com/uk/gdpr</p>
<p>Hoofdvestiging Nederland (Okta)</p>	<p>Strawinskylaan 4117, 3rd Floor 1077 ZX Amsterdam, Netherlands</p>	<p>Access and identification service - this is how employees access all interfaces.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Okta ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Okta Privacy Policy Okta</p>
<p>Microsoft Deutschland GmbH</p>	<p>Konrad-Zuse-Str.1</p>	<p>Business management system.</p>

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(Dynamics 365 Business Central)	85716 Unterschleißheim , Germany	<p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Microsoft ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Microsoft Products and Services Data Protection Addendum</p>
MongoDB, Inc. (Atlas)	Building 2 Number One Ballsbridge, Shelbourne Rd, Ballsbridge, Dublin 4, D04 Y3X9, Ireland	<p>Allowing cloud installations.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Atlas ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Privacy Policy MongoDB</p>
Okta UK Limited (Auth0)	3rd Floor Union House 182-194 Union Street London, SE1 0LH, UK	<p>Identification service.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Auth0 ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Privacy Policy - Auth0</p>

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OwnBackup.com, Inc.	940 Sylvan Ave, Englewood Cliffs New Jersey, 07632, USA	<p>General backup.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, OwnBackup ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Privacy Notice - OwnBackup</p> <p>OwnBackup-Pre-Signed-DPA-2021-02.pdf</p>
PagerDuty, Inc.	600 Townsend Suite 200 San Francisco, CA 94103, USA	<p>Availability software.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, PagerDuty ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Privacy Policy PagerDuty</p> <p>Data Processing Addendum PagerDuty</p>
ProductBoard, Inc.	612 Howard Street, 4th Floor, San Francisco CA 94105, USA	<p>Project management tool.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, ProductBoard ensures the protection of personal data by means of a model contract (standard</p>

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		<p>contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Privacy Policy 2021 Productboard</p>
Progen Kft.	Hungary, 1118, Budapest, Homonna utca 8/A.	<p>Business management system.</p> <p>The processor does not process personal data outside the EU in the course of the services.</p> <p>Further information:</p> <p>Progen data processing notice – webpage public 220708.docx.pdf</p>
Rackforest Zrt.	Hungary, 1132 Budapest, Victor Hugo utca 11., 5. emelet	<p>Server rental services.</p> <p>The processor does not process personal data outside the EU in the course of the services.</p> <p>Further information:</p> <p>Data protection guidelines - RackForest</p>
RealtimeBoard Inc. dba Miro	Stadhouderskade 1, 1054 ES Amsterdam, Netherlands	<p>Project management tool.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Miro ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Terms of Service, Online Whiteboard Miro</p>
SFDC Austria GmbH (SalesForce)	Regus Business Center Icon Tower 24 / 3rd floor Wiedner Gürtel 13	<p>Operation of customer relationship management (CRM) system.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that</p>

Data processor	Seat of data processor	Activity
	1100 Vienna, Austria Sales: 0800 292027	<p>do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Salesforce ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Salesforce Privacy Statement - Salesforce EMEA</p> <p>data-processing-addendum.pdf (salesforce.com)</p> <p>EU-Data-Transfer-Mechanisms-FAQ.pdf (salesforce.com)</p>
Slack Technologies Limited	One Park Place, 4th floor, Hatch Street Upper, Saint Kevin's, Dublin 2, Ireland	<p>Provision of communication services.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Slack ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p> <p>Privacy Policy Legal Slack</p> <p>Data Processing Addenda Legal Slack</p>
The Rocket Science Group LLC d/b/a Mailchimp	Atlanta, 675 Ponce De Leon Ave NE #5000, USA	<p>Sending of marketing newsletter.</p> <p>Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR.</p> <p>In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Mailchimp ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021.</p> <p>Further information:</p>

Data processor	Seat of data processor	Activity
		Global Privacy Statement Intuit Mailchimp Data Processing Addendum Preview Mailchimp Mailchimp and European Data Transfers Mailchimp
United Consult Zrt.	Hungary, 1117 Budapest, Bogdánfy Ödön utca 6.	Salesforce consultant. The processor does not process personal data outside the EU in the course of the services. Further information: Data protection agreement - United Consult (united-consult.hu)
WhiteSource Ltd. (Mend)	93 Summer St. Boston, Massachusetts 02110, USA	Application security and vulnerability testing. Personal data is also processed by the service provider in the course of its services in countries outside the EU that do not ensure an adequate level of data protection as defined by the GDPR. In connection with the collection of personal data in EU member states and the transfer and processing of such data to third countries, Mend ensures the protection of personal data by means of a model contract (standard contractual clauses) in the form approved by the EU Commission Decision 2021/914 of 4 June 2021. Further information: Privacy Policy - Mend

International Transfers of Personal Information

The transfer of your Personal Information may involve your Personal Information being sent outside of the EEA, to locations that may not provide the same level of protection as those where you first provided the information.

However, we will only transfer your Personal Information outside of the EEA:

- where the transfer is to a place that is regarded by the European Commission as providing adequate protection for your Personal Information; or

- where we have put in place appropriate safeguards to ensure that your Personal Information is protected (for example where both parties involved in the transfer have signed standard data protection clauses adopted by the European Commission).

Children

Chemaxon products and services are not intended for use for children. We do not knowingly collect, store or in any other means process data of persons under 16 years of age. If you believe we have collected personal information of a child, please contact us and provide sufficient data about the use case.

Your Rights under the GDPR

We undertake to respect the confidentiality of your Personal Information and to guarantee you can exercise your rights.

You have the right to:

- **Request access to your Personal Information.** The right to access, update or delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Information directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you. This also enables you to receive a copy of the Personal Information we hold about you.
- **Request correction of the Personal Information that we hold about You.** You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Object to processing of your Personal Information.** This right exists where we are relying on a legitimate interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to our processing of your Personal Information on this ground.
- **Request erasure of your Personal Information.** You have the right to ask us to delete or remove Personal Information when there is no legitimate reason for us to continue processing it.
- **Request the transfer of your Personal Information.** We will provide to you, your Personal Information in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with You.
- **Withdraw your consent.** You have the right to withdraw your consent on using your Personal Information. If You withdraw your consent, we may not be able to provide you with access to certain specific functionalities of the services we provide.

Exercising of Your GDPR Data Protection Rights

You may exercise your rights of access, rectification, cancellation and opposition by contacting us or the National Authority. Please note that we may ask you to verify your identity before responding to such requests. If you make a request, we will try our best to respond to you as soon as possible.

You may write us:

- to the following email address: legal@chemaxon.com
Address: Hungary, 1138 Budapest, Váci út 133.
- by contacting the National Authority at:

National Authority for Data Protection and Freedom of Information (NAIH)

Mailing Address: 1363 Budapest, Pf.: 9.
Head office: 1055 Budapest, Falk Miksa utca 9-11
Phone: +36 (1) 391-1400
E-mail: ugyfelszolgalat@naih.hu

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it.

Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). You are advised to review this Privacy Policy periodically for any changes.