Autodesk Group

UK PROCESSOR BCR SUMMARY

The Autodesk Group has approved binding corporate rules for Processors ("EU BCR-P"), which are an internationally recognized standard providing adequate protection of personal data in multinational companies. The EU BCR-P were reviewed and approved by data protection authorities across Europe. A copy of Autodesk's EU BCR-P is available at Privacy | Autodesk Trust Center

Autodesk has entered into the UK BCR Addendum to the approved EU BCR-P. The UK BCR Addendum is a formal legal mechanism which extends the scope of the EU BCR to include all transfers of personal data under the UK GDPR. Together, the EU BCR-P, the UK BCR-P Addendum and this UK BCR-P Summary form Autodesk's UK BCR ("**UK BCR-P**"). Further information about the UK BCR addendum process is available on the UK Information Commissioner's Office ("**ICO**") website at https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/guide-to-binding-corporate-rules/a-uk-bcr-addendum/

The purpose of this UK BCR-P summary is to provide information to individuals whose personal data is transferred under the UK BCR-P so that they know how their information is processed, what rights they have under the UK BCR-P and how to enforce them.

Terms not defined here have the meaning provided within the EU BCR-P.

Contact details for
queries about
Autodesk's UK BCR

All queries about Autodesk's UK BCR-P, EU BCR-P or about Autodesk Privacy matters generally can be directed to Autodesk's Director EMEA Privacy Counsel & DPO via email to privacy.questions@autodesk.com.

UK-based individuals can also contact Autodesk Limited (which is the Lead UK BCR Member) using the contact details below:

 Autodesk Limited, Talbot Way, Small Heath, Business Park Birmingham, B10 0HJ, United Kingdom or privacy.questions@autodesk.com.

Description of data transfers covered by Autodesk's UK BCR

A description of the data transfers covered by Autodesk's BCRs (including the UK BCR) can be found in Part 1 – Introduction and Scope of the EU BCRs, under the heading "5. Scope of the Policy" (EU BCR).

In summary:

- The BCRs apply to all Autodesk Companies (and enterprises engaged in a joint economic activity with Autodesk Companies) that have agreed to be bound by the UK BCRs.
- Autodesk Companies must comply with the UK BCR-P when
 processing Personal Data as processors or sub-processors in the
 course of providing services to a an individual or controller entity
 that is not an Autodesk Company ("Customer") and is
 established in the UK or otherwise subject to UK Data Protection
 Law ("Customer Personal Data").
- Ends users are the relevant category of data subjects and Customer Personal Data include personal details, customer records and employment details.
- The BCR-P covers both automated and manual types of Processing.

List of countries where personal data is transferred to under the UK BCR

The countries where personal data is transferred to under Autodesk's BCRs (including the UK BCR) are listed in Appendix 2 (processing schedule) of the EU BCR. The countries are as follows:

- Australia
- Brazil
- India
- Jordan
- Mexico
- Saudi Arabia
- South Korea
- Singapore
- Turkey
- USA

The rights of individuals whose personal data is transferred under the UK BCR, including third party beneficiary rights, and the means to exercise those rights

The rights of individuals whose personal data is transferred under the Autodesk's BCR (including the UK BCR) are as described in the following sections of the EU BCR:

- Part 2: Rule 1 (Cooperation with the customer)
- Part 3: Third Party Beneficiary Rights

Responsibility towards the controller

As set out in Part 1, section 7 "Responsibility towards the Customer" of the EU BCR-P and specifically in a UK context, if an Autodesk Company fails to comply with the data protection obligations imposed on it by a Data Processing Addendum that it has entered into with a Customer, that Customer may be in breach of *UK Data Protection Law* and in turn the Autodesk Company may face a claim for breach of contract, which may result in the payment of damages or other judicial remedies.

In addition, a Customer that has entered into a Data Processing Addendum with an Autodesk Company that incorporates the UK BCR-P will be entitled to enforce the Policy against:

- any Autodesk Company processing Customer Personal Data on behalf of that Customer in respect of a breach of the Policy caused by that Autodesk Company and,
- against Autodesk Limited in case of a breach of the Policy or of the Data Processing Addendum by Autodesk Companies established outside of the UK; or the Sub-processing Agreement by any Third-Party Entity sub-processor established outside of the UK.

How to complain to Autodesk BCR Members

Details of how to complain to Autodesk about the BCRs (including the UK BCR) is as set out in Rule 7 (Complaint Handling) of the EU BCR-P

As indicated in Rule 7 of the EU BCR-P, all complaints made under the BCRs can be brought to the attention of the Director EMEA Privacy

Counsel & DPO who is responsible for complaints using the contact details provided within the EU BCR.

Specifically in a UK context, concerned data subjects also have the right to lodge a complaint arising under the UK BCRs, without first exhausting the complaint handling process, to:

- · Autodesk Limited, using the contact details provided above
- the UK Information Commissioner, and
- the courts of the UK.

How to complain to the UK Information Commissioner's Office about Autodesk's UK BCR

Individuals have the right to make a complaint about Autodesk's UK BCR to the ICO – for more information please see https://ico.org.uk/forthe-public/how-to-make-a-data-protection-complaint/

Information Commissioner's Office

Wycliffe House Water Lane

Wilmslow Cheshire SK9 5AF

Telephone: 0303 123 1113 Textphone: 01625 545860

Monday to Friday, 9am to 4:30pm

How to bring a claim in the UK courts against Autodesk Limited for redress and, where appropriate, compensation for a breach of the UK BCR Addendum by Autodesk Limited and any Non-UK BCR Member

The individual court systems provide guidance on how to bring a claim in England and Wales, Scotland and Northern Ireland.

Citizens Advice provides information on taking legal action in <u>England</u> and <u>Wales</u>, <u>Scotland</u> and <u>Northern Ireland</u>.

Finally, you can find further information at:

- www.justice.gov.uk (England and Wales)
- www.scotcourts.gov.uk (Scotland)
- www.courtsni.gov.uk (Northern Ireland)