

# Privacy Policy for California Residents

*Effective Date: October 1, 2020*

*Last Updated: June 27, 2022*

This Privacy Policy for California Residents (“California Policy”) supplements and is expressly made part of the information contained in AspenTech’s Privacy and Security Policy and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this California Policy to comply with the California Consumer Privacy Act of 2018 (“CCPA”). Any terms defined in the CCPA have the same meaning when used in this California Policy. A reference to “AspenTech,” “we,” or “us,” is a reference to Aspen Technology Inc.

## Personal Information That We Collect and Disclose

AspenTech may have collected and disclosed for a business purpose the following categories of personal information or “data” within the last 12 months (summary table based on the CCPA enumerated category):

Category	Description
Identifiers	On some of our webpages, you can request information, subscribe to marketing or support materials, register for events, apply for jobs, or obtain technical support. The types of data you provide to us on these pages may include name, address, phone number, email address, user IDs and passwords, and contact preferences.
Personal Information Categories – as listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	In addition to the examples above, AspenTech may collect certain information, including but not limited to Social Security number, passport or state identification number, education and employment history for job applicants. We also collect billing information that you used to purchase our services or products.
Protected classification characteristics under California or federal law	For job applicants, we may lawfully collect special categories of data such as race, ethnic origin, gender, veteran status, marital status, citizenship, or other similar information.

Professional or employment-related information	In some of our forms we may ask you for your current job title and functional area. For job applicants we may ask for current and former job history, job qualifications and skills or other similar information.
Internet or other similar network activity	AspenTech collects and analyzes web site usage information; that may include the pages visited on the AspenTech websites, unique URLs visited, browser type, device type, network provider and IP address. Most usage information is collected via cookies or other analysis technologies.
Audio, electronic, visual, thermal, olfactory or other similar information	AspenTech may collect information provided by you via customer support portals, feedback and chat communications, webcasts and similar tools.
Commercial Information	We will collect the information about the products or services that you purchased from us.

## How We Use Your Personal Information

We may use, or disclose the personal information we collect for one or more of the following business purposes:

- Understanding your preferences and providing marketing and promotional materials
- Organizing and conducting events
- Contacting you regarding your interest in events, trainings and webinars or related content that you have registered for
- Administering surveys to improve our products and services
- Providing goods and services that have been contracted for
- Communicating with you about our services, including order management and billing
- Reviewing job applicant credentials and making hiring decisions
- Providing technical support on AspenTech products
- Preventing, detecting and fighting fraud or other illegal or unauthorized activities
- Running our business and planning for the future
- For any other legitimate interest

## **Sharing Personal Information**

Sometimes we might share your personal information with our group companies or our contractors, service providers and agents to carry out our obligations under our contract with you or for a business purpose. When we share information, we require those companies and other entities to keep your personal information confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

We may share your personal information with the following:

- Subsidiaries and affiliates
- Contractors and service providers
- Data aggregators

We may ask for your consent to share your information with third parties. In any such case, we will make it clear why we want to share the information.

## **Sales of Personal Information**

In the preceding 12 months, AspenTech has not sold personal information.

## **Your Rights and Choices under the CCPA**

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights.

### Right to Know About Personal Information Collected, Disclosed, or Sold:

To the extent permitted by the applicable law, you have the right to be informed about AspenTech's practices regarding the collection, use, disclosure, and sale of personal information and to be informed, in response to a verifiable consumer request, of the specific pieces of your personal information collected and used by AspenTech over the past 12 months.

### Right to Request Deletion of Personal Information:

To the extent permitted by the applicable law, you have the right to request that AspenTech delete any personal information that we have collected from you, as

well as direct any service providers to delete the personal information, unless excepted.

Right to Non-Discrimination:

You have a right to receive non-discriminatory treatment by AspenTech for the exercise of the privacy rights conferred by the CCPA. This includes denying goods or services, charging different prices, or providing a different level or quality of service. We may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value.

## **Exercising “Your Right to Know” or “Right to Request Deletion”**

To exercise your Right to Know or Right to Request Deletion described above, please submit a verifiable consumer request to us by either:

**calling us at:** (+1) 833-250-3493; or

**send email to:**

Job applicants: [esar<@>aspentech.com](mailto:esar@aspentech.com)

All others: [csar<@>aspentech.com](mailto:csar@aspentech.com)

Only you, or an Authorized agent, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

The verifiable consumer request should:

- provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an Authorized agent; and
- describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

## **Identity Verification**

AspenTech will make a determination of what pieces of personal information to use for verification based on what information it is holding for you. We will endeavor not to collect any additional personal data from you unless absolutely necessary to verify your identity.

The following may apply:

- we will need to know your full name and email address associated with AspenTech;
- you will be asked to log in to your AspenTech customer support account, if applicable;
- the following methods may be used by us to verify your identity: email validation, mobile number validation, fact-based questions, in-person document identity verification;
- we may require you to verify your identity by providing a “signed” declaration under penalty of perjury.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

## **Using Authorized Agent**

“Authorized agent” is a natural person, or a business entity registered with California Secretary of State to conduct business in California that you can authorize to make a request under the CCPA on your behalf (see Exercising Your Right to Know or Right to Request Deletion section). When you use an Authorized agent to submit your request and in accordance with the applicable law, we may require:

- you to provide the Authorized agent written permission to do so;
- Authorized agent to verify their own identity directly with us, and include a signed written authorization in their request to us;

- you to confirm directly with us that you provided the Authorized agent permission to submit the request.

We may deny a request from an agent that does not submit adequate proof that they have been authorized by you to act on your behalf.

## **Response Timing**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded.

## **Changes to This California Policy**

AspenTech reserves the right to amend this California Policy at our discretion and at any time. When we make changes to this policy, we will post it on our website and update the policy's last updated date. Your continued use of our website following the posting of changes constitutes your acceptance of such changes.

## **Contact Us**

You can ask questions or comment about this California Policy and/or request it in an alternative format by:

**email:** [PrivacyInfo<@>aspentech.com](mailto:PrivacyInfo@aspentech.com) or

**mail:**

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