

PERMISSIO PRIVACY POLICY

Effective Date: November 4, 2021

Date of Last Revision: November 4, 2021

The application Permissio (the “App”) is distributed by PCL IP Management, Inc. (referred to herein as “Permissio,” “us,” “we,” or “our”). The App is used as a diagnostics tool to review applied permissions within the Autodesk Forge Platform (the “Services”).

This privacy policy (the “Privacy Policy”) is designed to inform you of our policies regarding the collection, use, and disclosure of information when you use our App and Services and the choices you have associated with that information.

From time to time, we may change this Privacy Policy. If we do, we will post an amended version. Please review this Privacy Policy periodically.

Information Collection and Use

We collect several different types of information for various purposes from you through your use of the App and Services.

Types of Information Collected

Personal Data

While using our Services we ask you to provide us, or we collect certain personal information that can be used to identify you (“Personal Data”). Personal Data may include, but is not limited to:

- *Purchasing a License.* When you purchase a license to use the App, you will provide us with your name, email address, telephone number, and company name and location.
- *Payment Information.* We do not collect or store your payment information. You will provide our third-party payment provider, Stripe, with your payment information including your credit card information for payment for your use of the App. The information you provide to Stripe when submitting your payment is collected and used as set forth in the Stripe Privacy Policy.

Use of Data

We use your Personal Data to provide you the Services on our App, and to receive and respond to your inquiries about products, services, warranties, or support. To address your questions, we may subsequently need to request additional information. We may use your Personal Data to contact you about products or additional services that we believe may be of interest to you. In addition, we may use the collected data for the following purposes:

- To provide and maintain the Services
- To notify you about changes to our Services
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Services
- To monitor the usage of the Services
- To detect, prevent, and address technical issues

Disclosure of Data

We may share the Personal Data we collect about you to provide a product or service you have requested.

We may share your Personal Data with third-party licensors and service providers that perform tasks on our behalf related to our business, such as order fulfillment services, analytical services, book-keeping services, marketing services that may provide you advertising on our behalf, customer service, employment services, or social media services. For example, we use KeyGen, a license management company, and Stripe, a payment processor.

We may disclose your Personal Data as required or appropriate by law, including to comply with legal process and to respond to requests from public and government authorities; to enforce our terms and conditions, including investigations of potential violations thereof; to detect, prevent, or otherwise address fraud, security, or technical issues; and to protect our operations.

Permissio may also disclose your Personal Data in the good faith belief that such action is necessary:

- To comply with a legal obligation
- To protect and defend the rights or property of Permissio
- To prevent or investigate possible wrongdoing in connection with the Services
- To protect the personal safety of users of the Services or the public
- To protect against legal liability

We may otherwise share or disclose your Personal Data with your consent or when you opt in to share your Personal Data with a designated third party.

We may also share your Personal Data with a company that acquires our business, whether through merger, acquisition, bankruptcy, dissolution, reorganization, or other similar transaction or proceeding.

Cookies Data

We do not use “cookies.”

For your information, “Cookies” are a small text file transferred to your device, along with similar technologies (e.g., internet tag technologies, web beacons, embedded scripts). Generally, these technologies are used to:

- Make the user experience more user friendly;
- Remember your preferences (e.g., browsing language, usage preferences); or
- Help an app understand and improve how visitors use an app, including which pages and products are viewed most frequently.

When cookies are used, they can be blocked by changing your internet browser settings to refuse all or some cookies.

You can find out more about cookies and how to manage them generally by visiting www.AboutCookies.org.

You can understand which third parties have currently enabled cookies for your browser or mobile device and how to opt-out of some of those cookies by accessing the [Network Advertising Initiative’s website](#) or the [Digital Advertising Alliance’s website](#). For more information on mobile specific opt-out choices, visit the [Network Advertising Initiative’s Mobile Choices website](#).

Interest-Based Ads

Unaffiliated third parties may use cookies and other technologies on third-party websites to collect information about your online activities over time and across different websites you visit in order to provide you with interest-based advertising. You can generally opt-out of receiving interest-based advertisements from members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). When you opt-out using these links, please note that you may still receive advertisements. However, advertisements will not be personalized based on your interests.

Marketing Communications and Choices

Wherever you are located, we may send you marketing communications based on the preferences you have expressed. You may opt out of marketing-related emails by clicking on a link at the bottom of each such email, or by contacting us through one of the methods provided in the “Contact Us” section below and putting “Marketing Opt-Out” in the subject line.

Do Not Track

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, the App does not currently interpret, respond to, or alter its practices when it receives “Do Not Track” signals.

Security of Data

The security of your Personal Data is important to us, and we strive to use commercially reasonable measures to protect your Personal Data. You acknowledge that no method of transmission over the Internet or method of electronic storage is 100% secure. Accordingly, we cannot ensure the absolute security of your Personal Data.

Service Providers

We may employ third-party companies and individuals to facilitate our Services (“Service Providers”), to provide the Services on our behalf, or to assist us in analyzing how our Services are used. We take commercially reasonable measures to contract with service providers that implement commercially reasonable protections when processing your Personal Data.

Links to Other Apps

Our Services may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party’s website. We encourage you to review the privacy policy of every website you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party website or services.

Notice to Residents of Europe and the United Kingdom

Permissio recognizes the importance of protecting the privacy of our customers and the users of the App. As such, we will always ensure that we have a lawful basis for processing your Personal Data.

Permissio’s offices are located at 12730 28th Ave NE, Seattle, WA 98125. Permissio is the data controller of all Personal Data collected from residents of the European Economic Area (EEA) or the United Kingdom.

Our Legal Basis for Collecting, Storing, and Processing Your Personal Data

We will collect and process your Personal Data based on one of the following legal bases:

Consent. We may process your Personal Data with your consent. You have the right to withdraw your consent at any time.

Performance of a Contract. We may process your Personal Data if it is necessary for the performance of a contract to which you are a party.

Comply with a Legal Obligation. We may process your Personal Data if it is necessary to comply with a legal obligation to which we are subject.

Legitimate Interests. We may process your Personal Data if doing so is necessary for our legitimate interests and those legitimate interests are not overridden by your interests or fundamental rights and freedoms.

Your Legal Rights

Under the GDPR, you have the following rights related to Permissio’s use of your Personal Data.

Right	Description of your right
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Access	A right to access Personal Data held by us about you, as well as information about how we are using your data.
Rectify	A right to require us to rectify any inaccurate Personal Data held by us about you.
Delete	A right to require us to erase Personal Data held by us about you, and where the Personal Data has been made public, for other controllers processing the Personal Data to also erase links to, or copy or replication of, such Personal Data. This right will only apply where (for example): we no longer need to use the Personal Data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your Personal Data based on your consent; or where you object to the way we process your data (in line with the right to restrict use below).
Restrict Use	A right to restrict our processing of Personal Data held by us about you. This right will only apply where (for example): you dispute the accuracy of the Personal Data held by us; or where you would have the right to require us to erase the Personal Data but would prefer that our processing is restricted instead; or where we no longer need to use the Personal Data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.
Data Portability and Transfer	A right to receive Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organization, at your request.
Object to Processing	A right to object to our processing of Personal Data held by us about you (including for the purposes of sending marketing materials to you).

International Data Transfers

Permissio is located in the United States, as such, your Personal Data may be processed by us or our service providers in the United States. In such case, we have endeavored to establish and provide appropriate safeguards for EEA residents, and provide EEA residents the ability to enforce their data subject rights and provide EEA residents effective legal remedies as set forth in GDPR Article 46.

For any transfer of Personal Data from the EEA, Switzerland, or the United Kingdom that we make, we use appropriate safeguards to ensure for the lawful processing and transfer of the Personal Data. When appropriate, we may use [standard contractual clauses](#) approved by the European Commission. Please contact us through one of the methods provided in the “Contact Us” section below and put “Safeguards” in the subject line to receive more information on the safeguards we have put in place.

Data Retention

We will retain your Personal Data for as long as necessary to fulfill the purposes for which we collect your Personal Data and for the purpose of satisfying any legal or reporting requirements that apply to us.

Make a Complaint

If you have any concerns or complaints regarding our processing of your Personal Data, please contact us through one of the methods provided in the “Contact Us” section below and put “Complaint” in the subject line.

If you have any concerns regarding our processing of your Personal Data or are not satisfied with our handling of any request by you in relation to your rights, you have the right to make a complaint to your local supervisory authority ([EU Data Protection Authorities](#), [Information Commissioner’s Office](#)).

Notice to California Residents

We do not disclose your Personal Data to any third party for such third party’s direct marketing purposes without you expressly consenting or opting-in to this disclosure prior to us providing such third party your personal data. You do not have to consent or opt-in to this disclosure to use our Services. Thus, under California Civil Code Sections 1798.80-1798.84, upon your request, we have no obligation to provide you further information. Provided, however, you can contact us through one of the methods provided in the “Contact Us” section below and put “California Opt-Out” in the subject line to withdraw your consent or opt-out of such disclosures.

Notice to Nevada Residents

Nevada law allows Nevada residents to opt out of the sale of certain types of Personal Data. Subject to several exceptions, Nevada law defines “sale” to mean the exchange of certain types of Personal Data for monetary consideration to a person for the person to license or sell the Personal Data to additional persons. We do not currently sell Personal Data as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt-out of sales and we will record your instructions and incorporate them in the future if our policy changes. Opt-out requests may be sent to us through one of the methods provided in the “Contact Us” section below and put “Nevada Opt-Out” in the subject line.

Notice to Utah Residents

We do not disclose your Personal Data to any third party for such third party’s direct marketing purposes without your consent or opt-in.

Notice to Canadian Residents

Your Personal Data may be used, processed and/or stored outside of Canada (in the United States or elsewhere) by us or a third-party service provider. Such personal information may be subject to disclosure in accordance with the laws applicable in the jurisdiction in which the information is process or stored, which laws may not provide the same level of protection for such information as will Canadian laws.

Children’s Privacy

In compliance with the Children’s Online Privacy Protection Act, 15 U.S.C., §§ 6501-06 and 16 C.F.R., §§ 312.1-312.12, this App does not collect information from children under thirteen (13) years of age, and we do not intentionally collect information from persons under thirteen (13) years of age. If you are a parent or guardian and you are aware that a child under thirteen (13) has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from a child under thirteen (13) without verification of parental consent, we will take steps to remove that information from our servers.

Changes to This Privacy Policy

We reserve the right to change, modify or otherwise update this policy at any time. Unless otherwise noted, any changes to this Privacy Policy will be effective immediately. If any changes are material, we may provide you notice of such changes by posting notice on the App or by other means.

Contact Us

If you have any questions about this Privacy Policy, please contact us through a method provided below.

By Email: [permissionsupport@\[redacted\].com](mailto:permissionsupport@[redacted].com)

By Mail: Permissio

Attn: Permissio Compliance

12730 28th Ave NE, Seattle, WA 98125