

Avanade Privacy Statement

This privacy statement is effective as of 01 January 2020.

Please note that this privacy statement will regularly be updated to reflect any changes in the way we handle your personal data or any changes in applicable laws.

If you are a California resident, please see our specific data privacy statement for California residents [here](#). If you are a California resident, you have specific privacy rights under California Consumer Privacy Act of 2018 ("CCPA"). You can *opt-out* [here](#) from any selling of your personal information.

This page and its sub-pages explain how Avanade Inc. and/or its [affiliates](#), subsidiaries and newly acquired companies ("Avanade"; "we") protect the personal data we process and control relating to you ("your personal data"; "your data") and which rights you have in relation to the processing of your personal data.

Any Avanade entity located outside the European Union will for the purposes of compliance with data privacy laws be represented by Avanade Inc.

In this privacy statement, we include specific information on the following:

- [How does Avanade protect your personal data?](#)
- [How do we use personal data when you visit Avanade's website?](#)
- [How do we use cookies \(and other tracking technologies\)?](#)
- [How do we use personal data when you visit our offices?](#)
- [How do we use personal data for marketing purposes?](#)

1. How does Avanade protect your personal data?

Avanade attaches great importance to your right to privacy and the protection of your personal data. We want you to feel secure that when you deal with Avanade, your personal data are in good hands.

Avanade protects your personal data in accordance with applicable laws and our data privacy policies. In addition, Avanade maintains the appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful processing and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage thereto.

The following sections provide additional information about how Avanade processes your personal data:

- [Which categories of personal data do we collect and how do we process such personal data?](#)
- [For which purposes and on which legal basis do we use your personal data?](#)
- [Will we share your personal data with third parties?](#)
- [What about sensitive data?](#)
- [What about data security?](#)
- [Where will your personal data be processed?](#)
- [How long will your personal data be retained by us?](#)
- [Which rights do you have with respect to the processing of your personal data?](#)

Which categories of personal data do we collect and how do we process such personal data?

We collect personal data of our employees, potential employees, clients, prospective clients, suppliers, business contacts, shareholders and website users. If the data we collect are not listed in this privacy statement, we will give individuals (when required by law) appropriate notice of which other data will be collected and how they will be used.

Specifically, the personal data we collect include the categories of personal data described in the sections “[2. How do we use personal data when you visit Avanade’s website?](#)”, “[3. How do we use cookies \(and other tracking technologies\)?](#)”, “[4. How do we use personal data when you visit our offices?](#)” and “[5. How do we use personal data for marketing purposes?](#)”, as well as any other categories of personal data referred to in this privacy statement or in other statements you have received.

Except for certain information that is required by law or by Avanade policies, your decision to provide any personal data to us is voluntary. You will therefore not be subject to adverse consequences if you do not wish to provide us with your personal data. However, please note that if you do not provide certain information, we may not be able to accomplish some or all of the purposes outlined in this privacy statement, and you may not be able to use certain tools and systems which require the use of such personal data.

If you provide us with personal data of another person (for instance, a potential employee/referral), you are responsible for ensuring that such person is made aware of the information contained in this privacy statement and that the person has given you his/her consent for sharing the information with Avanade.

The above-mentioned categories of personal data have been obtained either directly from you (for example, when you provide information to sign up for a newsletter or register to comment on a forum website) or indirectly from certain third parties (for example, through our website’s technology). Such third parties include our affiliates, public authorities, public websites and social media, suppliers and vendors.

For which purposes and on which legal basis do we use your personal data?

Avanade uses your personal data only where required for specific purposes. Please view the table below for (i) a list of the purposes for which Avanade uses your personal data and (ii) an overview of the legal basis for each such purpose.

Purpose	Legal basis
Managing our contractual and/or employment relationship with you.	Necessary for the performance of a contract to which you are a party.
Recruitment.	Justified on the basis of our legitimate interests for ensuring that we recruit the appropriate employees.
Facilitating communication with you (including in case of emergencies, and to provide you with requested information).	Justified on the basis of our legitimate interests for ensuring proper communication and emergency handling within the organization.

Operating and managing our business operations.	Justified on the basis of our legitimate interests for ensuring the proper functioning of our business operations.
Complying with legal requirements.	Necessary for the compliance with a legal obligation to which we are subject.
Monitoring your use of our systems (including monitoring the use of our website and any apps and tools you use).	Justified on the basis of our legitimate interests of avoiding non-compliance and protecting our reputation.
Social listening (Identifying and assessing what is being said about Avanade and our clients on publicly accessible social media content to understand sentiment, intent, mood and market trends and our stakeholders' needs and thereby improving our services. We do this through keyword searches and our goal is to gain insights in conversation trends over a specified period and not to identify an individual. To achieve this, we analyze and monitor conversation streams and monitor publicly available opinions, statements or other interactions on social media channels.)	Justified on the basis of our legitimate interest of protecting our assets and our brand on social media
Improving the security and functioning of our website, networks and information.	Justified on the basis of our legitimate interests for ensuring that you receive an excellent user experience and our networks and information are secure.
Undertaking data analytics, i.e. applying analytics to business operations and data to describe, predict and improve business performance within Avanade and/or to provide a better user experience. (more details on how we run analytics on our website can be found in our Cookies Policy).	Justified on the basis of our legitimate interests for ensuring the proper functioning of our business operations.
Marketing our products and services to you (unless you objected against such processing, as further described in the section " 5. How do we use personal data for marketing purposes? " below).	Justified on the basis of our legitimate interests for ensuring that we can conduct and increase our business.

Where the above table states that we rely on our legitimate interests for a given purpose, we are of the opinion that our legitimate interests are not overridden by your interests, rights or freedoms, given (i) the transparency we provide on the processing activity, (ii) our privacy by design approach, (iii) our regular

privacy reviews and (iv) the rights you have in relation to the processing activity. If you wish to obtain further information on this balancing test approach, please contact Avanade's Data Privacy Officer [mailto: at AvanadeDPO@avanade.com](mailto:AvanadeDPO@avanade.com).

We will process your personal data for the purposes mentioned above based on your prior consent, to the extent such consent is mandatory under applicable laws.

To the extent you are asked to click on/check "I accept", "I agree" or similar buttons / checkboxes / functionalities in relation to a privacy statement, doing so will be considered as providing your consent to process your personal data, only in the countries where such consent is required by mandatory law. In all other countries, such action will be considered as a mere acknowledgement and the legal basis of the processing of your personal data will not be your consent but any other applicable legal basis.

We will not use your personal data for purposes that are incompatible with the purposes of which you have been informed, unless it is required or authorized by law, or it is in your own vital interest (e.g. in case of a medical emergency) to do so.

Will we share your personal data with third parties?

We may transfer personal data to our service providers, professional advisors, public and governmental authorities, Accenture PLC and/or its [affiliates](#) or third parties in connection with Avanade's operation of its business, including any (potential) corporate or commercial transaction. Such third parties may be located in other countries. Before we do so, we shall take the necessary steps to ensure that your personal data will be given adequate protection as required by relevant data privacy laws and Avanade's internal policies.

Unless you are otherwise notified, any transfers of your personal data from within the European Economic Area (EEA) to third parties outside the EEA will be based on an adequacy decision or are governed by the standard contractual clauses (a copy of which can be obtained through the contact information included below) . Any other non-EEA related transfers of your personal data will take place in accordance with the appropriate international data transfer mechanisms and standards.

What about sensitive data?

We do not generally seek to collect sensitive data (also known as special categories) through this site or otherwise. In the limited cases where we do seek to collect such data, we will do this in accordance with data privacy law requirements and/or ask for your consent.

The term "sensitive data" refers to the various categories of personal data identified by data privacy laws as requiring special treatment, including in some circumstances the need to obtain explicit consent from you. These categories include racial or ethnic origin, political opinions, religious, philosophical or other similar beliefs, membership of a trade union, physical or mental health, biometric or genetic data, sexual life or orientation, or criminal convictions and offences (including information about suspected criminal activities).

What about data security?

We maintain organizational, physical and technical security arrangements for all the personal data we hold. We have protocols, controls and relevant policies, procedures and guidance to maintain these arrangements taking into account the risks associated with the categories of personal data and the processing we undertake.

We adopt market leading security measures to protect your personal data. This includes (without being limitative):

- Avanade's Information Security Program aligns with the ISO 27001 framework. We also hold an ISO 27001 certification for our Corporate Client Data Protection program and the CMS (Cloud Managed Services) business unit which indicates that we adhere to the highest and strictest information security standards. This certification is an international security standard that is awarded and confirms that Avanade's processes and security controls provide an effective framework for protecting our clients' and Avanade's information.
- We have a global Client Data Protection ("CDP") program in place which governs the stewardship of client information and systems entrusted to us.
- We have regular penetration testing performed by a third-party provider, which continues to show the strength of our technical defenses.

Where will your personal data be processed?

As a global organization with offices and operations globally, personal data we collect may be transferred or be accessible internationally throughout Avanade's global business and between Avanade's entities and/or its [affiliates](#), including Accenture PLC and/or its [affiliates](#).

Any such transfers throughout Avanade's global business take place in accordance with applicable data privacy laws (including the General Data Protection Regulation) and governed by the Avanade Intra-Group Data Protection Agreement (IGDPA) and the Intra-Group Data Processing and Transfer Agreement (IGDTA).

Having our Intra-Group Data Protection Agreement (IGDPA) and Intra-Group Data Processing and Transfer Agreement (IGDTA) means that all our group entities which have signed up to these Agreement have to comply with the same internal rules. It also means that your rights (see "[Which rights do you have with respect to the processing of your personal data?](#)") stay the same no matter where your data are processed by Avanade.

How long will your personal data be retained by us?

We will retain your personal data only for as long as is necessary. We maintain specific records management and retention policies and procedures, so that personal data are deleted after a reasonable time according to the following retention criteria:

- We retain your data as long as we have an ongoing relationship with you (in particular, if you have an account with us).
- We will only keep the data while your account is active or for as long as needed to provide services to you.

- We retain your data for as long as needed in order to comply with our global legal and contractual obligations.

Which rights do you have with respect to the processing of your personal data?

You are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

- Request access to the personal data we process about you: this right entitles you to know whether we hold personal data about you, and if we do, to obtain information and a copy of that personal data.
- Request a rectification of your personal data: this right entitles you to have your personal data be corrected if it is inaccurate or incomplete.
- Object to the processing of your personal data: this right entitles you to request that Avanade no longer processes your personal data.
- Request the erasure of your personal data: this right entitles you to request the erasure of your personal data, including where such personal data would no longer be necessary to achieve the purposes.
- Request the restriction of the processing of your personal data: this right entitles you to request that Avanade only processes your personal data in limited circumstances, including with your consent.
- Request portability of your personal data: this right entitles you to receive a copy (in a structured, commonly used and machine-readable format) of personal data that you have provided to Avanade, or request Avanade to transmit such personal data to another data controller.

To the extent that the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time by contacting [Avanade's Data Privacy Officer](#). Please note that this will not affect Avanade's right to process personal data obtained prior to the withdrawal of your consent, or its right to continue parts of the processing based on other legal bases than your consent.

If, despite our commitment and efforts to protect your personal data, you believe that your data privacy rights have been violated, we encourage and welcome individuals to come to Avanade first to seek resolution of any complaint. You have the right at all times to register a complaint directly with the relevant supervisory authority or to make a claim against Avanade with a competent court (either in the country where you live, the country where you work or the country where you deem that data privacy law has been infringed).

Please contact [Avanade's Data Privacy Officer](#) if you have any questions or concerns about how Avanade processes your personal data or if you want to exercise your rights in relation to your personal data.

2. How do we use personal data when you visit Avanade's website?

In addition to the information set out above, the following sections describe how we use personal data when you visit Avanade's website:

- [Which personal data do we gather?](#)
- [Do we include \(links to\) websites and programs of third parties?](#)
- [How do we use personal data that we collect from our websites?](#)

Which personal data do we gather?

Avanade collects personal data at its websites in two ways: (1) directly (for example, when you provide personal data to sign up for a newsletter or register to comment on a forum website); and (2) indirectly (for example, through our website's technology).

We may collect and process the following personal data:

- Personal data that you provide by filling in forms on our website. This includes registering to use the website, subscribing to services, newsletters and alerts, registering for a conference or requesting a white paper or further information. Pages that collect this type of personal data may provide further information as to why your personal data are needed and how it will be used. It is completely up to you whether you want to provide it.
- If you contact us, we may keep a record of that correspondence.
- We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Any postings, comments or other content that you upload or post to an Avanade website.
- Our website collects personal data about your computer, including (where available) your IP address, operating system and browser type, for system administration, to filter traffic, to look up user domains and to report on statistics.
- Details of your visits to our website, the pages you view and resources you access or download, including but not limited to, traffic data, location data, weblogs and other communication data. Please see section "[3. How do we use cookies \(and other tracking technologies\)?](#)" below for more information.

Do we include (links to) websites and programs of third parties?

Our websites may include:

- Links to and from the sites of our partner networks, advertisers and affiliates.
- Certain programs (widgets and apps) of third parties. Where this is the case, note that such third parties may process your personal data collected through such programs for their own purposes.

We do not accept any responsibility or liability for such third parties' sites or programs. Please check such third parties' terms of use and privacy statements before using and providing any information to such third parties' sites and programs.

How do we use personal data that we collect from our websites?

We use personal data for the purposes described in the section "For which purposes and on which legal basis do we use your personal data?" above, as well as to provide you with information you request, process online job applications, and for other purposes which we would describe to you at the point where it is collected. For example:

- Links to and from the sites of our partner networks, advertisers and affiliates.
- Certain programs (widgets and apps) of third parties. Where this is the case, note that such third parties may process your personal data collected through such programs for their own purposes.

We analyze your IP and browser information to determine what is most effective about our website, to help us identify ways to improve it and make it more effective. Please see the section “[3. How do we use cookies \(and other tracking technologies\)?](#)” below for more information.

If you have any questions about website permissions, please contact us using our [Contact Us](#) form.

3. How do we use cookies (and other tracking technologies)?

In addition to the information set out above, this section describes how we use cookies and other tracking technologies.

We analyze your IP and browser information to determine what is most effective about our website, to help us identify ways to improve it and, eventually, to determine how we can tailor our website to make it a more positive and relevant user experience.

Please see our [Cookies Policy](#) for more details. By using our website, you agree that we can place cookies and other similar technologies on your device as explained in our [Cookies Policy](#).

4. How do we use personal data when you visit our offices?

In addition to the information set out above, this section describes how we use personal data when you visit Avanade offices.

Please click [here](#) to receive further details on how we process your personal data when visiting our offices (this sub-page also relates to the potential processing of your personal data through CCTV and access management systems in case such CCTV and access management systems are active.)

If you have any questions on data privacy or you want to let us know about website/marketing permissions, please [Contact Us](#).

5. How do we use personal data for marketing purposes?

In addition to the information set out above, the following sections describe how we use personal data for marketing purposes:

- [What are the sources of marketing data?](#)
- [Do we send targeted e-mails?](#)
- [Do we maintain Customer Relationship Management \(CRM\) databases?](#)
- [Do we combine and analyze personal data?](#)
- [Do we share personal data with third parties?](#)
- [What are your rights regarding marketing communications?](#)

What are the sources of marketing data?

The bulk of the personal data we collect and use for marketing purposes relates to individual employees of our clients and other companies with which we have an existing business relationship. We may also obtain contact information from public sources, including content made public at social media websites, to make an initial contact with a relevant individual at a client or other company.

Do we send targeted e-mails?

We send commercial e-mail to individuals at our client or other companies with whom we want to develop or maintain a business relationship in accordance with applicable marketing laws. Our targeted e-mail messages typically include web beacons, cookies, and similar technologies that allow us to know whether you open, read, or delete the message, and links you may click. When you click a link in a marketing e-mail you receive from Avanade, we will also use a cookie to log what pages you view and what content you download from our websites, even if you are not registered at or signed into our site.

Targeted e-mails from Avanade may include additional data privacy information, as required by applicable laws.

Do we maintain Customer Relationship Management (CRM) databases?

Like most companies, Avanade uses customer relationship management (CRM) database technology to manage and track our marketing efforts. Our CRM databases include personal data belonging to individuals at our client and other companies with whom we already have a business relationship or want to develop one. The personal data used for these purposes includes relevant business information, such as: contact data, publicly available information (e.g. board membership, published articles, press releases, your public posts on social media sites if relevant for business purpose), your responses to targeted e-mail (including web activity following links from our e-mails), website activity of registered users of our website, and other business information included by Avanade professionals based on their personal interactions with you. If you wish to be excluded from our CRM databases, please use this [link](#).

Do we combine and analyze personal data?

We may combine data from publicly available sources, and from our different e-mail, website, and personal interactions with you (this includes information collected across our different websites such as our careers and corporate sites and information collected when you sign-up or log on to our sites or connect to our sites using your social media credentials (such as LinkedIn and Xing). We combine this data to better assess your experience with Avanade and to perform the other activities described throughout our privacy policy.

Do we share personal data with third parties?

In addition to the third parties mentioned in the section "[Will we share your personal data with third parties?](#)" above, we may share your personal data with marketing agencies.

What are your rights regarding marketing communications?

You can exercise your right to prevent marketing communications to you by checking certain boxes on the forms we use to collect your personal data, or by utilizing opt-out mechanisms in e-mails we send to you. You can also exercise the right to discontinue marketing communications to you, or to have your personal data removed from our customer relationship management (CRM) databases at any time by using this [link](#). In such cases, we will retain minimum personal data to note that you opted out in order to avoid contacting you again.

If you have any questions on marketing permissions, please contact us using our [Contact Us](#) form.

6. How else might we use your personal data

In addition to the information set out above, the following sections describe other specific uses of personal data by some Avanade affiliates.

Below, we provide you with further details about how we process your personal data in connection with any content creation / production purposes.

Content creation / production activities

Some Avanade entities are in the business of content production. We may process your personal data for these TV, film, marketing, advertising or other related content creation, production and distribution activities.

What personal data do we process in connection with production activities?

- The personal data that we process for production purposes include images and footage of you and may include your location at the time of filming.
- If you are a member of public, we will diligently attempt to make you aware of our location and filming activities in advance and will give you an opportunity not to enter the location where filming is taking place and participate in them.
- If you are a focus of our filming activities (i.e. a contributor or talent such as an interviewee, extra or actor, as opposed to a member of public) we will also collect and process your name, contact information and any other information provided in any pre-filming questionnaires and/or release forms, such as next of kin details.
- We may also collect and process special categories of data such as health or disability information to the extent that this is necessary to enable us to make any necessary adjustments to our filming arrangements to assist or support you.

If you have any questions on any aspects of our production activities, please contact us by using our [Contact Us](#) form.

7. Contact us

Please click [here](#) if:

- You have a general question about how Avanade protects your personal data.
- You wish to exercise your rights in relation to your personal data rights (as set out in the sections "[Which rights do you have with respect to the processing of your personal data?](#)" and "[What are your rights regarding marketing communications?](#)"). Alternatively, you may want to use [this link](#) to exercise these rights.
- You wish to make a complaint about Avanade's use of your data.

You can also contact Avanade as data controller of your personal data via our [Data Privacy Officer](#) (preferably electronically) or via post, clearly marked for the attention of the Data Privacy Officer, at this address: 1191 Second Avenue, Suite 100, Seattle, WA 98101.