



Data Privacy Framework Policy

1. Scope

QlikTech Inc. and its U.S. operating affiliates, namely Talend, Inc. and Talend USA, Inc., (collectively, “Qlik”) comply with (i) the EU-U.S. Data Privacy Framework (“EU-U.S. DPF”), (ii) the UK Extension to the EU-U.S. DPF, and (iii) the Swiss-U.S. Data Privacy Framework (“Swiss-U.S. DPF”) as set forth by the U.S. Department of Commerce (collectively, the “DPF”). Qlik has certified to the U.S. Department of Commerce that it adheres to (i) the EU-U.S. Data Privacy Framework Principles with regard to the processing of Personal Data received from the European Union in reliance on the EU-U.S. DPF, (ii) the UK Extension to the EU-U.S. DPF with regard to the processing of Personal Data received from the United Kingdom (and Gibraltar) in reliance on the UK Extension, and (iii) the Swiss-U.S. Data Privacy Framework Principles with regard to the processing of Personal Data received from Switzerland in reliance on the Swiss-U.S. DPF (collectively, the “DPF Principles”). Transfers to Qlik of Swiss and/or UK Personal Data shall however continue to be under Qlik’s relevant EU/UK Standard Contractual Clauses until such a time as the relevant Swiss and UK authorities adopt adequacy decisions regarding those DPFs.

This Data Privacy Framework Policy (the “Policy”) applies to all EU/EEA/Swiss/UK Personal Data received by Qlik under the DPFs. “Personal Data” as used within this policy means personal data relating to an identifiable individual received by Qlik under the principles from the EU/EEA/ Switzerland/UK.

If there is any conflict between the terms in this Policy and the DPF Principles, the DPF Principles shall govern. To learn more about the Data Privacy Framework program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

2. Personal Data Processing by Qlik

Qlik commits to treat all Personal Data received in reliance on the relevant DPF in accordance with the DPF Principles. Information about our processing of Personal Data can be found in the appropriate Privacy Notice:

- [Privacy and Cookie Notice](#)
- [Product Privacy Notice](#)
- [Recruitment Privacy Notice](#)
- Employee and Contractor Privacy Notice (available internally to team members)

Relevant Talend privacy notices may be found [here](#).

The processing by Qlik of customer Personal Data for which it is a data processor is governed by our [Data Processing Addendum](#). Customers control their Personal Data content; for example, customers regulate access to their Qlik SaaS solutions as well as what Personal Data (if any, and its origin) they upload to our SaaS solutions. Qlik’s SaaS offerings are encrypted, no-view services, with no access or knowledge by Qlik as to what Personal Data content (if any) customers may choose to upload. Qlik only hosts these in the region the customer selects; unless the customer transfers it themselves such as by way of allowing



access to someone in a different region, e.g., U.S., their content is not transferred outside of their region. For further information, see our [Trust & Privacy](#) page.

3. Qlik's Compliance with the DPF Principles

Access

To the extent required by the DPF Principles, Qlik will provide certain rights over Personal Data, including rights of access, correction, amendment, and deletion, subject to certain exceptions.

Choice

To the extent required by the DPF Principles, Qlik will offer individuals the opportunity to choose (opt out) when their Personal Data is (a) to be disclosed to certain third parties, or (b) to be used for a purpose that is materially different from the purpose for which it was originally collected or subsequently authorized by the individual.

“Sensitive Information” as used within this Policy means Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the individual. To the extent required by the DPF Principles, when processing Sensitive Information, Qlik will offer individuals the opportunity to give affirmative express (opt in) choice, subject to certain exceptions, if the Sensitive Information is to be disclosed to a third party or used for a purpose other than those for which it was originally collected or subsequently authorized by the individual through the exercise of the opt in choice.

Exercising Rights

To exercise any of the above rights, please contact Qlik at privacy@qlik.com or complete a [Privacy Request](#). Subscribers to Qlik's marketing materials may at any time unsubscribe by using Qlik's website <http://www.qlik.com/opt-out> or by contacting Qlik directly.

Security

Qlik is committed to safeguarding Personal Data that it receives. Qlik takes reasonable and appropriate measures to protect Personal Data in Qlik's possession from loss, misuse, unauthorized access, disclosure, alteration and destruction. Further information regarding our security measures may be found on our [Trust & Security](#) page.

Onward Transfer

Qlik has responsibility for the processing of Personal Data subject to the DPFs which is subsequently transferred to a third party. Qlik may disclose Personal Data to subcontractors and third-party agents who assist Qlik in providing certain services. Before disclosing Personal Data to a subcontractor or third-party agent, Qlik will obtain assurances from the recipient that it will: (a) use the Personal Data only to assist Qlik in providing the services; (b) provide at least the same level of protection for Personal Data as required by the DPF Principles; and (c) notify Qlik if the recipient is no longer able to provide the required



protections. Qlik shall remain liable under the DPF Principles if a third-party processes such Personal Data in a manner inconsistent with the DPF Principles.

Qlik may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Dispute Resolution, Enforcement

In compliance with the DPF, Qlik commits to resolve DPF Principles-related complaints about our collection and use of your Personal Data. EU, EEA, Swiss, and UK individuals with inquiries or complaints regarding our handling of Personal Data received in reliance on the DPF should first contact Qlik at:

- **Human Resources Data:** Your local Qlik Culture and Talent representative.
- **External Personal Data:** privacy@qlik.com, or Office of the General Counsel, 211 South Gulph Road, Suite 500, King of Prussia, PA 19406 United States; phone: +1 (888) 828-9768; fax: +1 (610) 975-5987.

In the event we are unable to address your complaint or inquiry, in compliance with the DPF, Qlik commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities, the UK Information Commissioner's Office and the Gibraltar Regulatory Authority, and the Swiss Federal Data Protection and Information Commissioner with regard to unresolved complaints concerning our handling of personal data received in reliance on the DPF.

Under certain conditions, individuals have the option to invoke binding arbitration regarding a potential violation of Qlik's obligations under the DPF Principles. For additional information about the arbitration process, please visit the Data Privacy Framework website: www.dataprivacyframework.gov.

The Federal Trade Commission has jurisdiction over Qlik's compliance with the DPF.

4. Modifications to this Policy

This Policy may be amended from time to time, such as to meet future requirements of the DPF Principles, and the revised Policy will be posted at this location.

Last updated: January 17th, 2024