

# Altair Applicant Privacy Notice

Last Updated: November 20, 2024

## 1. Introduction

This Privacy Notice describes how Altair Engineering Inc., its subsidiaries, and affiliates (“Altair”, “we”, “our”, “us”) collects and uses your personal data when you apply for a job, express interest in employment, attend a recruitment event, or participate in an interview or assessment (“you” or “applicant”). If you disagree with the terms of this Privacy Notice, then please do not provide us with your information. Please note, however, that limiting the information you provide may hinder your progress in the application process.

If you are offered and you accept a role at Altair, your personal data collected during the recruiting process will become part of your employee file and will be governed by the Altair Employee Privacy Notice, a copy of which will be provided when you are on-boarded as an employee.

If you have any questions or concerns about our use of your personal data, then please contact us using the contact details provided at the bottom of this Privacy Notice.

## 2. Changes and updates to this Privacy Notice

This Privacy Notice may be updated from time to time to reflect any changes in the law, technology, or how we operate our business. We will take the appropriate measures to inform you of any updates to this Privacy Notice consistent with the significance of the changes we make. We will obtain our consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

## 3. Information We Collect About You and How We Collect It

We collect different types of information about you, including information that may directly identify you, information that is about you but individually does not personally identify you, and information that we combine with our other users. This includes information that we collect directly from you or through automated collection technologies.

Below is an overview of the broad categories of personal data collected by Altair:

<b>Broad Categories Collected</b>	<b>Examples</b>
Identifiers	Name, gender, date of birth
Demographic Data	Race, ethnic origin, marital status, sexual orientation, disability, and veteran or military status
Contact Information	Home address, telephone numbers, email addresses, and emergency contact information
National Identifiers	SSN, passport and visa information, and immigration status and documentation
Educational and Professional Background	Work history, academic and professional qualifications, educational records, references, and interview notes

Profile and Inferences Drawn from Other Personal Data	Summary about an applicant or employee's preferences, characteristics, attitudes, intelligence, abilities, aptitudes, and information gathered from references, recruiting agencies, and referrals
Application Profile	Application submission date and time, position applied for, application status and updates, application registration credentials

We obtain personal data through fair and lawful means. In many cases, we obtain your personal data directly from you or our interactions with you, such as when you complete an application or enter information about yourself into our systems. In other cases, we infer personal data through your interactions with us, such as through your use of the company's equipment, systems, and networks. Finally, some of the personal data we obtain may come from third-party sources, such as LinkedIn profile, recruitment agencies, headhunters, and referrals. This data may be combined with information we collect directly from you. We use this information to update your application profile.

#### 4. Sensitive Personal Data

We may collect sensitive personal data during the application process. However, this data is solely used for evaluating your candidacy. We do not sell or share sensitive personal data for any commercial purposes, including online advertising.

#### 5. Disclosure of Your Personal Data

We may disclose your personal data to the following categories of recipients:

- **Subsidiaries and Affiliates:** We may share data with affiliate and subsidiary companies within the Altair group.
- **Third-Party Service Providers:** We may share data with contractors, service providers, and other third parties who support our recruitment operations, all bound by contractual obligations to keep your data confidential and use it only for authorized purposes. These include data processing services and IT infrastructure providers.
- **Legal Requirements:** We may disclose data to law enforcement, regulators, or other legal entities if required by law, to protect our rights, or to safeguard your or someone else's safety.
- **Business Transfers:** In the event of a merger, divestiture, or sale of assets, your data may be transferred to the acquiring entity.
- **With Your Consent:** We may disclose your information to any other person or entity only with your consent.

A. Third-party recipients of disclosure for a business purpose (in the last 12 months):

Broad Categories Collected	Recipients of Disclosure
Identifiers	<ul style="list-style-type: none"> <li>• Subsidiaries and Affiliates</li> <li>• Third-Party Service Providers</li> </ul>
Demographic Data	<ul style="list-style-type: none"> <li>• Subsidiaries and Affiliates</li> <li>• Third-Party Service Providers</li> </ul>

Contact Information	<ul style="list-style-type: none"> <li>• Subsidiaries and Affiliates</li> <li>• Third-Party Service Providers</li> </ul>
National Identifiers	<ul style="list-style-type: none"> <li>• Subsidiaries and Affiliates</li> <li>• Third-Party Service Providers</li> </ul>
Educational and Professional Background	<ul style="list-style-type: none"> <li>• Subsidiaries and Affiliates</li> <li>• Third-Party Service Providers</li> </ul>
Profile and Inferences Drawn from Other Personal Data	<ul style="list-style-type: none"> <li>• Subsidiaries and Affiliates</li> <li>• Third-Party Service Providers</li> </ul>
Application Profile	<ul style="list-style-type: none"> <li>• Subsidiaries and Affiliates</li> <li>• Third-Party Service Providers</li> </ul>

B. Third-party recipients of disclosure for a commercial purpose (including online advertising in the past 12 months):

<b>Broad Categories Collected</b>	<b>Recipients of Disclosure</b>
Identifiers	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Demographic Data	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Contact Information	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
National Identifiers	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Educational and Professional Background	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Profile and Inferences Drawn from Other Personal Data	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Application Profile	<ul style="list-style-type: none"> <li>• N/A</li> </ul>

Altair has no actual knowledge that it sells or shares personal data of individuals under 16 years of age.

**6. Lawful Basis for Processing Your Personal Data**

Our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the specific context in which we collect it.

This means we collect and use your information only where:

- We need it for recruitment purposes, provide accommodations during the recruitment process, for the purpose of equal opportunities monitoring, compliance with anti-discrimination laws, or government reporting obligations, to determine your qualifications for employment, and to make hiring decisions;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as to inform you about Altair recruitment events in which you choose to participate, to fulfill a referral request when you are referred to a role by an Altair employee, to improve our recruitment process, to protect the safety, security, and integrity of our property (such as our databases and other technology assets), to protect the rights of those who interact with us or others, to detect, prevent, and respond to security incidents or other malicious, deceptive, fraudulent, or illegal activity, and to protect our legal rights and interests;

- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your company) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer participating in our recruitment or application process.

## **7. Security of Your Personal Data**

We use robust technical and organizational measures to protect your personal data. These measures are designed to provide a high level of security. While we implement strong safeguards, no system is completely impenetrable. We cannot guarantee absolute safety during internet transmission or storage.

## **8. International Data Transfers**

Your personal data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different than the laws of your country.

However, we have implemented safeguards to ensure your data remains protected, including complying with the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework (collectively, "DPF Program").

Altair complies with the EU-U.S. Data Privacy Framework ("EU-U.S. DPF"), the UK Extension to the EU-U.S. DPF (the "UK Extension"), and the Swiss-U.S. Data Privacy Framework ("Swiss-U.S. DPF") as set forth by the U.S. Department of Commerce. Altair has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles ("EU-U.S. DPF Principles") regarding the processing of personal data received from the EU in reliance on the EU-U.S. DPF and from the UK (and Gibraltar) in reliance on the UK Extension. Altair has also certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles ("Swiss-U.S. DPF Principles") regarding the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Notice and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles (collectively, the "DPF Principles"), the DPF Principles shall govern.

In compliance with the DPF Principles, Altair commits to resolve complaints about our collection or use of your personal data. EU, Swiss, and UK individuals with inquiries or complaints regarding this Notice should first contact Altair's Data Protection Officer at [privacy@altair.com](mailto:privacy@altair.com).

Under specific conditions, you may have the option to invoke binding arbitration for complaints regarding our DPF Program compliance not resolved by any of the other DPF Program mechanisms. Please view the following for additional information on this process and the applicable requirements: <https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction>.

Altair commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities ("DPA"s), the UK Information Commissioner's Office ("ICO"), the Gibraltar Regulatory Authority ("GRA"), and the Swiss Federal Data Protection and Information Commissioner ("FDPIC") in compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF, the UK Extension, and the Swiss-U.S. DPF in the context of the employment relationship.

The Federal Trade Commission ("FTC") has jurisdiction over Altair's compliance with the DPF Program.

The specific US-based entities covered by the DPF Program include: Altair Engineering Inc. and its U.S. subsidiaries Altair Product Design, Inc., Datawatch Corporation, solidThinking, Inc., and illumisys, Inc.

Altair has certified that it adheres to the DPF Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the DPF Program, and to view Altair's certification, please visit <https://www.dataprivacyframework.gov>.

In addition to adhering to the DPF Program, Altair has implemented applicable standard contractual clauses for transfers of personal data.

## 9. Data Retention

We will store your personal data in compliance with applicable laws and for as long as necessary to fulfill the purposes outlined in this Notice or as required by law.

If you're hired, your personal data will be managed according to our Employee Privacy Notice. If you're not selected, we'll keep your data for the duration of the application process, plus a reasonable time afterward. This allows us to document the reasons for our decision and address any potential legal claims.

With your consent, we may also retain your information for a reasonable period to consider you for future job opportunities at Altair.

## 10. Your Data Protection Rights

You have the following data protection rights:

- **Access, Correct, Update, or Delete:** You have the right to access, correct, update, or delete your personal data and can do so at any time by contacting us using the contact details provided under the "Contact Us" section of this notice.
- **Object to Processing, Restrict Processing, or Request Portability:** You have the right to object to processing, restrict processing, or request portability of your personal data and may exercise these rights by contacting us using the contact details provided under the "Contact Us" section of this notice.
- **Opt-Out of Marketing Communications:** You have the right to opt-out of marketing communications at any time. You can exercise this right by clicking the "unsubscribe" link in

the marketing emails we send you or by managing your subscription preferences at <https://altair.com/email-newsletter> or visit <https://web.altair.com/hs/manage-preferences/unsubscribe-simple>.

- **Withdraw Your Consent:** If we process your personal data with your consent, then you may withdraw your consent at any time. Please note that withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- **Opt-Out of Sale of Personal Data, Including Sharing Personal Data for Online Advertising:** You have the right to opt out of the sale of your personal data, including sharing personal data for online advertising. Personal data collected for employment is not used for online advertising.
- **Sensitive Personal Data:** We do not use or disclose your sensitive personal data, except for the purpose of evaluating your candidacy. We do not sell or share sensitive personal data for any commercial purposes, including online advertising.
- **Right to Non-Discrimination:** We may not discriminate against you for exercising a privacy right outlined in this notice.
- **Right for an Authorized Agent:** You have the right to have your authorized agent make a data privacy request on your behalf. For more information, please contact us using the contact details provided under the "Contact Us" heading at the bottom of this notice.
- **Right to Appeal:** If you are not satisfied with our response regarding your data privacy request, you have the right to appeal our decision. For more information, please contact us using the contact details provided under the "Contact Us" heading at the bottom of this notice. If you are not satisfied with the result of the appeal, you have the right to contact your respective attorney general depending on where you reside.
- **Right to Complain to a Data Protection Authority:** You have the right to complain to a data protection authority about our collection and use of your personal data depending on where you reside. For more information, please contact your local data protection authority.

We respond to all data protection requests from individuals in accordance with applicable data protection laws. To verify requests, we compare the personal data provided by the requestor with our existing records. We may use multiple data points for verification. During the verification process, Altair is committed to avoid collecting additional personal data to fulfill an individual's request.

## 11. Contact Us

Your personal data is controlled by Altair Engineering Inc. If you have any questions or concerns about our use of your personal data, please contact us at [privacy@altair.com](mailto:privacy@altair.com) (we operate online), or at the following address:

Altair Engineering Inc., ATTN: Data Protection Officer  
1820 E. Big Beaver Road Troy, MI 48083 USA  
Phone: 248-614-2400, Ext. 453  
Email: [privacy@altair.com](mailto:privacy@altair.com)

