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POLICY

Global Data Security and Privacy at Articulate

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Articulate Global, LLC, is a U.S.-based software as a service (SaaS) company that offers industry-leading e-learning creation and distribution products, Articulate 360 and Reach 360. Articulate 360 simplifies course creation from start to finish with two award-winning authoring applications, 10+ million course assets and templates, an easy-to-use project review application, and on-demand training with industry experts. Reach 360 is a lightweight distribution tool that integrates with Articulate 360 to quickly deliver training to hard-to-reach learners who may not be attached to your learning management system (LMS). Articulate products harness the latest training technologies and are continually updated to ensure excellence, empowering your organization to create, distribute, and manage engaging e-learning that drives meaningful business outcomes.

You may have questions about how we keep your data safe across our products. At Articulate, we understand the importance of protecting our customers' data—no matter where in the world you're located. That's why we have implemented comprehensive technical and organizational security measures to ensure our systems and services' confidentiality, integrity, and availability.

This customer assurance all begins with our adherence to key regulatory frameworks:

Compliance

Articulate is committed to complying with the highest standards for data security and privacy practices. Articulate has obtained certifications from global industry leaders such as the American Institute of Certified Public (AICPA), the International Organization for Standardization (ISO), and the Cloud Security Alliance (CSA) Security Trust Assurance and Risk (STAR) program to maintain high data security and privacy standards.

Here is a list of the current global-based certification that we hold:

- ISO 27001 (Information Security)
- ISO 27701 (Data Privacy)

- AICPA's SOC2 Type 2 (Trust Service Principles: Security, Availability, and Confidentiality)
- Cloud Security Alliance's CSA Star Level 1

As we await the new EU-U.S. Privacy Shield 2.0 legislation, Articulate has taken measures to align with the General Data Protection Regulation (GDPR) by utilizing EU-approved Standard Contractual Clauses for all EU-based customers. We've also aligned with other global privacy laws, including those in the United Kingdom, South Korea, Australia, and Brazil. For more information about our data privacy practices, please visit: Articulate Trust Center - View Our Company Privacy Policy.

Hosting and Disaster Recovery

Articulate uses Amazon Web Services (AWS) as its hosting provider. Articulate 360 services are redundant across five physically isolated and resource-independent availability zones. This redundancy ensures that up to two data centers can go offline simultaneously while we continue to provide customers with a great experience. You can learn more about our services' uptime by visiting: https://www.articulatestatus.com.

Articulate's infrastructure exists as a virtual environment and is entirely scalable. Capacity monitoring is performed to ensure that the utilization of resources (including available storage) stays within acceptable limits. We also have the ability with Amazon Web Services (AWS) to accommodate any additional capacity needs quickly.

Our security team performs frequent, fully automated customer data backups and has implemented upto-the-minute recovery options where feasible. We test our data recovery nightly with full automation and monitoring to alert us if there are any problems, either producing the backups or restoring them to a test location. This practice reduces the likelihood of data loss and minimizes downtime in a large-scale disaster.

Encryption and Data Protection

Articulate leverages Amazon Web Services' (AWS) Key Management Service (KMS) to manage the life cycle of keys within our AWS environment. KMS is natively supported by AWS services and backed by hardware security modules (HSMs).

Access to the KMS management console is restricted to only approved Articulate personnel with role-based business needs.

Articulate uses the latest encryption technology to secure all customer data. Articulate supports customer data encryption Transport Layer Security protocols 1.2 and 1.3 encryption methods for data in transit. Data at rest on our servers is encrypted using industry standards (e.g., AES 256).

Data Management

Articulate engineers have limited access to customer content to troubleshoot production outages. A small subset of our engineering team has full access to production infrastructure with safeguards in place, including two-factor authentication and short-leased, revocable sessions.

Our engineers use individual user accounts, each with a two-factor authentication requirement. A secure channel (VPN) and username/password authentication are required for all remote access to Articulate information and systems. All access to our AWS infrastructure is logged for auditing purposes.

These practices are annually audited as part of our SOC 2 Type 2 Audit.

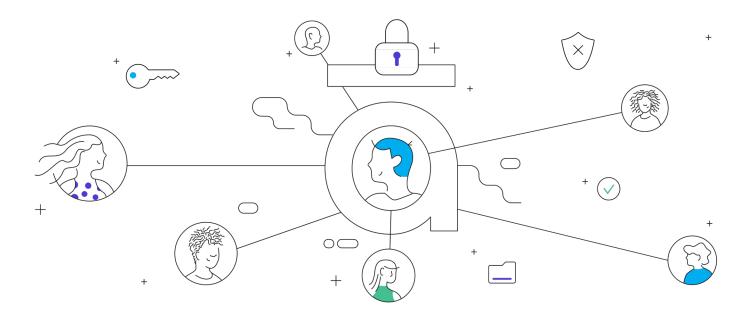
Data Privacy / GDPR

At Articulate, we value our worldwide customer base and your right to privacy.

Under the GDPR, we are generally considered a data processor for the data we collect as we deliver e-learning services to our customers, the data controller. We engage carefully vetted sub-processors for specific purposes to provide e-learning services.

We require that each sub-processor sign and adhere to a Data Processing Agreement (DPA), which reflects our commitment, and that of our sub-processors, to take obligations with regard to data privacy seriously.

Providing you with control over Articulate's collection, retention, and usage of your data is a vital component of the GDPR. For more information about how we align with the GDPR and provide you with control over Articulate's collection, retention, and usage of your data, please visit: Articulate Trust Center - Learn How We Comply with GDPR.



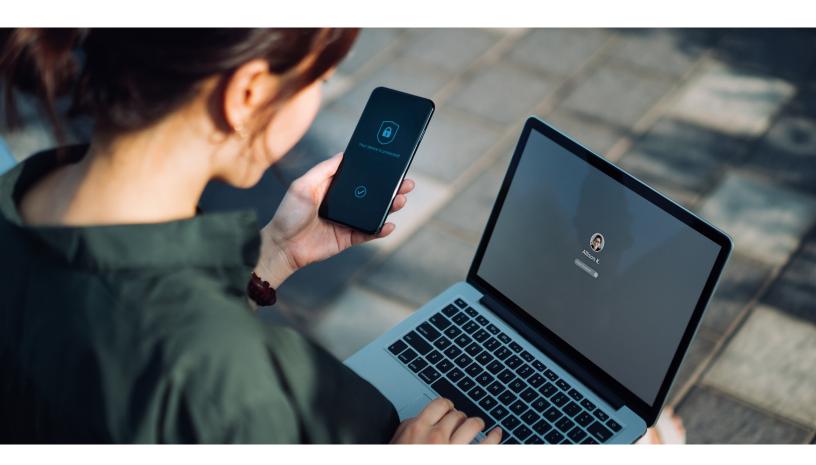
Hiring and Training Practices

Articulate hires top engineers with a proven track record in the industry to maintain our infrastructure. In addition, we provide ongoing internal and external training opportunities. Security engineers are provided content and trained on security-specific processes and knowledge relevant to our security program.



We take data security and privacy very seriously. Our commitment to maintaining the highest standards for data protection ensures that our customers' data is always protected.

If you have any questions regarding our data security and privacy practices, please contact us for more information at security@articulate.com.



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