

DASSAULT SYSTEMES GROUP

HUMAN RESOURCES DATA PRIVACY POLICY

The following provisions make up Dassault Systèmes Group HR Data Privacy Policy (the "Policy"). This Policy applies to our employees, applicants and independent contractors.

Introduction

Dassault Systèmes and its subsidiaries around the world (collectively, "DS") understand the personal nature of the information provided by employees, applicants and independent contractors. DS is committed to protecting the privacy of the information collected, including through the DS online employment application process.

This Policy applies to personally identifiable information and other personal data (referred to herein as "Personal Data") provided to DS by employees during the course of employment, applicants through the application process and independent contractors through their provision of services. The purposes of this Policy are: (i) to establish measures in an effort to protect Personal Data, (ii) to inform our employees, applicants and independent contractors of the types of Personal Data gathered, and how the Personal Data is used and secured, and the mechanisms that are available to correct Personal Data.

DS abides by the European Data Protection Directive, as well as applicable local legislation and regulations. With respect to Personal Data transferred from the European Union to the United States or other non-European locations, please note that DS subsidiaries who have received Personal Data relating to employees, applicants or independent contractors in the European Community have either: (i) checked that they were subject to another European Commission adequacy finding; (ii) self-certified that their privacy practices applicable to human resources administration adhere to the United States Safe Harbor Principles; or (iii) signed a contract with DS which contains model contractual provisions issued by the European Commission.

For information on the U.S. Department of Commerce Safe Harbor Program, please visit <http://www.export.gov/safeharbor/>.

This Policy may, in some cases, be overridden by local policies of DS concerning internal monitoring by DS of email, Internet, voicemail, cell phones, personal digital assistants and other electronic communication media provided by DS for the use of its employees and contractors.

Use of Personal Data We Collect

In the course of our business, we gather Personal Data concerning employees, applicants and independent contractors for the following purposes:

- Determining, evaluating, and implementing employment-related actions and obligations to include required government reporting, and employment & background checks & investigations;
- Designing, evaluating, and administering compensation, benefits, stock-options and related management, as well as other human resources programs;
- Designing, evaluating, and implementing employment-related education and training programs;
- Monitoring and evaluating employee and independent contractor conduct and performance;
- Monitoring and managing (i) DS's collaborative web tools, mailboxes, and instant messaging solution, as well as other DS information systems and (ii) in general, all forms of electronic and digital media and services for employees' and independent contractors' use (to include but not be limited to computers, company issued cell phones and other devices or services, servers, software and utilities, business applications, networks and security) including users' requests
- For online applicants, creating a personal profile and access codes, validating identity during the online process, and evaluating applicants for positions with DS;
- Monitoring and managing the relationships between DS and its business partners & stakeholders (e.g. its suppliers, resellers, customers, potential customers), which includes, but is not limited to, the monitoring and management of (i) marketing activities (e.g., contacts, customer lists, system access rights, etc.), (ii) sales (sales opportunities, commercial offers, orders, contracts, invoices, etc.), (iii) purchases (offers, orders, contracts, invoices, etc.), (iv) customers support services and (v) Research & Development activities (e.g. development requests, incidents, quality, tests, manufacturing, etc.); and
- Monitoring and managing employees' or independent contractors' professional travels and business expenses (including their reimbursements).

Type of Data Collected

DS requires that employees, applicants and independent contractors provide certain Personal Data during the course of employment, the application process or the provision of services. This Personal Data likely includes: name, address, social security identification number, educational background, employment history, areas of expertise, job type preferences, and any other similar information needed in connection with human resource administration. In all cases, however, the Personal Data gathered is limited to data necessary to conduct the business of DS.

How We Collect, Process and Store Personally Identifiable Data

When collecting Personal Data, we will inform the employee, applicant or independent contractor of the purpose for the collection when required by applicable laws and regulations. Personal Data is generally collected to carry out the business of DS, such as to process an employment application, process payroll, organize trainings, conduct recruitment, process on-going hiring, evaluations, turnover metrics and comply with reporting obligations required by law and similar activities.

Processing of Personal Data includes using, storing, recording, transferring, adapting, summarizing, amending, sharing and destroying Personal Data as necessary under the circumstances or as otherwise required by law. DS may require original documents containing Personal Data that verify employment eligibility and identification, which information may be processed in the same manner.

All Personal Data that has been collected will be stored for a limited duration that is relevant to the purpose of such collection and for so long as required by applicable law.

Disclosure and Transfer of Personal Data

As a global company, DS is able to leverage technology to efficiently manage employee Personal Data and obtain candidate applications online throughout its global operations. DS may provide access to Personal Data to DS personnel in other countries for the above purposes. This will involve the transfer of Personal Data in and outside the employees', applicants' and independent contractors' country. It might also be necessary to disclose Personal Data to suppliers, contractors or service agents providing services to DS in connection with the above mentioned uses. For example, subject to certain legal requirements, DS may use external service providers to collect, process and validate Personal Data, such as education, work history, compensation, background, references, and status. DS might also disclose Personal Data to satisfy the legitimate requirements of a third party which is considering acquiring some of DS's business operations.

Before sharing Personal Data concerning a European Union resident with a third party, DS will ascertain that the third party: (i) safeguards Personal Data consistent with this Policy; (ii) is subject to the European Union Privacy Directive; (iii) has certified compliance with the European Union and/or U.S. Safe Harbor Principles; or (iv) is subject to another European Commission adequacy finding. Where DS has knowledge that an agent is using or disclosing Personal Data contrary to this Policy or applicable law, DS will take reasonable steps to prevent or stop such use or disclosure.

DS will also disclose Personal Data to third parties if DS determines, in its discretion, that such disclosure is necessary to protect DS legal interests, such as in the following types of circumstances: (i) as a matter of law (e.g., to tax and social security authorities); (ii) to protect DS's legal rights (e.g., to defend or prosecute a lawsuit or administrative proceeding); or (iii) in an emergency where health or security of an employee, an applicant or an independent contractor may be endangered. These transfers may be

transmitted over the internet, via mail, via facsimile, or by any other method that DS determines is appropriate and in accordance with applicable law.

Access to Data

DS has in place reasonable safeguards, and enforces this Policy, to keep Personal Data secure, accurate, complete, and up to date, to the extent necessary for the purposes for which that Personal Data was collected.

Pursuant and subject to the European Directive 95/46/C on personal data and privacy protection, as well as national provisions adopted pursuant to this Directive and other local applicable laws, employees, applicants and independent contractors can access their Personal Data, subject to the principle of proportionality or reasonableness, by notifying the local Human Resources Department. Moreover, they have the ability to correct and update their Personal Data, by notifying the local Human Resources Department or by sending an email to DS.PrivacyPolicy@3ds.com. DS will use reasonable efforts to correct any reported factual inaccuracies in Personal Data. Depending on the scope of the request, DS reserves the right to charge a reasonable fee to cover any out-of-pocket costs (such as copying fees) incurred in connection with such access and correction.

Employees and independent contractors should notify their local Human Resources Department concerning changes in personnel data, such as legal change of name, address, dependents, change of beneficiaries under benefit plans, and other such status changes. As regards applicants, they should contact the local Human Resources Department for DS or send an email to DS.PrivacyPolicy@3ds.com.

We may deny access to Personal Data in limited situations as defined by applicable laws and regulations.

Data Security

All Personal Data will be treated as confidential. Therefore, DS restricts access to such Personal Data. Access to, and disclosure of, Personal Data are restricted to employees, independent contractors or agents who are engaged in DS business activities. Such access and disclosure will also be limited to business reasons consistent with the purpose for which it was collected. All non-business related access and/or disclosures are prohibited.

Every employee must contribute to the confidentiality of Personal Data by respecting technical access and clearance processes and procedures. DS maintains reasonable physical, electronic, and procedural safeguards to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction. As part of those precautions, we employ technologies designed to safeguard Personal Data during its transmission.

Dispute Resolution

Although DS has put into place reasonable safeguards to protect Personal Data, we recognize that there is no method of transmitting or storing Personal Data that is completely secure. If an employee, applicant or independent contractor has reason to believe that the security of his/her Personal Data has been compromised or misused, they should contact the local Human Resources Department for DS or, for the employees, their immediate supervisor.

DS will investigate and attempt to resolve complaints regarding use and disclosure of Personal Data in accordance with the principles contained in this Policy.

If the matter is not resolved through internal DS procedures, i.e. by contacting the local Human Resources Department for DS, then employees, applicants or independent contractors who are European Union residents may directly report the matter to the local Data Protection Authority (e.g., in France: the C.N.I.L). Non-European Union residents should follow local procedures for dispute resolution.

Unauthorized access to or misuse of Personal Data may be treated as serious offenses as required by local legislation and practice.

Data Integrity

DS will not process Personal Data in a way that is incompatible with the purposes for which it has been collected. To the extent necessary for those purposes, DS will take reasonable steps to ensure that Personal Data is relevant for its intended use, accurate, complete and current.

Contacting Us

Any questions or comments concerning this Policy can be submitted to the local Human Resources Department for DS or by email to DS.PrivacyPolicy@3ds.com.

Privacy Policy Effective Date and Revision Days

This Policy is communicated to our employees, applicants and independent contractors. Occasionally we may update this Policy to accurately reflect any changes to our privacy practices or as required to comply with legal requirements. The most recent policy will be published and will reflect the effective date.

The effective date of this Policy is November 30th 2009.