



Spotfire Cloud

Privacy & AI Governance

Data Sheet

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Introduction

Cloud Software Group endeavors to build products with privacy and data protection in mind, to comply with global *Data Protection by Design* obligations, to align with industry-standard *Privacy by Design* principles, and, perhaps most importantly, to meet customers' expectations. This means Cloud Software Group products go through an operationalized product privacy review as part of the product development lifecycle.

Purpose

This product privacy & AI governance data sheet's purpose is to provide information to assist Cloud Software Group customers and prospective customers assess Spotfire Cloud's privacy and data protection impacts.

Scope

This product privacy & AI governance data sheet primarily covers the Spotfire Cloud's personal data processing, from collection, transmission, use, and sharing to storage, retention, and deletion. It also covers the product's data security controls, features, and certifications, where available. It also incorporates an AI governance section, in anticipation of the proliferation of AI governance laws and regulation.

Product Summary

Spotfire Cloud gives users powerful self-service analytics and data visualization, and empowers decision makers to analyze data, share insights, and take action. Spotfire Cloud is a Software as a Service (SaaS) offering.



Types of Personal Data Collected & Processed

Spotfire Cloud collects and processes the following categories and types of personal data for the following purposes:

Data Category	Personal Data Captured? Y/N	Personal Data Element(s) Captured	Purpose(s) for Processing Personal Data
Product Admin User	Yes	Contact details such as email, first name, last name	Operational communications and user authentication
Product End User	Yes	Contact details such as email, first name, last name	User authentication
Product Upload ("Customer Content")	Yes	Up to the customer	Product and service delivery
Logs: Security	Yes	Device/machine ID, username, IP address	Security
Logs: Usage Data/Telemetry	Yes	Device/machine ID, username, IP address	License compliance, security, billing, product improvement and development

Lawfulness of Personal Data Processing

Cloud Software Group primarily processes personal information through our products as a "data processor" under applicable law, in line with our customers' (usually the "data controllers") instructions. These customer instructions are reflected in contract terms, product configurations, and other written instructions.

In limited instances, Cloud Software Group processes personal information as a "data controller" based on the following legal bases:

- consent from product end users;
- compliance with legal obligations; and
- legitimate interests, which may include, but are not limited to: product and data security, product license compliance, product improvement, and development of new products and product features.

Third-Party Vendors and Subprocessors

The applicable vendors and subprocessors that Cloud Software Group engages to assist in providing our products go through a vendor privacy and security review process. Subprocessors are required to sign a data protection agreement (DPA), as required under applicable law, and are added to our subprocessors lists, which are updated from time to time as new subprocessors are engaged.

To host Spotfire Cloud, in particular, Cloud Software Group has engaged a number of subprocessors, including AWS, which are set out in more detail within on the TIBCO subprocessors list located at <https://www.cloud.com/trust-center/sub-processor-list>.

Data Security

Spotfire Cloud has the following baseline security features:



- **Node PKI:** Node trust via PKI (Public Key Infrastructure) ensures the authenticity and integrity of nodes using digital certificates.
- **Secure Node Registration Process:** This process establishes trust between nodes and the application, preventing unauthorized access or malicious activities.
- **Encryption in Transit Data Transfer:** All data is encrypted in transit using inline encryption (TLS 1.2/higher with forward-secrecy ciphers).
- **HTTPS TLS 1.2:** Implementing HTTPS with TLS 1.2 encryption to secure data transmission over the internet, maintaining confidentiality and integrity.
- **Script Trust:** Validating and managing script execution to prevent malicious code from compromising the application's security.
- **Cryptography Standards and Algorithms:** Utilizing industry-standard cryptography techniques and algorithms to secure data within the application effectively.
- **Secure Communication within the Environment:** Encrypting data exchanged within the application environment to protect it from unauthorized access or interception.

Data Storage

Spotfire Cloud is a Software-as-a-Service cloud offering. As a cloud-hosted product, the data is hosted by AWS. Customers have the option to choose between the following regional instances: EU (Ireland) or US (Oregon).

Data Retention, Disposal & Return

Cloud Software Group retains Customer Content during the active subscription term and for 90 days after expiration or termination, or until the customer asks for such data to be deleted, whichever is sooner. The Customer's personal data is used for authentication and authorization.

If a Customer discontinues their Spotfire Cloud subscription, Customer Content is disposed of in accordance with terms of Cloud Software Group End User Agreement (EUA) incorporating the Cloud Software Group Data Processing Addendum. For trial users that do not purchase Spotfire Cloud after their trial, their data is disposed of after 90 days.

The Customer is able to export and download any Customer Content they have uploaded or created using Spotfire Cloud at any time during their active subscription, or by contacting support within the 90-day window after their subscription expires.

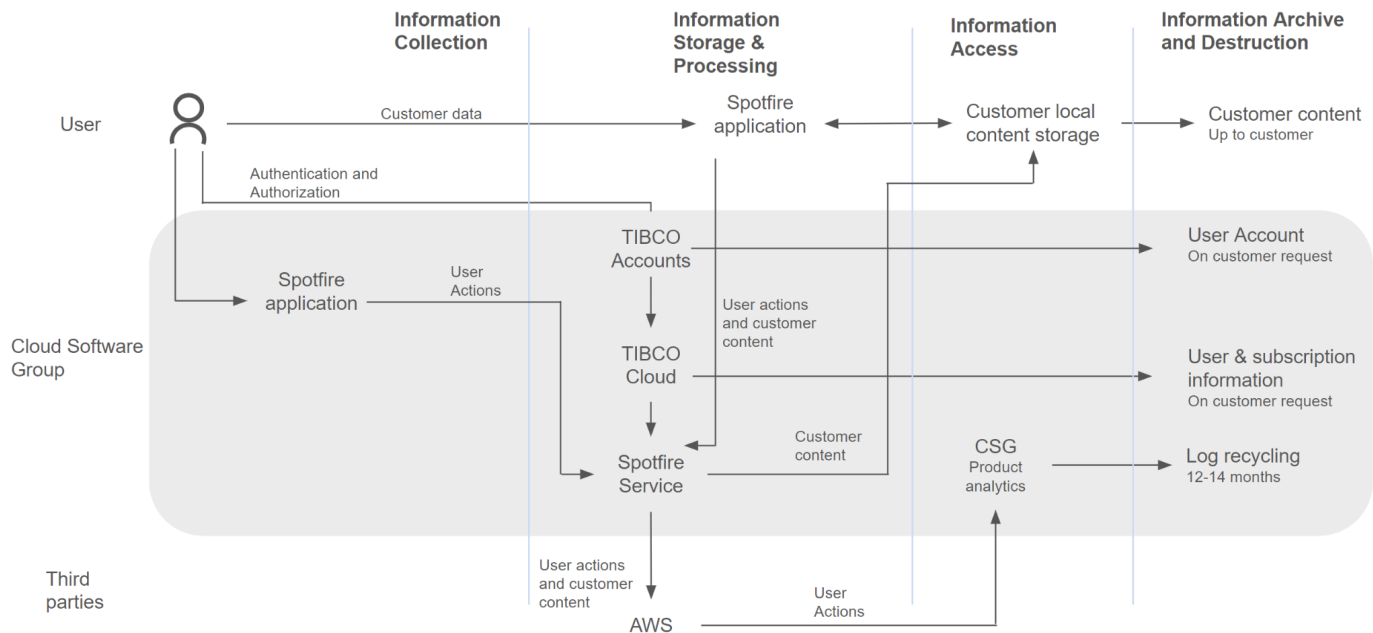
Other Information Relating to Spotfire Cloud's Privacy & Data Protection Impacts

- **Notice.** Cloud Software Group delivers a privacy notice to Spotfire Cloud users when they first sign up for a Spotfire Cloud account. The same privacy notice is available whenever they sign in to their account.
- **Data Minimization.** Spotfire Cloud only processes personal information for specific limited purposes. Upon termination or expiration of the contract, data (including personal information) is deleted in accordance with our EUA.
- **Data Subject Rights (DSR) Requests.** Spotfire Cloud customers can delete, correct, and/or access their Customer Content during the course of their active subscription, through self-serve features. Spotfire Cloud users can update their account-related personal information upon request. Other data subjects who are non-Spotfire Cloud users may submit a product-related DSR request with the relevant Spotfire Cloud customer, who bears primary responsibility for responding to such a request. Additionally, Cloud Software Group has operationalized a DSR request process, which forwards product-related DSR requests to the responsible customer to handle.
- **Cross-Border Data Transfers.** Customers may configure their Spotfire Cloud instance and pick between



an EU (Ireland) and US (Oregon) instance. Cloud Software Group relies on Standard Contractual Clauses (SCCs) to transfer personal information from the EU and the UK. Cloud Software Group also operationalizes transfer impact assessments with regard to such transfers. In our agreements with subprocessors, we also include EU Standard Contractual Clauses for transfers to countries not deemed to provide an adequate level of protection.

Data Flow Diagram



Artificial Intelligence (AI) Governance

As of the publication date of this data sheet, Spotfire Cloud does not include any AI systems as defined under the EU AI Act.

As a separate add-on that a Customer can deploy, Cloud Software Group provides the Spotfire Copilot™ AI functionality to perform the following tasks in Spotfire:

- Question-answering for Spotfire questions
- Question-answering for user-loaded documents
- Auto visualization generation and modification
- Data function generation
- Explanation of visualizations
- Data interrogation

Currently, Spotfire Copilot™ is a free, natural language extension to the Spotfire® platform. It leverages large language models (LLMs) to augment business intelligence and artificial intelligence.

It is important to consider the Spotfire Copilot™ as a *copilot* to the human user of Spotfire, similar to driver-assisting features in modern cars where the driver needs to keep their hands on the wheel. Likewise, the Spotfire user should vet the outputs of Spotfire Copilot™ at all times..

Spotfire Copilot™ is not a prohibited AI system as defined under the EU AI Act; nor does Cloud Software Group intend for Spotfire Copilot™ to be used as a safety component or any other high-risk classifications.¹

Related Resources

- [Spotfire Cloud Product Documentation](#)
- [Spotfire Copilot™ Overview](#)
- [Cloud Software Group End User Agreement \(EUA\)](#)
- [Cloud Software Group Services Security Exhibit](#)
- [Cloud Software Group Privacy Policy](#)
- [Cloud Software Group Sub-Processor-List](#)
- [Cloud Software Group Data Processing Addendum](#)
- [Cloud Software Group Privacy Statement](#)

About This Data Sheet

Please note that the information provided within this product privacy & AI governance data data sheet concerning technical or professional subject matter is for general awareness only. It may be subject to change without notice and does not constitute legal or professional advice, warranty of fitness for a particular purpose, or compliance with applicable laws. Customers are responsible for conducting their privacy/data protection and AI governance assessments of this product as implemented in their environment(s).

¹ The test for classifying high-risk AI systems is outlined in the EU AI Act, Ch. III, Sec. 1, Art. (1).