

Pantheon Systems, Inc. ("Pantheon") Privacy Policy for the U.K., EEA and Switzerland

Last Updated January 28, 2022

This Privacy Policy ("Privacy Policy") addresses how Pantheon Systems, Inc. and its affiliates, including Pantheon UK Private Limited, (collectively, "Pantheon") are committed to protecting your personal data. When we refer to "Pantheon," "we," "us," or "our," Questions regarding this statement should be e-mailed to privacy@pantheon.io. This Privacy Policy describes the ways we collect, use and share information. Our Privacy Policy applies whenever you visit the website or use the Services.

This Privacy Policy describes the types of information we may collect from you when you use this website, and the way that we use and process that information when you use this website, attend our conferences, request information about our services, and contract for services with us.

Pantheon is the data processor or the service provider, as defined under the EU General Data Protection Regulation (EU) 2016/679 ("GDPR"), processing personal information on behalf of and in accordance with the instructions provided by you. We are the controller or the "business," as defined under the GDPR for information that you provide when you visit our website or attend our conferences..

It is important that you read this Privacy Policy together with any other privacy policy or fair data processing policy we may provide on specific occasions when we are collecting or processing personal information about you so that you are aware of how and why we use your information. This Privacy Policy supplements other notices and privacy policies you may see when you fill out a form or use a particular part of this website to interact with us and does not override them.

Questions regarding this Privacy Policy should be emailed to privacy@pantheon.io or mailed to Legal/Privacy, Pantheon Systems, Inc., 717 California Street, Floor 2, San Francisco, California 94108. You may also call Pantheon at +1-855-927-9387 and ask for the General Counsel.

You have a right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues, at www.ico.org.uk. However, we would appreciate the chance to address your concern before you approach the ICO, so please contact us in the first instance at the email, mailing address or phone number listed directly above.

Not Intended for Children

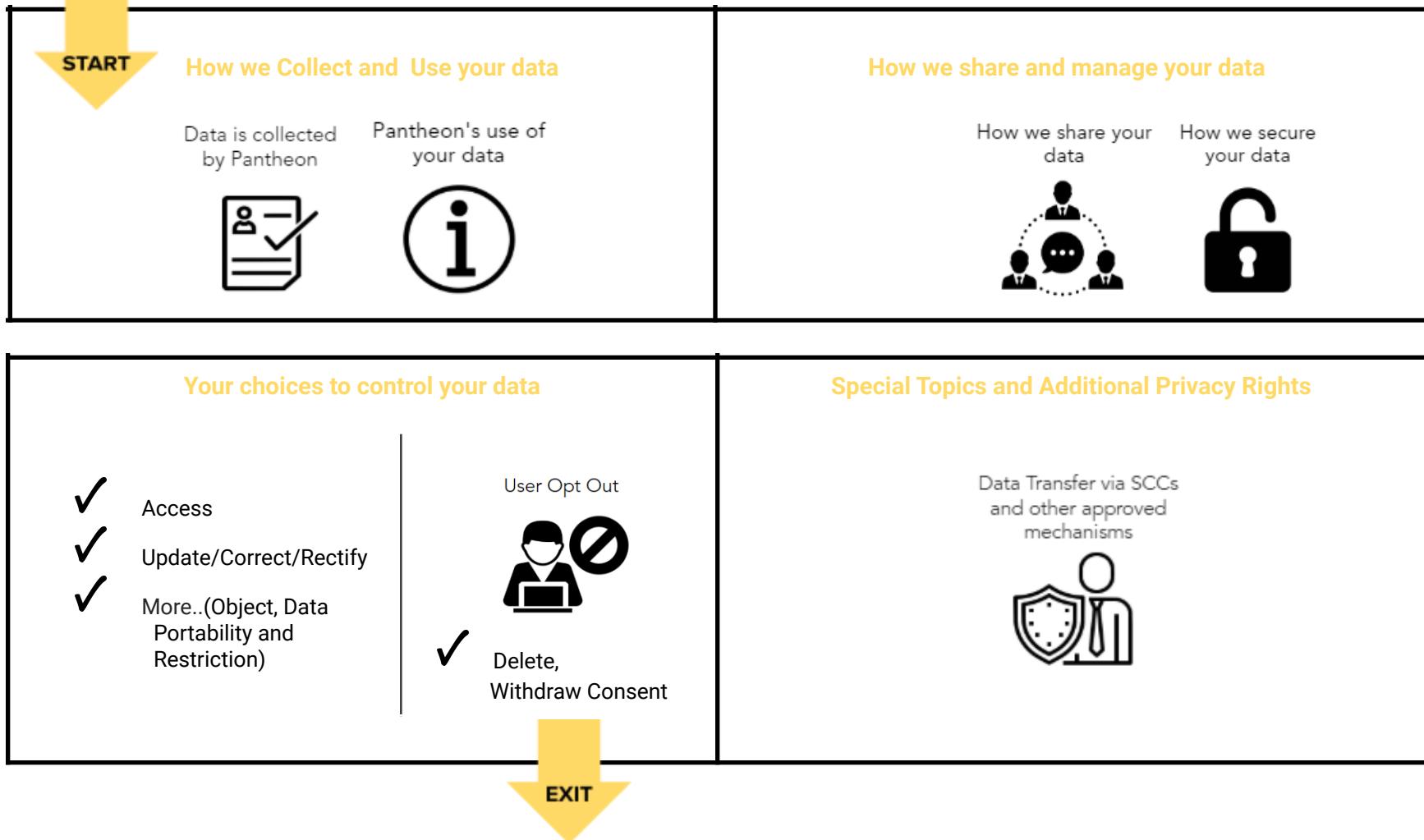
Pantheon's website properties and service offerings are not intended for children under the age of 17. We do not knowingly collect data relating to children. If you are under the age of 17, do not use or provide information on this website.

Policy Overview

User interacts
with Pantheon



How User Privacy is Protected at Pantheon



Agreement to Terms by Using this Website

Please read this Privacy Policy so that you are aware of how and why we use your data. When you use this website, you are agreeing to the terms of this Privacy Policy.

This Privacy Policy may change from time to time, as reflected in the revision date above. Your continued use of this website after we make changes is deemed acceptance of those changes.

Third Party Links

This website may contain links to third party websites, plug-ins and applications. Clicking those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites, plug-ins and applications and are not responsible for their privacy statements and practices. When you leave our website, we encourage you to read the privacy policy of every website you visit.

How we Collect and Use your Data

Information Gathered

Personal information or personal data means any information about an individual from which that person can be identified. It does not include data where the information that identifies a specific individual has been removed, such as pseudonymised or anonymised data.

We may collect, store, use and transfer different kinds of personal information about you, which information, and the circumstances of its collection, are grouped below:

- **Registration and Billing Information:** You may provide us with your contact information such as name, signature, e-mail address and company name and, when applicable, billing information such as billing address and a debit/credit card number, or bank account number and order form information, when you register for an account or purchase services. . We may also ask visitors or users for additional personal information such as their professional background, technical expertise and plans for using the Services. Users and visitors can choose not to provide this additional information by not entering it when asked or by contacting us directly using one of the ways noted above under Contact Details.
- **Log Data and Activity Tracking:** Pantheon collects certain information automatically from visitors and users of the Services, such as Internet addresses, browser types, referring domains, timestamps (time page accessed as well as time spent per web page), as well as the specific pages the visitor has requested.
- **Cookies:** We collect certain technical information automatically using cookies and similar technologies, including information from third parties. For more information, see our Cookie Policy at <https://pantheon.io/pantheon-cookies>.
- **User Data in Connection with Services:** We store and process user data in the context of providing the Services ("User Data"), which may include login data, browser type and version, location, operating system, and similar information. In addition, Pantheon users have their own privacy policies covering the use of personal information they collect and subsequently send to Pantheon via the Services, and the applicable user privacy policies apply in such cases except as specifically described in this Privacy Policy.

- **Marketing and Communications:** We collect, store, and process information that you provide to us when you communicate with us, including your preferences in receiving marketing materials from us and your communication preferences.

We also collect and use certain Aggregate Data, which has been anonymized, such as statistical data regarding use of our Services, for lawful purposes. For example, we may aggregate data to calculate the percentage of users accessing specific website features. As noted above, this type of data is not considered "personal information" subject to privacy laws and regulations.

We do not collect any Special Categories of Personal Data about you (including information regarding your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health or genetic or biometric data).

Information Use

We will only use your personal data when the law allows us to. See "Legal Basis for Processing," below.

Marketing and Promotion. Pantheon uses the information listed in the section above to contact users and visitors to further discuss their interest in the website and the Services, or to send users and visitors information regarding Pantheon or its partners, such as information about new features, promotions and events. Any such communications will be sent in accordance with users' and visitors' marketing preferences and consent choices. We may also email users with service-related information concerning the Services or the website, to the extent allowed by law and the commercial relationship between us. You may opt out of receiving marketing materials at any time by logging into the website and adjusting your marketing preferences or opting out..

Providing Pantheon's Services and Services Communications. Users of Pantheon's Services have a more specific relationship with us. As with all communications from Pantheon, we want to be sure we communicate with you according to your preferences, which can be set or changed at any time at <https://dashboard.pantheon.io>. User registration information is used to share updates regarding the Services for announcements, feedback requests, security updates, support, and other products and services communications and promotions made available by Pantheon.

Improvements. We also use visitor and user information to help deliver a better experience (for example, by displaying personalized content to you based on your interactions with the website), to diagnose technical problems, to support marketing activities and so that we may better administer and improve the quality of both the website and the Services.

Billing Coordination. All financial and billing information collected through the website is used solely to check the qualifications of prospective users and to bill for the Services. This billing information is not used by Pantheon for marketing or promotional purposes.

Data Management. Pantheon stores and processes User Data only on behalf of, and as instructed by, its users. User Data may be viewed or accessed by Pantheon for the purpose of resolving a problem or support issue. Pantheon may also access User Data and certain visitor information if necessary to investigate a suspected violation of the Terms of Use and Acceptable Use Policy for the Services, or as may be required by law or regulations. Users are responsible for maintaining the confidentiality and security of their user registration and password.

How we share and manage your data

Sharing of Information

Pantheon will not copy, distribute, or otherwise share any user or visitor data except as set out in this Privacy Policy. Pantheon may share users' and visitors' information in the following ways, subject to the existence of a legal basis for the sharing and processing of such information:

- **Credit card processing:** Pantheon uses a third-party service provider to manage credit card processing. This service provider is not permitted to store, retain, or use Billing Information except for the sole purpose of credit card processing on Pantheon's behalf.
- **Third party service providers:** Pantheon may partner with other parties to provide users with specific services such as user interfaces, connectors, dashboards, web hosting, and other administrative tools available for use via the Services. If a user registers for these services, we will share names or other contact information only to the extent necessary for the third party to provide these services. These service providers are required to agree to use the personal information of users and visitors solely for the purpose of providing the services, under Pantheon's instructions, to keep that information secure, and otherwise comply with all applicable data privacy laws and regulations.
- **Group companies:** From time to time we may provide information about users to Pantheon's group companies in order to provide those users with the Services. Each of these entities will process information for the purposes described in this Privacy Policy.
- **Potential acquirers of Pantheon's business:** If the stock or assets of Pantheon, its subsidiaries, its joint ventures or any combination of such are acquired by another entity, some or all of Pantheon users' and visitors' personal information may be provided to the successor. In such a case, the successor will be instructed to handle the personal information in the same manner as provided in this Privacy Policy.
- **Law enforcement:** We may be required in certain circumstances to disclose personal information in response to a lawful request by public authorities, the courts, law enforcement, or to comply with national security requirements. To the extent allowed by law, we will notify you before a disclosure is made, as well as seek to object to and/or limit the scope of the request.
- **Consent:** We may disclose your personal information to third parties where we have consent to do so, except as otherwise prohibited by law.

Legal Basis for Processing Personal Information

We will use your personal data when we are performing contractual obligations, where it is necessary for our legitimate interests and your interests and fundamental rights do not override our interest, or when necessary to comply with a legal obligation.

If you are a website visitor and have elected to submit your personal information to Pantheon, which includes instances where you are filling out a form where this Privacy Policy is posted, our legal basis for collecting and using your personal information will depend on the personal information concerned and the specific context in which we collected it. In these instances, Pantheon is the data controller. We may collect your personal information based on your consent, based on the contractual relationship between you and Pantheon and as necessary to provide the Services, or where the processing is in our legitimate interest.

In most cases, however, Pantheon is the data processor for purposes of carrying out our Service obligations to you, and any personal information that we may receive would be based on the collection, use or storage of such personal information on your websites hosted by Pantheon. We require users to ensure that they

have a lawful basis to transfer personal information to us. Any processing of personal information by us as a data processor will only be as authorized by the user and for no other purpose except as may be permitted by applicable law.

If we ask you to provide personal information to comply with a legal requirement or to contact you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory (as well as the consequences if you do not provide your personal information).

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us as indicated above.

Security

Pantheon uses appropriate administrative, technical, organizational, and physical security measures to protect our users' and visitors' information and data against accidental or unlawful destruction, loss, and alteration, and against unauthorised disclosure and access. We use standard industry practices to protect personal information, including firewalls, SSL encryption, system redundancies, and co-location in a 24/7 secured, controlled environment.

We have procedures in place to address any suspected personal data breach and will notify you and any applicable regulator of a breach when we are legally required to do so.

Data Transfers

Visitors' and users' information may be transferred to, and processed in, countries other than the country in which they reside. Specifically, Pantheon's website and Services are hosted on servers located around the world, including in the United States of America, the United Kingdom, the EEA, and elsewhere. Our group companies and third party service providers and partners may operate around the world. This means that when Pantheon collects visitors' and users' information, such information may be processed in any of these countries. Whenever we transfer your personal data outside of the UK or EEA, as the case may be, we ensure that a similar degree of protection is afforded to it by having at least one of the following safeguards in place: (i) the country to which we transfer your personal data has been deemed to provide an adequate level of protection for personal data, or (ii) we have in place specific contracts approved for use in the UK and EEA (the Standard Contractual Clauses approved by the European Commission). For more information about how we transfer visitors' and users' information, please contact privacy@pantheon.io.

You may direct inquiries or complaints concerning Pantheon's processing of personal information to privacy@pantheon.io. Pantheon will respond within the time prescribed by applicable law and, if applicable law does not address such time frame, within 30 days.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact the Information Commissions' Office (ICO), the United Kingdom regulator for data protection issues at www.ico.org.uk. We would, however, appreciate the chance to address your concerns before you approach the ICO, so please contact us in the first instance through one of the methodologies noted in the Introduction and Statement of Purpose, above.

Your choices to control your data

Accessing and Updating Contact Information

We encourage our visitors and users to access, update, correct and edit their contact information to keep the information current. Users can easily access, update, correct and edit their contact information at any time by logging into the Service and visiting the "Account" tab on the dashboard. Visitors can request such changes to their contact information by reaching out to us through one of the methodologies listed in the Introduction and Statement of Purpose.

Your Data Protection Rights

You can exercise any one of the following data protection rights as may be available to you under applicable law by contacting us through one of the methodologies listed in the Introduction and Statement of Purpose. We will acknowledge and respond to your data protection rights requests promptly and in all cases no later than within 30 days unless required sooner under applicable law. In certain jurisdictions, we may be able to process only a verified consumer request ("VCR").

You have the following data protection rights:

- You have the right to **access, correct, update or request deletion** of the personal information we collect about you. You can also make changes to your Pantheon personal or professional profile at any time by logging into the Service – see the heading "Accessing and Updating Contact Information" above.
- You have the right to **opt out of marketing communications** you previously consented to receive. See the heading "Unsubscribe from marketing" below or contacting us through one of the methodologies listed in the Introduction and Statement of Purpose above.
- You have the right to **object to processing** of your personal information, ask us to **restrict processing** of your personal information or to **request portability** of your personal information.
- If we have collected and process your personal information with your consent, you can **withdraw your consent** at any time by contacting us directly through one of the methodologies listed in the Introduction and Statement of Purpose, above. 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 information conducted in reliance on lawful processing grounds other than consent.
- You also have the right to **request erasure** of some or all your information from our systems.
- You have the right to **complain to the data protection authority** about our collection and use of your personal information. For more information, please contact the ICO, as noted in the Introduction and Statement of Purpose above, or your local data protection authority. (Contact details for data protection authorities in the European Economic Area are available here http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

If you wish to exercise any of the rights above, click [here](#) or please contact us by using the **Contact Details** below. You will not have to pay a fee to access your personal information or exercise the above rights, except that we may charge a fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your hererequest in these circumstances.

Contact Details: Send an email to privacy@pantheon.io or mail a request to Legal/Privacy, Pantheon Systems, Inc., 717 California Street, Floor 2, San Francisco, California 94108. You may also call Pantheon at +1-855-927-9387 and ask for the General Counsel.

We may need specific information from you to confirm your identity and ensure your right to access your personal data or exercise any of your rights. This is a security measure to ensure that your personal data is not disclosed to a person who does not have a right to receive it.

We endeavor to respond to all requests within 30 days; however, occasionally, it could take longer if your request is complex or you have made a number of requests. If this occurs, we will notify you and update you on the status of your request.

Receive Notice of Changes

Pantheon reserves the right to change this Privacy Policy from time to time as necessary to reflect changing legal, regulatory or operational requirements. Pantheon will provide notification of the material changes to this Privacy Policy through the website at least thirty (30) business days prior to the change taking effect. Where appropriate, we may also email users who have opted to receive communications from us notifying them of the changes in our privacy practices. If we are required by applicable data protection laws to obtain your consent to any material changes to this Privacy Policy, then we will do so before such changes take effect.

Data Retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with the Service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible. Under no circumstances do we retain data without a legitimate business need for greater than two years except as may be required under applicable law.

Unsubscribe from marketing

Visitors and users can opt out of further marketing communications at any time by following the instructions to unsubscribe that are included in every communication or contacting Pantheon at privacy@pantheon.io.

Pantheon Liability

Pantheon understands privacy is an imperative for many people and they seek out those providers in the market that share these values. In accordance with the GDPR principles, Pantheon remains liable for any processing of personal data from the EEA, UK or Switzerland by third-party agents acting on our behalf where such processing is inconsistent with the GDPR, unless Pantheon was not responsible for the event giving rise to any alleged damage.