

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

Last Updated April 29, 2024

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.

This Privacy Policy describes the types of personal data we may collect when you visit or use this website ("Site"), use our services ("Services"), or through other offline channels such as when you attend our conferences, call us, request information about our Services, etc., and how we use and disclose that personal data.

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 data 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 Site 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.

Not Intended for Children

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

Policy Overview

How User Privacy is Protected at Pantheon

User interacts with Pantheon



START

How we Collect and Use your data

Data is collected by Pantheon



Pantheon's use of your data



How we share and manage your data

How we share your data



How we secure your data



Your choices to control your data

- ✓ Access
- ✓ Update/Correct/Rectify
- ✓ More..(Object, Data Portability and Restriction)

User Opt Out



- ✓ Delete, Withdraw Consent

Special Topics and Additional Privacy Rights

Data Transfer via SCCs and other approved mechanisms



EXIT

Agreement to Terms by Using this Website

Please read this Privacy Policy so that you are aware of how and why we use your personal data. This Privacy Policy is incorporated into and subject to the Site Terms of Use - <https://legal.pantheon.io/ClientAgreements.html#contract-bkr0qf-ea>.

Third Party Links

This Site may contain links to third party websites, plug-ins applications and integrations. 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 or liable for any content, advertising, goods, services, or other materials on, available through, or provided by such websites, resources, or integrations. When you leave our website, we encourage you to read the privacy policy of every website you visit. We are not responsible for the privacy or other practices of such websites and cannot guarantee the security of personal data that you provide, or is collected by, such websites, applications, etc.

The Site contains embedded content (e.g., videos). Embedded content may place third-party cookies on your device that track your online activity to enhance your experience or assess the success of their application. We have no direct control over the information these cookies collect, and you should refer to their website privacy policy for additional information.

How we Collect and Use your Data

Information Gathered

Personal data means any information about an individual from which that person can be identified. It does not include 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:

- **Site Use, Registration, Billing Information, Contact 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, purchase Services, sign up to receive information, register for or attend one of our events, submit a job application, or otherwise interact with us. We may also ask you for additional personal data such as professional background, technical expertise and plans for using the Services.
- **Log Data and Activity Tracking:** Pantheon collects certain information automatically from visitors and users of the Site and 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 through the Site and Services automatically by using cookies and similar technologies, including cookies set by 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 data 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 “chat with an expert”, communicate with us electronically or in person, or interact with our chat bot, which may include your preferences in receiving marketing materials from us and your communication preferences.

We also collect and use certain aggregated data, which has been anonymized, such as statistical data regarding use of our Services. 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 data” subject to applicable privacy laws and regulations.

We do not request, and ask that you do not submit, 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).

We will not collect additional categories of personal data without first providing you notice. You can always limit the information you provide to us, but if you choose not to provide certain requested information, you may be unable to access some of the functionality, offers, or content available on the Site or Services or we may be unable to process your application.

Sources

We collect your personal data from the following sources:

You. We may collect and store information that you voluntarily provide through the Site or Services, or any other way we interact with you.

Related Entities and Affiliates. We may collect information about you from our related parties and affiliates, including joint ventures.

Social media and related services or websites. We may collect information through your social media services consistent with your settings on such services and as permitted by applicable law.

Service providers and contractors. When you obtain products and Services from us, we may collect your personal data from service providers and contractors who collect information about you that is needed to provide our products and Services.

Other third parties. We may collect information about you from third parties such as from your employer, or other third-party sources that are lawfully entitled to share your data with us.

Information Collected Automatically. When you navigate through and interact with our Site and Services, we may compile statistical information concerning your usage of the Site and Services including through third-party analytics services or from log data.

Information Use

When we collect personal data from your use of the Site, registration, or job application, or through other offline channels such as when you enter into a contract with us, call us, attend our events, etc., Pantheon is the data controller.

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 personal data listed in the section above to contact users and visitors to further discuss their interest in the Site 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 your marketing preferences and consent choices. We may also email users with service-related information concerning the Services or the Site, to the extent allowed by law and the commercial relationship between us. You may opt out of receiving marketing materials at any time by accessing the Site and adjusting your marketing preferences.

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.

Site Administration and Improvements. We also use your personal data 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, administer the Site, for research and development, 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 Site 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.

Everyday Business Purposes. Pantheon uses your personal data for other everyday business purposes (e.g., financial account management; product development; contract management; IT and website administration; corporate governance; record keeping, reporting and legal compliance; internal investigations; quality control and monitoring; to exercise or defend a legal claim; enforce our rights arising from any contracts entered between you and us; to respond to law enforcement requests; to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data is held by us is among the assets transferred; to assess your application for employment with us; and to fulfill any other purpose for which you provide it.).

When we process personal data as part of the Services, we do so as a data processor. We require Services users to ensure that they have a lawful basis to transfer or disclose personal data to us. Any processing of personal data 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.

How we share and manage your data

Sharing of Information

Pantheon will not copy, distribute, or otherwise share your personal data except as set out in this Privacy Policy or as permitted or required by applicable law. Pantheon may share personal data 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 use service providers, vendors and processors who collect or process personal data on our behalf for the Site, Services or other purposes including providing communications, data storage, security and fraud protection, marketing and promotional services, providing user interfaces, connectors, dashboards, web hosting, and other administrative tools available for use via the Services. These service providers, vendors and processors are required to agree to use the personal data solely in accordance with 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 data may be provided to the successor. In such a case, the successor will be instructed to handle the personal data in the same manner as provided in this Privacy Policy.
- **Law enforcement, Public Authorities, etc.:** We may be required in certain circumstances to disclose personal data as necessary to comply with national or local laws, 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.
- **Professional advisors.** We may disclose your personal data to professional advisors (e.g., lawyers, accountants, auditors).
- **Legal Claims.** We may disclose your personal data to third parties to investigate allegations or claims and establish, exercise or defend legal claims.
- **Consent:** We may disclose your personal data to third parties at your direction.

Legal Basis for Processing Personal Information

We will use your personal data when we are performing contractual obligations (e.g., credit card processing and related billing activities; providing the Services), where it is necessary for our legitimate interests and your interests and fundamental rights do not override our interests (e.g., certain marketing, promotional and advertising activities; Site administration, improvement and research and development; data management; everyday business purposes), based on your consent (e.g., where you register for an account, submit your email address to receive information, contact us, or submit an application for employment), and when necessary to comply with a legal obligation.

If we ask you to provide personal data 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 data 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 data, please contact us as indicated below.

Security

Pantheon uses appropriate administrative, technical, organizational, and physical security measures to protect our your personal 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.

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 Site 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 your personal data, such information may be processed in any of these countries. Whenever we transfer your personal data outside of the UK, EEA, or Switzerland 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 by the UK, EEA, and Switzerland (i.e.,

Standard Contractual Clauses approved by the European Commission and, as amended, by the UK and Switzerland). For more information about how we transfer visitors' and users' information, please contact privacy@pantheon.io.

Pantheon relies on legally-provided mechanisms to lawfully transfer data across borders. For instance, we use the European Commission-approved Standard Contractual Clauses (the "SCCs") to transfer personal information from the United Kingdom, EEA and Switzerland to the United States. Pantheon's SCCs are available [here](#).

Your choices to control your data

Accessing and Updating Contact Information

We encourage our Site and Service visitors and users to access, update, correct and edit the contact information you have provided to us to keep the information current. You can easily access, update, correct and edit your 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 below.

Your Data Protection Rights

You may have certain rights regarding the personal data we collect and maintain about you. 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 below. We will acknowledge and respond to your data protection rights requests promptly and in all cases no later than one month 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 in certain circumstances, subject to limitations:

- You have the right to **access or correct** the personal data we collect about you. You can also make changes to your Pantheon personal or professional profile at any time by logging into the Service.
- You have the right to **object to processing** of your personal data, ask us **to restrict processing** of your personal information or **to request portability** of your personal data.
- If we have collected and process your personal data with your consent, you can **withdraw your consent** at any time by contacting us directly through one of the methodologies listed below. 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.
- You also have the right **to request erasure** of some or all the personal data we collect about you.
- You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you.

You also have the right to submit a complaint to the data protection authority for your jurisdiction about our collection and use of your personal data. For more information, please contact the ICO or your local data protection authority, see below.

Contact Details to Exercise a Right, Ask a Question, or Submit a Complaint

If you wish to exercise any of the rights above, click [here](#) or please contact us 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.

You will not have to pay a fee to access your personal data or exercise the above rights, except that we may charge a fee if your request is clearly unfounded, repetitive, or excessive. 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 one month; 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.

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 or the data protection authority in your jurisdiction. We would, however, appreciate the chance to address your concerns before you approach a data protection authority, so please contact us in the first instance through one of the methodologies noted, above. 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.

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 practices, we address in this Privacy Policy, then we will do so before such changes take effect.

You understand and agree that your continued use of the Site, Services or interactions with us through offline channels after the effective date means that the collection, use, and sharing of your personal data is subject to the updated Privacy Policy. Except to the extent permitted or required by applicable law, we will handle your personal data in accordance with the terms of the Policy in effect at the time of the collection.

Data Retention

We retain personal data we collect from you for the period required to satisfy the purpose for collection, where we have an ongoing legitimate business need to do so (for example, for billing purposes, resolving disputes, to comply with applicable legal, tax or accounting requirements).

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

Unsubscribe from Marketing

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