

Pantheon Systems, Inc.

Privacy Policy for the U.K., EEA and Switzerland

Last Updated September 15, 2026

This Privacy Policy ("Privacy Policy") addresses how Pantheon Systems, Inc. and its group companies, including Pantheon Platform UK Limited and Pantheon Platform Ireland Limited, and Pantheon Platform International, Inc. are committed to protecting your personal data. This Privacy Policy applies to each group company. References to "Pantheon", "we", "us" or "our" are to the relevant group entity that is responsible for processing your personal data.

This Privacy Policy applies to the processing of personal data of individuals in the UK, EEA and Switzerland and describes the types of personal data we may collect including 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. The data controller of your personal data is: for individuals in the UK, Pantheon Platform UK Limited; for individuals in the EEA and Switzerland, Pantheon Platform Ireland Limited; and, in respect of personal data processed in connection with the Site and Services hosted in the United States, Pantheon Systems, Inc. and Pantheon Platform International, Inc.

We have separate privacy policies that set out how we process the personal data of our current and former staff and applicants, and this Privacy Policy does not apply to that processing. Individuals applying to work for us should refer to our Applicant Privacy Policy for the U.K., EEA and Switzerland, available at <https://legal.pantheon.io>. Current and former staff should refer to our Employee Privacy Policy for the U.K., EEA and Switzerland available on Pantheon Central or upon request to privacy@pantheon.io.

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.

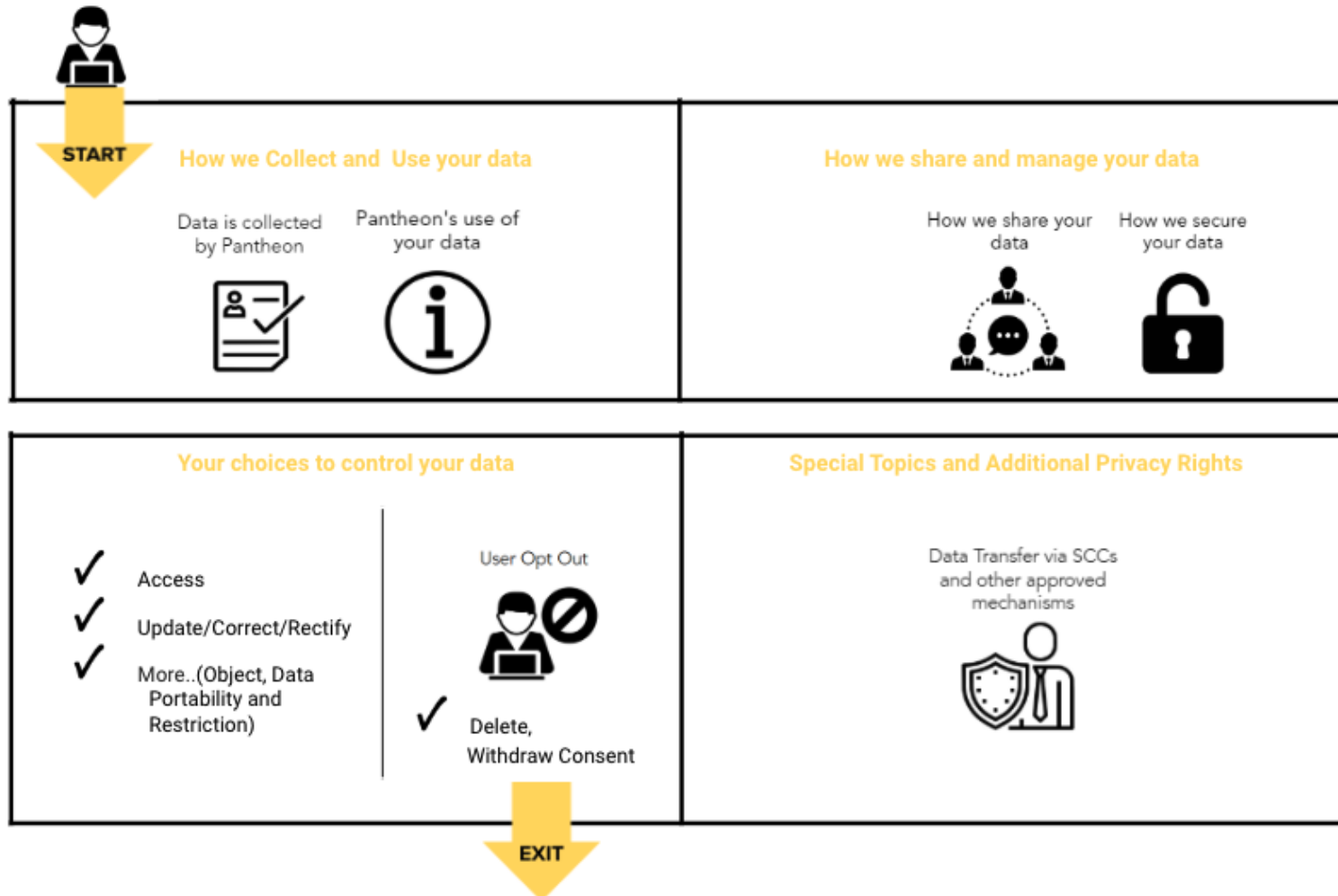
Not Intended for Children

Pantheon's Site and Services are not intended for children under the age of 16. We do not knowingly collect personal data relating to children. If you are under the age of 16, do not use or provide information on this Site.

Policy Overview

User interacts
with Pantheon

How User Privacy is Protected at Pantheon



Terms of Use

Please read this Privacy Policy so that you are aware of how and why we use your personal data. Your use of this Site is subject to the Site Terms of Use - <https://legal.pantheon.io>.

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 anonymised data.

We may collect, store, use and transfer different kinds of personal data 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, job title and employer or 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, 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, 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) or information about criminal convictions and offences.

Where we need to collect your personal data by law or in order to provide our Services or perform a contract we have with you and you choose not to provide it to us, we may not be able to provide our Services or perform the contract we have or are trying to enter into with you.

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.

Legal Basis for Processing Personal Data

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 interests, based on your consent, and when necessary to comply with a legal obligation. Less commonly, we may need to process your personal data in emergency situations when it is in your vital interests or those of another person, or where a recognised legitimate interest applies. The specific purposes for which we process personal data and our lawful basis or bases for each purpose are set out in the table below.

Purpose	Lawful Basis
Marketing and Promotion Pantheon uses personal data to contact individuals including users and visitors to further discuss their interest in the Site and the Services, or to send	Legitimate interests

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. Where required by applicable e-privacy rules (such as PECR in the UK and the ePrivacy rules in the EEA), we will only send you electronic marketing communications with your consent or as otherwise permitted by those rules. You may opt out of receiving marketing communications at any time by following the unsubscribe instructions included in every communication, by adjusting your marketing preferences, or by contacting us at privacy@pantheon.io.	We have a legitimate interest in carrying out marketing and promotional activities to promote our business and Services. Consent Where we cannot rely on our legitimate interests to process your personal data for any of these purposes, we will do so only with your consent.
Providing Pantheon's Services We use personal data to provide Services to users or to take steps before we provide Services.	Performance of a contract We need to process personal data to perform a contract with you. Legitimate interests We have a legitimate interest in providing Services.
Sending Services Communications We use personal data to communicate with users. 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 made available by Pantheon.	Performance of a contract We need to process personal data to perform a contract with you. Legitimate interests We have a legitimate interest in communicating with users of our Services. Legal obligation We need to process personal data to comply with a legal obligation we are subject to.
Holding and Arranging Conferences and Events We use personal data to hold and arrange conferences and events.	Legitimate interests We have a legitimate interest in holding and arranging conferences and events.
Billing Coordination We use personal data for billing purposes. 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.	Performance of a contract We need to process personal data to perform a contract with you. Legitimate interests We have a legitimate interest in checking the qualifications of prospective users and collecting amounts due to us.
Everyday Business Purposes (Administrative and Management Purposes) We use your personal data for other everyday business purposes. This includes 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 respond to law	Legitimate interests We have a legitimate interest in carrying out our own administrative and management functions.

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; and to fulfill any other purpose for which you provide it).	
Protecting our Business and Site We may use your personal data to protect our business and Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). 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.	Legitimate interests We have a legitimate interest in the provision of administration and IT services, network security, preventing fraud, and protecting our business and Site. Recognised legitimate interests Where applicable, we may rely on the 'recognised legitimate interests' lawful basis (crime prevention), where applicable in the UK.
Improving and Tailoring our Services and Site We may use your personal data to carry out analysis and market research and to carry out marketing activities, including online advertising. We may also use your personal data to provide tailored services to users and to improve our Site and Services more generally.	Legitimate interests We have a legitimate interest in improving and tailoring our Services and Site. Consent Where we cannot rely on our legitimate interests to process your personal data for any of these purposes, we will do so only with your consent.
Complying with our Legal Obligations We may use your personal data to comply with our legal obligations.	Legal obligation We need to process personal data to comply with a legal obligation we are subject to.
Establishing our Legal Position We may use your personal data, including sharing it with our legal advisers, when looking to establish our legal position. This includes exercising our legal rights and defending legal claims.	Legitimate interests We have a legitimate interest in understanding and establishing our legal rights and obligations.

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.

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.

Security

Pantheon uses appropriate administrative, technical, organizational, and physical security measures to protect 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 data, 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 or elsewhere. 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 appropriate approved transfer mechanisms (i.e., the EU Standard Contractual Clauses, the UK International Data Transfer Agreement or Addendum, and the Swiss-recognised versions of the EU Standard Contractual Clauses). For more information about how we transfer visitors' and users' information, please contact privacy@pantheon.io.

Pantheon Systems, Inc. and Pantheon Platform International, Inc. ("Pantheon US") comply with the EU-U.S. Data Privacy Framework ("EU-U.S. DPF"), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework ("Swiss-U.S. DPF") as set forth by the U.S. Department of Commerce. Pantheon Systems, Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles ("EU-U.S. DPF Principles") with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Pantheon Systems, Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles ("Swiss-U.S. DPF Principles") with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. Pantheon's U.S. subsidiary, Pantheon Platform International, Inc., is also certified under these frameworks and is bound by the same obligations and principles. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework ("DPF") program, please visit <https://www.dataprivacyframework.gov/> and you can view the certification for Pantheon US at <https://www.dataprivacyframework.gov/list>.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Pantheon US commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF to TRUSTe, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://feedback-form.truste.com/watchdog/request> for more information or to file a complaint. The services of TRUSTe are provided at no cost to you. Under certain conditions, you may invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms.

You may direct inquiries or complaints concerning Pantheon US's processing of personal data to privacy@pantheon.io. Pantheon will respond within one month.. Pantheon US is subject to the investigatory and enforcement powers of the Federal Trade Commission ("FTC"). The FTC has jurisdiction over Pantheon US's compliance with the EU-US DPF and the UK Extension to the EU-US DPF, and the Swiss-US Data Privacy Framework ("Swiss-US DPF").

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, Pantheon commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF in the context of the employment relationship.

In the context of an onward transfer, Pantheon US is responsible for the processing of personal data it receives under the DPF Principles and subsequently transfers to a third party acting as an agent on our behalf. Pantheon US will remain liable under the DPF Principles if our agent processes your personal data in a manner inconsistent with the DPF Principles.

Your choices to control your data

Accessing and Updating Contact Information

We encourage our Site and Service visitors and users to keep their contact details current by accessing and updating their information. Users can easily access and update 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.

You have the following data protection rights in certain circumstances, subject to limitations:

- You have the right to **access** or ask us to **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 data or **to request portability** of your personal data.
- If we rely on consent to 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 have the right **not to be subject to a decision based solely on automated processing**, including profiling, which produces legal or similarly significant effects concerning you. We do not currently make decisions of this kind.
- You also have the right **to request erasure** of some or all the personal data we collect about 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. Alternatively, we may refuse to comply with your request. 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 data 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 one month.

You have the right to contact the ICO (UK), the Federal Data Protection and Information Commissioner (Switzerland, contact details available at <https://www.edoeb.admin.ch>) 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 the ICO are available at www.ico.org.uk and contact details for data protection authorities in the European Economic Area are available here [European Data Protection Board - Members](#).

Receive Notice of Changes

Pantheon reserves the right to change this Privacy Policy from time to time including as necessary to reflect changing legal, regulatory or operational requirements. Pantheon will take reasonable measures to communicate any substantial changes that we make to this Privacy Policy to you - for example, by posting an updated version of this Privacy Policy on our Site or by emailing you. We also encourage you to check this page from time to time for any changes.

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).

Our retention periods are based on the requirements of relevant data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and our business purposes.

If you would like further details regarding applicable retention periods, please contact us using the contact details set out above.

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.