

# Pantheon Systems, Inc. ("Pantheon") Privacy Policy

*Last Updated July 19, 2023*

This Privacy Policy ("Privacy Policy") addresses how Pantheon Systems, Inc. ("we," "our," "Pantheon") handles information we gather from third parties including, but not limited to, visitors to <https://pantheon.io> (the "website") and users of the Pantheon services. 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.

Questions regarding this statement should be e-mailed to [privacy@pantheon.io](mailto:privacy@pantheon.io) or mailed to Privacy, Pantheon Systems, Inc., 717 California Street, Fl. 2, San Francisco, CA 94108. You may also call us toll free at 855-927-9387 and ask for the General Counsel or Privacy Counsel.

Pantheon is the data processor or the service provider, as defined under the EU General Data Protection Regulation (EU) 2016/679 ("GDPR") and California Consumer Privacy Act of 2018 ("CCPA"), respectively, processing personal data/person information on behalf of and in accordance with the instructions provided by users of the Pantheon service. We are the controller or the "business," as defined under the GDPR and the CCPA, respectively, for information that you provide when you visit our website or apply for a job with Pantheon.

Pantheon has a separate, more detailed Privacy Policy with regard to the UK, EEA and Switzerland. If you reside in any of those regions, you should refer to that separate Privacy Policy for further detail on your rights and our responsibilities.

## **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

### 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

### Special Topics and Additional Privacy Rights



<ul style="list-style-type: none"> <li>✓ Access</li> <li>✓ Update/Correct/Rectify</li> <li>✓ More..(Object, Data Portability and Restriction)</li> </ul>	<p>User Opt Out</p>  <p>✓ Delete, Withdraw Consent</p>	<p>California Consumers</p>  <p>Data Transfer via SCCs and other approved mechanisms</p> 
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## 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 agree to 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, to reflect changing legal, regulatory or operational requirements. Pantheon will provide notification of 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 changes to this Privacy Policy. 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.

Your continued use of this website after we make changes is deemed acceptance of these terms.

## 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 data or personal information 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 pseudonymized or anonymous data.

We may collect, store, use and transfer different kinds of personal information about you, which information and the circumstances of collection are group 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 through one of the means noted in the Introduction.
- **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 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, Google Workspace files 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 regulations because it cannot be used to identify a particular person.

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, health, genetic or biometric data, or other information that regulators have deemed sensitive).

## Information Use

**We will only use your personal information when the law allows us to.**

**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 option 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 may be used to share updates regarding the Services and 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 as well as for providing the Services. 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:

- **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 services, under Pantheon's instructions, to keep that information secure, and otherwise to handle personal information in the same manner as provided in this Privacy Policy.
- **Group companies:** From time to time we may provide information about users to Pantheon's subsidiaries and affiliates 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, or affiliates 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 users' and visitors' personal information with third parties where we have consent to do so, except as otherwise prohibited by law.

### 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 unauthorized disclosure and access. We use standard industry practices to protect visitor and

user information, including firewalls, SSL encryption, limiting storage of financial information to a PCI compliant third party provider, 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 in the United States of America, and 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. For more information about how we transfer visitors' and users' information, please contact [privacy@pantheon.io](mailto: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](#).

You may direct inquiries or complaints concerning Pantheon's processing of personal information to [privacy@pantheon.io](mailto:privacy@pantheon.io). Pantheon will respond within 30 days. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third-party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>. Pantheon is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

## Your choices to control your data

### Accessing and Updating Contact Information

We encourage our visitors and users to access, update and edit their contact information and keep it 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 at [privacy@pantheon.io](mailto:privacy@pantheon.io), or through one of the other methods set forth in the Introduction to this Privacy Policy.

### 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 at [privacy@pantheon.io](mailto:privacy@pantheon.io) or through one of the other methods set forth in the Introduction to this Privacy Policy. 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 may have the following data protection rights:

- You may 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**, even if you have previously consented to receiving them. You may opt out at any time.
- You may have the right to **request portability of your personal information**.
- If we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time by contacting us through one of the methods below.
- You may also have the right to request **erasure** of some or all your information from our systems.

In order to exercise your data protection rights, click [here](#) or email us at [privacy@pantheon.io](mailto:privacy@pantheon.io). You may also mail your request to Privacy, Pantheon Systems, Inc., 717 California Street, Fl. 2, San Francisco, CA 94108.

## 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 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 within a two-year period. 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.

## Special Topics and Additional Privacy Rights

### For California Consumers

For purposes of this section, “Personal information” has the meaning given in the California Consumer Privacy Act of 2018 (“CCPA”) but does not include information exempted from the scope of the CCPA (e.g., de-identified consumer information or sector-specific privacy laws like the Gramm-Leach Bliley Act). We will be able to process the request for access and the request for deletion that is made by VCR, unless an exception applies.

Unless stated otherwise in the agreement that you have entered with Pantheon, in accordance with the CCPA, the chart below lists the categories of Personal Information that we have collected from visitors, users, and applicants, and the purpose of collection of such personal information in the past twelve (12) months. We do not collect personal information related to biometric information, sensory data, non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)), or inferences drawn from other personal information.

Further, as noted above, Pantheon does not sell your Personal Information.

Category	Personal Information Collected	Sources of Personal Information	Disclosure of Personal Information	Purpose of collection / processing
Identifiers	Real name, postal address,	<ul style="list-style-type: none"> <li>• Registration and Billing</li> </ul>	<ul style="list-style-type: none"> <li>• Credit Card</li> </ul>	<ul style="list-style-type: none"> <li>• Providing Pantheon's Services</li> </ul>

	unique personal identifier, online identifier, Internet Protocol address, email address, account name, company name, driver's license number, or other similar identifiers	<p>Information</p> <ul style="list-style-type: none"> <li>• Log Data and Activity Tracking</li> <li>• Cookies</li> <li>• User Data in Services</li> <li>• Services Communications</li> <li>• Applicant</li> </ul>	<p>Processing</p> <ul style="list-style-type: none"> <li>• Third party Services</li> <li>• Service Providers</li> <li>• Group Companies</li> <li>• Potential acquirers of Pantheon's business</li> <li>• Law Enforcement</li> <li>• Consent</li> </ul>	<ul style="list-style-type: none"> <li>• Marketing and Promotion</li> <li>• Services Communications</li> <li>• Improvements</li> <li>• Billing Coordination</li> <li>• Data Management</li> <li>•</li> </ul>
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, signature, physical characteristics or description, address, telephone number, education, employment, bank account number, credit card number, debit card number, or any other financial information, or medical or health information	<ul style="list-style-type: none"> <li>• Registration and Billing Information</li> <li>• Applicant</li> <li>• Services Communication</li> </ul>	<ul style="list-style-type: none"> <li>• Credit Card Processing</li> <li>• Third party Services</li> <li>• Service Providers</li> <li>• Group Companies</li> <li>• Potential acquirers of Pantheon's business</li> <li>• Law Enforcement</li> <li>• Consent</li> </ul>	<ul style="list-style-type: none"> <li>• Providing Pantheon's Services</li> <li>• Marketing and Promotion</li> <li>• Services Communications</li> <li>• Improvements</li> <li>• Billing Coordination</li> <li>• Data Management</li> <li>•</li> </ul>
Commercial information	Records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	<ul style="list-style-type: none"> <li>• Registration and Billing Information</li> <li>• Log Data and Activity Tracking</li> <li>• User Data in Services</li> <li>• Services Communication</li> </ul>	<ul style="list-style-type: none"> <li>• Credit Card Processing</li> <li>• Third party Services</li> <li>• Service Providers</li> <li>• Group Companies</li> <li>• Potential acquirers of Pantheon's business</li> <li>• Law Enforcement</li> <li>• Consent</li> </ul>	<ul style="list-style-type: none"> <li>• Providing Pantheon's Services</li> <li>• Marketing and Promotion</li> <li>• Services Communications</li> <li>• Improvements</li> <li>• Billing Coordination</li> <li>• Data Management</li> </ul>
Internet or other similar network activity	Browsing history, search history, information on a user or visitor's interaction with a website, application, or advertisement	<ul style="list-style-type: none"> <li>• Log Data and Activity Tracking</li> <li>• Cookies</li> <li>• User Data in Services</li> </ul>	<ul style="list-style-type: none"> <li>• Third party Services</li> <li>• Service Providers</li> <li>• Group Companies</li> <li>• Potential acquirers of Pantheon's business</li> <li>• Law Enforcement</li> </ul>	<ul style="list-style-type: none"> <li>• Providing Pantheon's Services</li> <li>• Marketing and Promotion</li> <li>• Services Communications</li> <li>• Improvements</li> <li>• Billing Coordination</li> <li>• Data Management</li> </ul>
Geolocation data	Physical location or movements	<ul style="list-style-type: none"> <li>• Log Data and Activity Tracking</li> </ul>	<ul style="list-style-type: none"> <li>• Third party Services</li> <li>• Service Providers</li> <li>• Group Companies</li> <li>• Potential acquirers of Pantheon's business</li> </ul>	<ul style="list-style-type: none"> <li>• Providing Pantheon's Services</li> <li>• Improvements</li> <li>• Billing Coordination</li> <li>• Data Management</li> </ul>



			• Law Enforcement	
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**California's "Shine the Light" law** (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@pantheon.io](mailto:privacy@pantheon.io).

**Non-discrimination.** We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not deny you goods or services, charge you different prices or rates for goods or services, including through granting discounts or other benefits or imposing penalties, provide you a different level or quality of goods or services, suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

**Pantheon does not sell personal information.** Pantheon does not "sell" your personal information as we understand this to be defined in the CCPA. Pantheon does, however, use services provided by Google, Facebook and other advertising companies that track website visitor activity to help deliver interest-based ads to those visitors. Your preferences may be managed in this regard by visiting our Cookie Policy at <https://pantheon.io/pantheon-cookies> and managing your preferences.

## Pantheon Content Cloud Service

With your consent, Pantheon Content Cloud Service will access, use and store information received from Google APIs. Such access, use and storage are subject to this Privacy Policy and will comply with the requirements of [Google's API Services User Data Policy](#), including the Limited Use requirements.

## Pantheon Liability

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