

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

*Last Updated April 29, 2024*

This Privacy Policy ("Privacy Policy") addresses how Pantheon Systems, Inc. ("we," "our," "Pantheon") collects, uses and shares personal information ("PI") we collect online from visitors to <https://pantheon.io> (the "Site"), users of the Pantheon services ("Services") and through offline channels.

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.

## **Individuals located in the UK, EEA, and Switzerland**

Pantheon has a separate Privacy Policy for individuals located in the UK, EEA, and Switzerland (for purposes of this reference, "EU Privacy Policy"). If you reside in any of those regions, please refer to our EU Privacy Policy for information on your rights and our responsibilities.

## **Not Intended for Children**

Pantheon's Site is 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 Site.

## 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

California Consumers



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 PI. This Privacy Policy is incorporated into and subject to the Site Terms of Use - <https://legal.pantheon.io/ClientAgreements.html#contract-bkr0qf-ea>. Unless otherwise noted, your use of the Site and continued interactions with us constitute your agreement to Pantheon using information about you in accordance with this Privacy Policy. If you do not consent to the collection, use, disclosure, and retention of your PI as described in this Privacy Policy, please do not provide us with such information.

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

## 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 Site, 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 sites and cannot guarantee the security of PI that you provide, or is collected by, such sites, 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 information means any information about an identified or identifiable individual. We collect, store, use, disclose and transfer PI about you, which may include:

- **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 or subscribe to receive news, tutorials and tips. 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 “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.
- **Careers.** We collect information you submit when you apply for a job on our careers page. This may include your name, email address, phone, cover letter and resume/CV, LinkedIn profile, and/or website.

We also collect and use aggregated or anonymized data, which cannot identify you, 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.

We will not request and ask that you do not submit data regarding your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, health, genetic or biometric data.

We will not collect additional categories of PI 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.

## Cookies and Web Technologies

Our Site uses cookies and other web technologies to collect and store certain information when you visit or use the Site.

A cookie is a small file consisting of letters and numbers. This file uniquely identifies and recognizes your browser or device and transmits information to the server. Some of these cookies are placed by us (i.e., first-party cookies) and others are placed by third parties (i.e., third party cookies). We use the following cookies on the Site:

- **Strictly Necessary/ or Essential Cookies:** These cookies are essential to the basic operation of our Site. They help identify you when you sign in, remember the information you input in an online form, enable you to navigate around the Site, use its features, or provide you with services you have requested. Without these cookies, we may be unable to provide the Site or certain services or features.
- **Performance/Analytics Cookies:** These cookies gather information on your use of the Site. For example, how you interact with the Site so we can improve it and whether the Site is working properly. Some of these cookies may be analytics cookies set by companies that analyze how you use the Site in order to help us improve and optimize the Site and the products and services we offer.

- *Functionality/Personalization Cookies:* These cookies help save information you have entered so the Site can recognize you, remember your username, remember your choices such as font size and color or language, or personalize the Site's content when you return. The information these cookies collect may be anonymized and set by us or by a third party.
- *Advertising/ or Targeting Cookies:* These cookies help us provide relevant advertising to you, measure its effectiveness, or limit the number of times you have seen it. They may record your visit to the Site including the links you follow to other sites so we can tailor the Site, communications, and advertising or remember whether you have visited the Site before. These technologies may also collect information including details about the device you use to access the Site (e.g., your computer or mobile phone), your IP address, browser type and operating system. Some of these cookies may follow you when you leave the Site and travel to other websites so that we can serve personalized ads targeted to your preferences. We may place some of these cookies on your device or third parties, such as our advertising partners or service providers, may place them when you visit the Site. We use third-party companies to serve advertisements (banners or links) on our behalf across the Internet. These advertising companies use tracking technologies (including cookies and pixel tags) to collect non-identifiable information about your visits to the Site and your interactions with our products in order to provide tailored advertisements based on your interests and browsing of the Site.

The Site also uses:

*Web beacons.* These small electronic files, also known as pixels, are set by us or third parties, help with functions such as tracking, analytics, counting Site visitors or for related marketing and media services. These pixels may collect your email, name, order items and ID, page ID, quantity, unit price, size, and product ID. This data is anonymized.

*Email pixel tracking.* We may embed email pixels in emails we send you. When you open the email, it sends back information. These pixels help us determine information including how many people open our emails, click on links, the percentage of recipients who read email on their phones, etc. We use this information for marketing purposes and to learn more about our audience.

*Facebook meta pixel.* This pixel is used for tracking and serving targeted ads. It tracks information such as your page view, view content, search, add to cart or Wishlist, purchase information, sign up, download, submit form, or user information (IP address, browser information). This data is anonymized.

*URL trackers.* These third party trackers are strings of code that track user behavior after clicking on a URL for marketing purposes. This data is anonymized.

*Browser/device/online fingerprinting.* These third party tools use scripts to track the attributes of the visitor's device or browser to build a profile of the user.

*Chatbot.* The Site uses a chatbot to process and respond to user questions. The chatbot is an automated bot. The user's interaction with the chatbot is recorded and aggregated for customer relations management history.

*Session replay.* We record your interaction with the Site to help us analyze and understand how the Site is utilized by visitors and to help improve it. This tool may record information such as your clicks, scrolls and mouse movements, feedback polls, country, duration, device, name, email, ID, browser, OS, and IP address. This data is anonymized.

*Social media widgets.* The Site includes social media features, such as the Facebook, LinkedIn, and YouTube widgets. These features may collect information about you such as your IP address and which page you are visiting on the Site. They may set a cookie or employ other tracking technologies to accomplish this. Social media features and widgets may be hosted by a third party. Your interactions with those features are governed by the privacy policies of the companies that provide them.

*Google Analytics.* The Site uses Google tools to help us analyze utilization of the website, track users, help with remarketing and audience or customer match. The tools we use include Google Analytics, Google AdWords, and Google Tag Manager. These tools collect user information (e.g., IP address, browser, device type, OS, location), website traffic information, content information (e.g., page views), goal completion (e.g., completion of certain actions on the website such as making a purchase), e-commerce information (e.g., average order value, product views). This information is aggregated.

*Exercising Choice.* The Help Menu on the menu bar of most browsers will tell you how to block or refuse cookies, how to have the browser notify you when you receive a new cookie, and how to disable cookies altogether. However, you may need to adjust your preferences manually each time you visit a website. Please note that if you block certain cookies, some of the services and functionalities of the Site may not work and you may be required to re-enter any user IDs and passwords more frequently.

**IMPORTANT: By using the Site, you consent to the processing of any personal information for the functions described above.**

## 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 including when you register, communicate with us, submit a job application or are employed by us.

*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 PI from service providers and contractors who collected information about you that is needed to provide those 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, we may compile statistical information concerning your usage of the Site through third-party analytics services or from log data. To do so, we may collect information about your equipment, browsing actions, patterns of traffic flowing through the Site, sites that refer visitors to the Site, pages of the Site that visitors use as entry and exit points, browser and operating systems and versions used by visitors to the Site, etc. Analytics services providers may transfer this information to third parties in case of a legal obligation or if a third-party processes data on behalf of that service. When you visit our Site or open an email, our online data partners or vendors may use cookies, ad beacons, and similar technologies to associate these activities with information they or others have about you, including your email address and share it with us.

## Information Use

In general, we use the PI we collect only for the purpose it was collected, for compatible purposes, as permitted or required by law, as necessary to carry out our contractual duties and obligations, and as otherwise provided in this Privacy Policy. For example, we may use your PI in the following ways:

**Marketing and Promotion.** Pantheon uses the information 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 users' and visitors' 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 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.

**Site Administration and 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, administer the Site, for research and development, to support marketing activities and so that we may better administer and improve the quality of both the Site 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 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.

**Everyday Business Purposes.** 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 including billing and collection; 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 PI 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.).

## Browser-Based Do Not Track

"Do Not Track" is a privacy preference that you can set in your Internet search browser that sends a signal to a website that you do not want the website operator to track certain browsing information about you. Since the Site is not configured to detect Do Not Track signals from a user's computer, we are unable to respond to Do Not Track requests; however, we do not track Site users across third party websites. To learn more about "Do Not Track," please visit <http://www.allaboutdnt.com>

## How we share and manage your data

### Sharing of Information

Pantheon will not disclose your PI except as set out in this Privacy Policy. Pantheon may disclose your 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 use service providers or vendors who collect or process information on our behalf with specific services such as user interfaces, connectors, dashboards, web hosting, communications, and other administrative tools available for use via the Services, for security and fraud protection, marketing and promotional services, data storage, etc... 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 PI 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 or Government Agencies:** We may disclose personal information as necessary to comply with federal, state, or local laws; comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities, 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 PI to professional advisors (e.g., lawyers, accountants, auditors).
- **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.
- **Legal Claims.** We may disclose your PI to third parties to investigate allegations or claims and establish, exercise or defend legal claims.

## 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.

## 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).

In addition, Pantheon complies 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 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 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. 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, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

In compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF, Pantheon 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.

For more information, please visit.

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.

### 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.

To determine the appropriate retention period for your PI, we consider various factors such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we process your PI; applicable legal requirements.

## Applicable Law

This Privacy Policy is governed by the internal substantive laws of the State of California without regard to its conflict of laws principles. Jurisdiction for any claims arising under or out of this Policy shall lie exclusively with the state and federal courts located in San Francisco, California. If any provision of this Policy is found to be invalid by a court having competent jurisdiction, the invalidity of such provision shall not affect the validity of the remaining provisions of this Policy, which shall remain in full force and effect.

## Special Topics and Additional Privacy Rights

### For California Consumers

**"Shine the Light" law (Civil Code Section § 1798.83).** This law permits users of our Site 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).

**"Eraser Law".** If you are a California resident under the age of 18 and a registered user of our Site, California law permits you to request and obtain removal of content or information you have publicly posted. You may submit your request using the contact information in this Policy. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

#### **California Consumer Privacy Act, as amended ("CCPA").**

This CCPA Section supplements and amends the information contained in the Privacy Policy with respect to California residents ("consumers" or "you") as required under the CCPA. The other provisions of the Policy continue to apply except as modified in this CCPA Section.

This CCPA Section describes our policies and practices regarding the collection, use, and disclosure of PI we collect about you, including PI we obtain when you access or use the Site or Services, or through other channels including but not limited to visiting one of our locations, phone and email conversations, attending our events, social media interactions, etc.

Please read this CCPA Section carefully before using the Site or submitting information to us. By accessing or visiting the Site, you indicate your understanding that the collection, use, and sharing of your information is subject to the terms of this CCPA Section. IF YOU DO NOT CONSENT TO THE COLLECTION, USE, AND DISCLOSURE OF YOUR PERSONAL INFORMATION AS DESCRIBED IN THIS CCPA SECTION, PLEASE DO NOT PROVIDE US WITH SUCH INFORMATION.

Any terms defined within the CCPA have the same meaning when utilized within this CCPA Section. All other terms shall have the meaning set forth in the Policy or Site Terms of Use as applicable. 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).

Unless stated otherwise in the agreement that you have entered with Pantheon, the chart below lists the categories of Personal Information that we may collect or have collected in the preceding 12 months, the purposes for collecting such personal information, and the categories of third parties to whom we may disclose or have disclosed this information in the past 12 months. We may add to the categories of PI we collect and the purpose we use PI. In that case, we will inform you by posting an updated version of this CCPA Section on the Site.

In general, we will not disclose your PI except with your consent and as described in this Privacy Policy unless otherwise permitted or required by law. To carry out the purposes described in this Privacy Policy, we may disclose your PI to your agent or representative, our subsidiaries, affiliates or business partners, non-affiliates, service providers and contractors (e.g., including without limitation for website operation or hosting, email services, security and fraud protection, marketing and promotional services, application processing, data analysis, IT services, cloud storage), to professional advisors (e.g., accountants and attorneys), and government entities. We may also disclose your personal information to third parties, as necessary, to: (1) comply with federal, state, or local laws; (2) comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities; (3) cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state, or local laws; or (4) exercise or defend legal claims. Lastly, we may disclose personal information to a third party to evaluate or conduct a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of or acquires all or part of the assets of our business.

Category	Personal Information Collected	Disclosure of Personal Information	Purpose of collection / processing
Identifiers	Real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, company name, driver's license number, or other similar identifiers	<ul style="list-style-type: none"> <li>• Credit Card Processing</li> <li>• Third party Services</li> <li>• Service Providers</li> <li>• Our affiliates, business partners, group companies</li> <li>• Potential acquirers of Pantheon's business</li> <li>• Government entities, Law Enforcement</li> <li>• Professional advisors</li> <li>• As directed by you</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>
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, employment history, 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>• Credit Card Processing</li> <li>• Third party Services</li> <li>• Service Providers</li> <li>• Our affiliates, business partners, group companies</li> <li>• Potential acquirers of Pantheon's business</li> <li>• Government entities, Law Enforcement</li> <li>• Consent</li> <li>• Professional advisors</li> <li>• As directed by you</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>• Credit Card Processing</li> <li>• Third party Services</li> <li>• Service Providers</li> <li>• Our affiliates, business partners, Group Companies</li> <li>• Potential acquirers of Pantheon's business</li> <li>• Government entities, 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>

		<ul style="list-style-type: none"> <li>• Consent</li> <li>• Professional advisors</li> <li>• As directed by you</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>• Third party Services</li> <li>• Service Providers</li> <li>• Our affiliates, business partners, Group Companies</li> <li>• Potential acquirers of Pantheon's business</li> <li>• Government entities, Law Enforcement</li> <li>• Professional advisors</li> <li>• As directed by you</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>• Third party Services</li> <li>• Service Providers</li> <li>• Our affiliates, business partners, Group Companies</li> <li>• Potential acquirers of Pantheon's business</li> <li>• Government entities, Law Enforcement</li> <li>• Professional advisors</li> <li>• As directed by you</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>

We do not collect PI 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.

**Sale or Sharing of PI.** Pantheon does not sell or share your Personal Information, as those terms are defined under the CCPA. Nor do we have actual knowledge that we have sold or shared personal information of minors under age 16. Because we do not sell or share your PI as those terms are defined in the CCPA, we do not process opt-out preference signals.

**Consumer Rights.** The CCPA provides California consumers with the following rights, subject to certain exceptions:

*Right to Request Deletion.* You have the right to request that we delete your PI from our records, subject to certain exceptions. Upon receipt of a verifiable consumer request (see below), and as required by the CCPA, we will delete and direct any service providers, contractors, and third parties to delete your PI from their records.

*Right to Know.* You have the right to request that we disclose the following to you as it relates to the 12-month period preceding CEFUCU's receipt of your verifiable consumer request (see below):

- a) The categories of PI we have collected about you.
- b) The categories of sources from which the PI was collected.
- c) The business or commercial purpose for collecting, selling, or sharing PI.

- d) The categories of PI we disclosed or sold for a business purpose.
- e) The categories of third parties we disclosed PI to, by the category of PI.
- f) The specific pieces of PI we collected about you.

*Right to Request Correction.* You have the right, subject to certain limitations, to request that we correct any inaccurate personal information we maintain about you. Upon receipt of a verifiable consumer request, and as required by the CCPA, we will take appropriate steps to respond to your request.

### **Submitting Consumer Rights Requests**

To exercise the rights described in this CCPA Section, please submit a verifiable consumer request to us by either calling us at (855) 927-9387 or visiting <https://pantheon.io/data-subject-request>.

*Verifiable Consumer Requests.* We reserve the right to only respond to verifiable consumer requests. A verifiable consumer request is one made by any individual who is:

- a) the consumer who is the subject of the request,
- b) a consumer on behalf of the consumer's minor child, or
- c) by a natural person or person registered with the California Secretary of State authorized to act on behalf of a consumer.

If we request, you must provide us with sufficient information to verify your identity and/or authority to act on behalf of a consumer. In general, we may ask you to provide identifying information that we already maintain about you or we may use a third-party verification service. In either event, we will try to avoid asking you for sensitive PI to verify your identity. We may not be able to respond to your request or provide you with PI if we cannot verify your identity or authority to make the request and confirm the PI relates to you. However, making a verifiable consumer request does not require you to create an account with us.

Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond. We will not use the PI we collect from an individual to determine a verifiable consumer request for any other purpose, except as required by law.

*Authorized Agents.* You may authorize a natural person or a business registered with the California Secretary of State to act on your behalf with respect to your rights under this CCPA Section. Unless you have provided the authorized agent with a qualifying power of attorney, you must provide your authorized agent written permission (signed by you) to act on your behalf, and we may require you to verify your identity directly with us or directly confirm with us that you provided the authorized agent permission to act on your behalf. We reserve the right to deny requests from persons or businesses claiming to be authorized agents that do not submit sufficient proof of their authorization.

**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. If you are an employee or applicant, we will not retaliate against you for exercising your rights under the CCPA.

## **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.