Atlan Privacy Notice

Last reviewed and updated: June 14, 2024

1. Introduction

This privacy notice ("**Privacy Notice**") explains how Atlan (as defined below) collects, accesses, stores, discloses, shares or otherwise uses your personal data in the course of Our business activities ("**Processing**"), including without limitation, any marketing activities. In addition, it also elaborates how you can exercise your rights under the applicable **Data Protection Laws** which for the purpose of this Privacy Notice include the laws applicable to the personal data processed under the premise of this Privacy Notice as detailed herein. Please note that this Privacy Notice may be updated from time to time as per Our business needs and to comply with applicable Data Protection Laws.

a) Who are we?

Atlan is a trading name of Atlan Pte Ltd and its affiliates - Atlan Inc. and Atlan Technologies Pvt Ltd. (hereinafter referred to as "Atlan", "We" or "Us", "Our"). We are a B2B SaaS service provider that helps businesses decode their data ("Services"). For the purposes of this Privacy Note, we shall be the data controller (or any similar term used in the applicable Data protection Laws) vis-à-vis the personal data processed by us within the scope of this Privacy Notice.

- b) Applicability- This Privacy Notice is applicable to:
 - (i) visitors of Our website,
 - (ii) any person approached by Us,
 - (iii) any person in discussions with Atlan regarding Our services,
 - (iv) any person who has asked for a demo of Atlan's services, and
 - (v) the authorized end users of our customers in receipt of our Services.

2. Contact Us

To enable you to exercise your data subject rights under the applicable Data Protection Laws and for us to keep accurate records of your personal data and your preferences, we have provided below the means and points of contact that you can use to get in touch with us.

In addition to the above, you may also reach out to the below provided points of contact if you have any questions and/or concerns about our policies and/or processing of your personal data.

a) Singapore, India and Rest of the World (except EU and UK)

Name: Anjali Sheoran Email: <u>privacy@atlan.com</u>

b) EU Representative

Under Article 27 of the GDPR, we have appointed a nominated EU Representative to act as our data protection agent for those in the European Economic Area (EEA). For inquiries or concerns related to data protection, you can contact our EU Representative at privacy@atlan.com, or use the following contact details:

Name: Adam Brogden Company name: INSTANT EU GDPR REPRESENTATIVE LTD By email: contact@gdprlocal.com By phone: +353 15 549 700 By post: Office 2, 12A Lower Main Street, Lucan Co. Dublin K78 X5P8 Ireland

c) United Kingdom

Under Article 27 of the UK Data Privacy Act, we have appointed a UK Representative to act as our data protection agent. For inquiries or concerns related to data protection, you can contact our UK Representative at privacy@atlan.com, or use the following contact details:

Name: Adam Brogden Company name: GDPR Local Ltd. By email: contact@gdprlocal.com By phone: 44 1772 217800 By post: 1st Floor Front Suite 27-29 North Street, Brighton England

3. Update your preferences with us

In addition to Section 2, you also have the following independent options to update your preferences with us:

- a) Atlan communications We provide appropriate "opt out" or "unsubscribe" links in-line our communications to you which can be used to inform us of your preferences, including if you wish for us to stop sending the communications.
- b) **Third party communications** Any third parties that you may have disclosed your information to (including third parties from whom we may collect your data as detailed in Section 5), please update your preferences with them directly.
- c) Cookie preferences Refer to Section 9 for information on how we process cookies.

4. Personal Data We Collect from You

a) When do we collect Personal Data?

We collect personal data:

- (i) when you visit our website
- (ii) when you provide it to us by any sort of communication
- (iii) through cookies See Section 9 for more questions.

b) What personal data do we collect?

The personal data we collect may include:

- (i) Identity Data includes your first name and last name;
- (ii) **Contact Data** includes your email address or telephone number(s) (work or personal as per your disclosure);
- (iii) **Technical Data** includes internet protocol (IP) address, any third-party website details from which you are accessing our website; and/or
- (iv) Employment Data includes your job title.
- (v) Engagement data it includes website behaviours (page views, time spent), social media activities (likes, shares, comments), and responses to digital communications such as email open and click-through rates

Please note that, we do not collect or process any *sensitive personal data* or any *special categories of personal data* which may include information ranging from your personal health information, political views, sexual orientation, religious or spiritual beliefs, and any personal data of similar nature and as further specifically identified as sensitive or special under applicable Data Protection Laws.

5. Personal Data We Collect from Others

Sometimes we may obtain information about you from third party sources, including but not limited to, public databases, resellers and distributors, joint marketing or business partners, sponsored events or B2B intelligence database vendors) and to the best of our knowledge as per the authorisation you have provided to such third parties.

The personal data we collect from such third parties may include:

- (i) Identity Data includes your first name and last name
- (ii) **Contact Data** includes your email address (work or personal as per your disclosure to the third party), telephone number(s)
- (iii) **Technical Data** includes page-view information or internet protocol (IP) address (where applicable)
- (iv) Employment Data includes your job title

6. How We Use Your Personal Data

We use your personal data for the following purposes/activities:

Purpose/Activity	Type of Data	Lawful basis of processing under applicable Data Protection Laws
 For internal administration such as: Verification of information human resources management financial management operations management marketing and sales management information technology management 	 Identity data Contact data 	 Consent Necessary to Enter into or Perform a Contract Legitimate Interest
Provide access to our products and/or services	Identity dataContact data	 Consent Necessary to Enter into or Perform a

		Contract
To communicate with you regarding your use of our services and Platform, and to update you on any changes in our terms and the Privacy Policy.	Identity dataContact data	 Consent Necessary to Enter into or Perform a Contract Legitimate Interest
Monitor, maintain, troubleshoot and/or improve our website, products and services and any associated features, including evaluation or devising new features	 Identity data Contact data Technical data 	 Necessary to Enter into or Perform a Contract Legitimate Interest
Detect and prevent any potentially illegal, undesirable or abusive activity	 Identity data Contact data Technical data 	 Necessary to Enter into or Perform a Contract Legitimate Interest
Analyse and measure behaviour and trends & conduct statistical analysis	 Contact data Technical data Engagement data 	• Legitimate Interest
Maintain the quality, effectiveness and standard of	Identity dataContact data	• Necessary to Enter into or Perform a

our website, products and services	• Engagement data	Contract
 Market research such as: collecting and analyzing information about a market, including its size,trends, competition, and customer needs and preferences gain insights that can help a business make informed decisions about product development, pricing, promotion, and distribution strategies Lead generation such as: gathering information about potential customers, such as their contact information and their needs and interests using that information to target marketing efforts and sales outreach 	 Identity data Contact data Engagement data Employment data 	 Consent Legitimate Interest

If you are resident in the EEA or UK, you may object to the processing of your personal data at any time where we are processing your personal data based on our legitimate interests. We need certain personal data from you to be able to provide services to you. Please refer to the attached EU and UK Addendum to refer to your rights.

7. Sharing Your Personal Data



When necessary, we share your personal data with:

- a) our group companies and/or affiliates;
- b) tax, government, and any relevant regulatory authorities as required under applicable laws; and/or
- c) other third parties as required for the purposes described herein, including:
 - (i) our services providers for IT and system administration services;
 - (ii) Processors or sub-processors that aid us in delivering the services to you, such as, our hosting services providers;
 - (iii) Professional advisors, such as but not limited to, legal attorneys, bankers, auditors, insurers that we consult with for our business purposes;
 - (iv) Vendors that help us collect information from you as described in Section 5; and
 - (v) Vendors that help us process your personal data for purposes described in Section6, such as but not limited to, market research, analytics, lead generation.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

8. Security

We use a variety of security technologies and procedures to help protect your Personal Data from unauthorized access, use or disclosure. We secure the Personal Data you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All Personal Data is protected using appropriate physical, technical and organizational measures. Further information on this may be provided on request for the purposes of performance of a contract.

9. Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.



You can *choose to accept or decline cookies*. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline *non-essential cookies* if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine and update your preferences in relation to non-essential cookies. For more information about the use of cookies please refer to our <u>Cookie policy</u>.

10. International Data Transfers

Your personal data may be transferred internationally to our third-party service providers and affiliates for the purpose of providing our Services and to fulfill Our legitimate business purposes. We require everyone we work with to keep your personal data confidential and secure under express written contracts with all necessary compliances under the Data Protection Laws duly flowed down to them.

11. Retaining and Storing Your Personal Data

Your personal data is stored by Atlan on its servers, and on the servers of the cloud-based database management services Atlan engages, typically located in the jurisdiction where the information is collected.

- We retain your personal data for as long as it is required by us for the
- (i) purposes described above,
- (ii) to meet our legal or regulatory obligations, and
- (iii) for the exercise and/or defence of any legal claims

After these needs are met, we don't store your data longer than necessary.

12. Profiling

We collect data from third-parties to build user profiles. We ensure that suitable protection is maintained at all times by ensuring that appropriate safeguards are in place.

13. Automated Decision-Making

We do not use any automated processes to make decisions about you that produce legal or significant effects concerning you.

14. Children's data

Our Services are not directed to children, as defined by applicable local law, and we do not knowingly collect personal information from children. If you learn that your child has provided us with personal information without your consent, you may reach out on the contact information provided in this policy. If we learn that we have collected any personal information in violation of applicable law, we will promptly take steps to delete such information and terminate the child's account.

15. Information we process on behalf of customers when they use our service

When we act as a data processor, we handle personal data strictly under the explicit guidance of our customers, who function as the data controllers. Our clients are responsible for complying with all relevant regulations and laws, including providing notice, disclosure, and obtaining consent before sharing personal data to use our services.

EU and UK Addendum

This addendum is a part of this Privacy Notice and is applicable to you if you are in the EEA or UK .

Your Data Subject Rights and How to Exercise Them

If you are resident in the European Union, European Economic Area or UK, then the General Data Protection Regulation (GDPR) is applicable to the personal data we collect and/or process and you can contact us or our EU or UK representative in order to exercise your rights relating to the personal data we hold about you. The contact details can be found in the Contact Us section of this notice. However, they may be subject to various exceptions and limitations.

Your rights:

Where Atlan is a data controller, the following data subject rights are available to you:

a) **Right to access** (commonly known as a "data subject access request"): You have the right to obtain confirmation if we are processing your personal data and where we are,

the right to access and know the following information:

(i) particulars of data collected and processed, including without limitation, purposes of processing, categories of data, categories of sources from which the data is collected, the business or commercial purpose for collecting and/or processing and the categories of third parties to whom we disclose personal information.

(ii) copies of the information we hold about you at any time, or

(iii) that we modify, update or delete.

- b) **Right to rectification:** If you believe that we hold inaccurate or incomplete personal data, you have the right to have the data rectified.
- c) **Right to erasure or be forgotten**: You may ask us to delete your personal data at any time after collection or processing for rightful reasons.
- d) **Right to restrict processing of your personal data**: You may ask us to stop or limit processing of your personal data. We will still hold the data but will not process it any further.
- e) **Right to data portability:** You may request your personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, if the processing is by automated means, and if the processing is based on the fulfilment of a contractual obligation.
- f) **Right to object:** You have the right to object to our processing of your personal data where:
 - (i) processing is based on legitimate interest
 - (ii) processing is for the purpose of direct marketing
- g) **Right to Withdraw Consent**: You may withdraw consent at any time if we are relying on your consent to process your personal data. This won't affect any processing already carried out before you withdraw your consent or processing under other grounds.

Denial or Inability to comply with any data subject requests

Please note that we may not always be able to comply with your requests as per your data subject rights in case, we need to retain it for legitimate reasons as per applicable laws, such as but not limited to, providing our Services, compliance with our legal obligations or exercising or defence of legal claims. However, please be rest assured that in case we are unable to comply with your data subject requests, we will inform you of the same in writing within a reasonable time or as required under applicable laws, whichever is earlier. You may appeal our decision via a complaint as detailed in the section below.

Making a Data Protection Complaint

If you have any concerns about the use of your personal data or the way we handle your requests relating to your rights, you can raise a complaint directly with us by using the contact details provided in this notice. We aim to process data protection requests within 30



days, SAR responses are usually free, but we reserve the right to charge for excessive or unfounded requests. Please note when you request to exercise any of your rights, we may request specific information from you to help us confirm your identity and keep your personal data protected.

We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the supervisory authority in the member state where you reside.

You can find the list at: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

EU-US Data Privacy Framework Addendum

Atlan complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) as set forth by the U.S. Department of Commerce. Atlan 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.

If there is any conflict between the terms in this privacy notice and the EU-U.S. DPF Principles, the EU-U.S. DPF Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <u>https://www.dataprivacyframework.gov/</u>

In compliance with the EU-U.S. DPF:

- 1. Atlan commits to cooperate and comply with the advice of the panel established by the EU data protection authorities (DPAs) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF; and
- Atlan also commits to resolve EU-U.S. DPF Principles-related complaints about our collection and use of your personal information. EU individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF may first contact Atlan's EU Representative at the contact details shared above in section 2 of this Privacy Notice.
- 3. Atlan is subject to the investigatory and enforcement powers of the US Federal Trade Commission. You may also refer a complaint to your local data protection authority and we will work with them to resolve your concern.

- 4. In certain circumstances, the DPF provides the right to invoke binding arbitration to resolve complaints not resolved by other means, as described in Annex I to the DPF Principles.
- 5. In the context of an onward transfer, Atlan 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. Atlan will remain liable under the DPF Principles if our agent processes your Personal Data in a manner inconsistent with the DPF Principles, unless Atlan is not responsible for the event giving rise to the damage.
