



Atlan Privacy Notice

Last reviewed and updated: April 16, 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 authorised end users of our customers in receipt of our Services.

2. Contact Us

a. Rest of the World excluding EU, UK, India and Singapore

If you have any questions about:

- (i) this Privacy Notice
- (ii) the Processing of your personal data
- (iii) or exercising your privacy rights

please contact us at privacy@atlan.com

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

d. India

If You find any discrepancies or have any grievances in relation to the collection, storage, use, disclosure, and transfer of Your Personal Information under this Privacy Notice, please contact our appointed Grievance Officer using the following details:

Name: Anjali Sheoran

Email: privacy@atlan.com

e. Singapore

If You find any discrepancies or have any grievances in relation to the collection, storage, use, disclosure, and transfer of Your Personal Information under this Privacy Notice, please contact our appointed Data Protection Officer using the following details:

Name: Anjali Sheoran

Email: privacy@atlan.com

3. 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- the details of which are covered in greater detail in our [cookie policy](#) as published on our website.

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 (work or personal as per your disclosure to the third party), telephone number(s);
- (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 job title.
- (v) **Engagement data** it includes website behaviors (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, such as and without limitation, the *Information Technology (Reasonable Security Practices and Procedures and Sensitive Personal Data or Information) Rules 2011* and the *Information Technology Act, 2000*.

4. Personal Data We Collect from Others

Sometimes we work with carefully selected third parties and we may receive your personal data from them and to the best of our knowledge as per the authorisation you have provided to such third parties.

The third parties include:

- (i) Social networks such as LinkedIn and Meta
- (ii) Search engines such as Google
- (iii) Advertisers
- (iv) Vendors

The personal data we process are:

- (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 internet protocol (IP) address
- (iv) **Employment Data** includes job title

It is important that the data we hold about you is accurate and up to date. Please keep us informed of any changes to your personal data for example change of contact details, etc. by using any of the means of contact detailed in Section 2 above.

5. 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
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		under applicable Data Protection Laws
<p>For internal administration such as:</p> <ul style="list-style-type: none"> • Verification of information • human resources management • financial management • operations management • marketing and sales management • information technology management 	<ul style="list-style-type: none"> • Identity data • Contact data 	<ul style="list-style-type: none"> • Consent • Necessary to Enter into or Perform a Contract • Legitimate Interest
<p>Provide access to our products and/or services</p>	<ul style="list-style-type: none"> • Identity data • Contact data 	<ul style="list-style-type: none"> • Consent • Necessary to Enter into or Perform a Contract
<p>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.</p>	<ul style="list-style-type: none"> • Identity data • Contact data 	<ul style="list-style-type: none"> • Consent • Necessary to Enter into or Perform a Contract • Legitimate Interest
<p>Monitor, maintain, troubleshoot and/or improve our website, products and services and any associated features, including evaluation or devising new features</p>	<ul style="list-style-type: none"> • Identity data • Contact data • Technical data 	<ul style="list-style-type: none"> • Necessary to Enter into or Perform a Contract • Legitimate Interest
<p>Detect and prevent any potentially illegal, undesirable or abusive activity</p>	<ul style="list-style-type: none"> • Identity data • Contact data • Technical data 	<ul style="list-style-type: none"> • Necessary to Enter into or Perform a Contract • Legitimate Interest
<p>Analyse and measure behaviour and trends & conduct statistical analysis</p>	<ul style="list-style-type: none"> • Contact data • Technical data • Engagement data 	<ul style="list-style-type: none"> • Legitimate Interest

<p>Maintain the quality, effectiveness and standard of our website, products and services</p>	<ul style="list-style-type: none"> ● Identity data ● Contact data ● Engagement data 	<ul style="list-style-type: none"> ● Necessary to Enter into or Perform a Contract
<p>Market research such as:</p> <ul style="list-style-type: none"> ● 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 <p>Lead generation such as:</p> <ul style="list-style-type: none"> ● 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 	<ul style="list-style-type: none"> ● Identity data ● Contact data ● Engagement data ● Employment data 	<ul style="list-style-type: none"> ● 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.

6. Sharing Your Personal Data

When necessary, we share your personal data with:

- (i) our group companies and/or affiliates;
- (ii) tax, government, and any relevant regulatory authorities;
- (iii) prosecuting authorities and courts, and/or other relevant third parties connected with legal proceedings or claims;
- (iv) law enforcement agencies; and/or
- (v) third parties where we are required to do so by law.

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.

7. 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.

8. 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 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. For more information about the use of cookies please refer to our [Cookie policy](#).

9. 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 fulfil 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.

10. 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..

11. 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.

12. Automated Decision-Making

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

13. 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.

14. 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
