

Treasure Data's Privacy Policy
applicable to personal data covered under
Treasure Data's Data Privacy Framework self-certification

Effective as of October 13, 2023

In processing the Personal Data described below, Treasure Data, Inc. (“**Treasure Data**”) 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. Treasure Data 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. Treasure Data 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/s/>

Types of Personal Data. Treasure Data provides to its enterprise customers (“**Customers**”) a cloud-based service for data hosting and analysis (“**Customer Data Platform**” or “**CDP**”). Customers decide what information to upload into their CDP accounts and this information may include personal data (“**Personal Data**”), which is typically related to their clients, prospects and visitors of their web properties, such as names, contact information and purchase history.

Purpose of processing of the Personal Data. Treasure Data processes the Personal Data submitted by Customers for the purpose of providing its cloud-based CDP service and ancillary services (such as customer support and professional services) to Customers. To this end, Treasure Data hosts the Personal Data and processes it according to the instructions of the relevant Customer who submitted that data and as permitted under the contract in place between Treasure Data and that Customer. For example, Treasure Data may access Personal Data to resolve a technical problem or to respond to a request for customer support from a Customer.

Type of third parties to which Personal Data is disclosed; purpose of disclosure; liability for onward transfers. Treasure Data uses its subsidiaries and a limited number of third-party service providers to assist in providing its services to Customers. Treasure Data's subsidiaries engage personnel that performs technical operations, provide customer support or account management services. The third-party vendors provide a range of services functional to the delivery of Treasure Data's services to Customers, such as infrastructure, data analytics, engineering services and communication tools that Customers may use to seek customer support from Treasure Data. These subsidiaries and third-party vendors may access, host or otherwise process Personal Data in connection with providing their services to Treasure Data. Treasure Data has agreements in place with them restricting their access, use and processing of Personal Data in compliance with Treasure Data's obligations under the Data Privacy

Framework. Treasure Data remains liable if any of these subsidiaries or third-party service providers processes such Personal Data in a manner inconsistent with those obligations and Treasure Data is responsible for the event giving rise to the damage.

Individuals' rights to access their Personal Data; limitations to its use and disclosure.

Subject to applicable law, EU and UK and Swiss individuals have the right to access personal data about them that an organization holds and to request it to be corrected, amended or deleted, and to limit its use and disclosure. Treasure Data processes Personal Data on Customers' instructions. Customers have access to the data that they have submitted to Treasure Data's CDP and can view, extract a copy of, update and delete the data maintained in their CDP accounts. Customers may also export this data to themselves or to third-party platforms they designate. Customers requiring any assistance can contact Treasure Data's technical support. If you wish to request access, to limit use, or to limit disclosure of your Personal Data, please provide to Treasure Data the name of the Customer who submitted your Personal Data to Treasure Data's CDP. We will refer your request to that Customer and will support them as needed in responding to your request.

Inquiries and complaints: In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Treasure Data commits to resolve DPF Principles-related complaints about our collection and use of your Personal Data. EU and UK and Swiss individuals with inquiries or complaints regarding our handling of Personal Data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF should first contact Treasure Data or its subsidiary Treasure Data (UK) Limited (a company registered in the United Kingdom) at: privacy@treasure-data.com We will respond within 45 days.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Treasure Data commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to TRUSTe, an alternative dispute resolution provider based in 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.

If neither Treasure Data nor our dispute resolution provider resolves your complaint, you may have the possibility, under certain conditions, to engage in binding arbitration through the Data Privacy Framework Panel. For more information on this option, please see [Annex I](#) of the EU-U.S. Data Privacy Framework Principles.

U.S. Federal Trade Commission enforcement: The Federal Trade Commission has jurisdiction over Treasure Data's compliance with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

Compelled disclosure: Treasure Data may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Amendments. This privacy policy may be amended from time to time consistent with the requirements of the Data Privacy Framework. We will post any revised version of this policy on this website.