

# Privacy Notice

Last updated: February 20, 2024

Fivetran Inc. ("**Fivetran**") respects your right to privacy. This Privacy Notice explains who we are, how we collect, store, share and use personal data about you, and how you can exercise your privacy rights. This Privacy Notice applies to personal data that we collect, including through our website at [www.fivetran.com](http://www.fivetran.com), within our product(s) and on other websites that Fivetran operates and that link to this policy ("collectively **Websites**").

If you have any questions or concerns about our use of your personal data, then please contact us using the contact details provided at the bottom of this Privacy Notice.

## What personal data does Fivetran collect and why?

### Broad Categories of personal data collected:

Broad Categories Collected	Examples
Identifiers	Name, contact information, and other personal data that can directly or indirectly identify a consumer
Select Information in Customer Records	Name, contact information, company information
Commercial Purchasing Information	Records of products and services purchased
Internet or Network Activity	Browsing history, search history, information regarding a consumer's interaction with an Internet Web-site, application, or advertisement.
Information Typically Detected by Senses	Audio information (call recordings)
Employment Information	Role, title, and other relevant employer information
Inferences Drawn from other Personal Data	Buying intent, and other relevant information to market or provide the services

The personal data that we may collect about you broadly falls into the following categories of sources:

- *Information that you provide voluntarily*

Certain parts of our Websites may ask you to provide personal data voluntarily: for example, we may ask you to provide your contact details in order to register an account with us, for technical support, to subscribe to marketing communications from us, to register for an event, to access content, and/or to submit inquiries to us. The personal data that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal data.

- *Information that we collect automatically*

When you visit our Websites, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal data under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Websites, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Websites, where they come from, and what content on our Websites is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Websites to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology" below.

- *Information that we obtain from third party sources*

From time to time, we may receive personal data about you from third-party sources (including, but not limited to, lead generation providers, partners, content syndication providers, third-party enrichment tools, and meeting maker vendors), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal data to us.

The types of information we collect from third parties include name, contact information, title and/or role within your organization, internet activity, company data, and we use the information we receive from these third parties to market our services to you.

### **Sensitive Personal Data**

We may collect sensitive personal data, or special category personal data, from customers as a part of providing our services. We do not use sensitive personal data for any other commercial purpose, we do not sell sensitive personal data, and do not share sensitive personal data for online advertising.

## **Who does Fivetran share my personal data with?**

We may disclose your personal data to the following categories of recipients:

- to our **group companies and third-party services providers** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Websites), or who otherwise process

personal data for purposes that are described in this Privacy Notice or notified to you when we collect your personal data. A list of our current subprocessors is available here <https://fivetran.com/docs/security/subprocessors>;

- to our **partners**, who we may share with in connection with selling or distributing our products and services, or engaging in joint marketing activities, in accordance with your expressed marketing preferences. Sharing excludes text messaging originator opt-in data and consent; this information will not be shared with any third parties. Fivetran will not share data from Google APIs with third party tools, such as AI models.
- to any **competent law enforcement body, regulator, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an actual or **potential buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Privacy Notice;
- to any **other person with your consent** to the disclosure.

**Third parties we share with for a business purpose (in the last 12 months):**

Broad Categories Collected	Types of third parties we share with
Identifiers	Group companies, service providers, and partners
Select Information in Customer Records	Group companies, service providers, and partners
Commercial Purchasing Information	Group companies, service providers, and partners
Internet or Network Activity	Group companies, service providers, and partners
Information Typically Detected by Senses	Group companies, service providers, and partners
Employment Information	Group companies, service providers, and partners
Inferences Drawn from other Personal Data	Group companies, service providers, and partners

**Third parties we share with for a commercial purpose (including sale/online advertising in the past 12 months):**

Broad Categories Collected	Types of third parties we share with
Identifiers	Group companies, partners, and any other person with your consent
Select Information in Customer Records	Group companies, partners, and any other person with your consent
Commercial Purchasing Information	Group companies, partners, and any other person with your consent
Internet or Network Activity	Group companies, partners, and any other person with your consent
Information Typically Detected by Senses	Group companies, partners, and any other person with your consent

Employment Information	Group companies, partners, and any other person with your consent
Inferences Drawn from other Personal Data	Group companies, partners, and any other person with your consent

Fivetran has no actual knowledge that it sells or shares the personal information of individuals under 16 years of age.

## Legal basis for processing personal data

Our legal basis for collecting and using the personal data described above will depend on the personal data concerned and the specific context in which we collect it.

However, we will normally collect personal data from you only (i) where we need the personal data to perform a contract with you, (ii) where the processing is in our legitimate interests and not overridden by your rights, or (iii) where we have your consent to do so. In some cases, we may also have a legal obligation to collect personal data from you or may otherwise need the personal data to protect your vital interests or those of another person.

If we ask you to provide personal data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal data is mandatory or not (as well as of the possible consequences if you do not provide your personal data).

If we collect and use your personal data in reliance on our legitimate interests (or those of any third party), this will normally be to operate our platform and to communicate with you as necessary – for example, when responding to your queries, analyzing use of and improving our platform, undertaking marketing activities for existing customers as legally permitted, and detecting or preventing illegal activities. We may have other legitimate interests and we will make clear to you at the relevant time what those legitimate interests are. We rely on these legal bases to process data for the following purposes: to help provide the services (e.g. customer support and usage data) and to market our services to you as legally permitted.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal data, please contact us using the contact details provided under the “How to contact us” heading at the bottom of this notice.

## Cookies and similar tracking technology

### What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Website owners can use cookies for a variety of reasons that can include enabling their websites to work (or work more efficiently), providing personalized content and advertising, and creating website analytics.

Cookies set by the website owner (in this case, Fivetran) are called “first-party cookies”. Only the website owner can access the first-party cookies it sets. Cookies set by parties other than the website owner are called “third-party cookies.” Third-party cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and social sharing). The parties that set these third-party cookies can recognize your device both when it visits the website in question and also when it visits other websites that have partnered with them.

Fivetran may use web beacons, tags, flash cookies, HTML5, and scripts (“**Data Tools**”) in the Websites or in emails to help deliver

cookies, count visits, understand usage and campaign effectiveness, and determine whether an email has been opened and acted upon. Fivetran may receive reports based on the use of these technologies by our service/analytics providers on an individual and aggregated basis.

If you want to learn more about cookies, or how to control, disable or delete them, please visit <http://www.allaboutcookies.org> for detailed guidance. For further information on how to manage Flash cookies, please click [here](#).

### **Why do we use cookies?**

We use first-party and third-party cookies for several reasons. Some cookies are required for technical reasons that are strictly necessary for our Websites to operate, and we refer to these as "essential" cookies. Other cookies also enable us to provide website functionality, or to enhance visitors' experience on our Websites by providing them with personalized content and advertising. This is described in more detail below.

Cookies collect certain standard information that your browser sends to the Websites such as your browser type and language, access times, and the address of the website from which you arrived at a Website. They may also collect information about your Internet Protocol (IP) address, clickstream behavior (i.e. the pages you view, the links you click, and other actions you take when you use the Websites) and product information. These are called first-party cookies and they are essential to the Websites' operation.

Fivetran may also contract with third-party advertising networks that collect non-personally identifiable information and personal data through the Websites, emails, and on third-party web-sites. Ad networks follow your online activities over time by collecting usage data through Data Tools. They use this information to provide advertisements about products and services tailored to your interests. You may see these advertisements on other websites. This process also helps us manage and track the effectiveness of Fivetran's marketing efforts.

The Websites may include third-party social media features, such as the Facebook Like button, and third-party widgets, such as the 'Share This' button or interactive mini-programs that run on the Websites. These features may collect your IP address, which page you are visiting on the Websites, and set a cookie to enable the feature to function properly. Your interaction with these features is governed by the privacy policy of the third-party company providing it.

We use third-party advertising companies to display ads on the Websites tailored to your individual interests based on your internet activity, as well as to provide advertising-related services such as ad delivery, reporting, attribution, analytics, and market research. You can manage your preferences with regards to the receipt of tailored advertisements in the cookie settings described below. Please note if these cookies are switched off, you will continue to see advertisements, but they will no longer be tailored to your interests.

The specific types of first-party and third-party cookies served through our Websites and the purposes they perform are described in our [cookie settings page](#).

### **What about other tracking technologies, like web beacons?**

Cookies are not the only way to recognize or track visitors to a website. We may use other, similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Websites or opened an email that we have sent them. This allows us, for example, to monitor the traffic patterns of users from one page within our Websites to another, to deliver or communicate with cookies, to understand whether you have come to our Websites from an online advertisement displayed on a third-party website, to improve site performance, and to measure the success of email marketing campaigns. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will often impair their functionality.

### **How can you control cookies?**

You have the right to decide whether to accept or reject cookies. You can exercise your cookie preferences in our [cookie settings page](#). Our cookie consent tool automatically honors Global Privacy Control ("GPC") and Do Not Track ("DNT") signals.

You can also set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our Websites though your access to some functionality and areas of our Websites may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser to browser, you should visit your browser's help menu for more

information.

In addition, most advertising networks offer you a way to opt out of targeted advertising. If you would like to find out more information, please visit <http://www.aboutads.info/choices/> or <http://www.youronlinechoices.com>, or <http://www.youronlinechoices.eu/> if located in the European Union.

## How does Fivetran keep my personal data secure?

We use appropriate technical and organizational measures to protect the personal data that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal data. Fivetran is hosted on leading cloud service providers (linked on our security page at <https://fivetran.com/docs/security#physicalandenvironmentalsafeguards>) and uses industry-standard security protocols to protect personal data. Personal data is stored on private servers in a protected security group. All connections between the end user and our servers are encrypted with SSL, and server software is kept continuously up to date with the latest security patches.

## International data transfers

Your personal data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different than the laws of your country.

To view our data residency locations, view our data residency policy here at <https://fivetran.com/docs/security#fivetrandataresidency>. Our group companies, third party service providers, and partners operate around the world.

However, we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this Privacy Notice. These include complying with the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework, and implementing applicable standard contractual clauses for transfers of personal data between our group companies, which require all group companies to protect personal data they process in accordance with applicable data protection law.

Our Data Protection Addendum is available online at <https://www.fivetran.com/legal/data-processing-addendum>, and our Standard Contractual Clauses, when applicable, can be provided on request by contacting us at [privacy@Fivetran.com](mailto:privacy@Fivetran.com). We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

## Data retention

We retain personal data we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a 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 data, we will either delete or anonymize it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible. For more detailed information on our retention practices, see <https://fivetran.com/docs/trust/privacy#retentionofcustomerdata>.

# Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal data, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading at the bottom of this notice.
- In addition, you can **object to processing** of your personal data, ask us to **restrict processing** of your personal data or **request portability** of your personal data. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading at the bottom of this notice.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading at the bottom of this notice.
- Similarly, if we have collected and processed your personal data with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- You have the **right to opt out of the sale of your personal data, including sharing personal data for online advertising**. For more information, visit our [cookie settings page](#). Our cookie consent tool automatically honors GPC and DNT signals.
- **We do not use or disclose your sensitive personal data**, except for the purposes of providing the services to our customers.
- You have the **right to non-discrimination**, meaning we may not discriminate against a data subject for exercising a privacy right.
- You have the **right to have your authorized agent** make a data privacy request on your behalf. For more information, please contact us using the contact details provided under the “How to contact us” heading at the bottom of this notice.
- You have the **right to complain to a data protection authority** about our collection and use of your personal data. For more information, please contact your local data protection authority.
- If you are not satisfied with our response regarding your data privacy request, you have the **right to appeal** our decision. For more information, please contact us using the contact details provided under the “How to contact us” heading at the bottom of this notice. If you are not satisfied with the result of the appeal, you have the **right to contact your respective attorney general** depending on where you reside.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Our process for verifying data protection requests is based on matching personal data provided by the requestor in their data protection request with personal data that we have on file with the requestor. The personal data points matched vary based on what Fivetran has on the requestor, but Fivetran uses multiple personal data points for verification. During the verification process, Fivetran aims to avoid collecting additional personal data from the requestor that has not been previously collected by Fivetran.

## EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework

Fivetran Inc. complies 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**”) as set forth by the U.S. Department of Commerce. Fivetran Inc. 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 and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Fivetran Inc. 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 (“collectively the **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 and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Fivetran Inc. 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 JAMS, 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://www.jamsadr.com/eu-us-data-privacy-framework> for more information or to file a complaint. The services of JAMS are provided at no cost to you. You also have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding our DPF compliance not resolved by any of the other DPF mechanisms. Please view the following for additional information on this process and the applicable requirements:

<https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf?tabset-35584=2>

Fivetran’s accountability for personal data that it receives under the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF and subsequently transfers to a third party is described in the Principles. In particular, Fivetran remains responsible and liable under the Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless Fivetran proves that it is not responsible for the event giving rise to the damage. The Federal Trade Commission has investigation and enforcement authority over Fivetran’s compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF.

## Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

## How to contact us

If you have any questions or concerns about our use of your personal data, please contact us at [privacy@fivetran.com](mailto:privacy@fivetran.com) (we operate online), or at the following address:

Fivetran Inc., Attn: Data Protection Officer,

1221 Broadway, Suite 2400, Oakland, CA 94612, United States

We have a Data Protection Officer responsible for compliance with data protection law. Their contact details are [DPO@fivetran.com](mailto:DPO@fivetran.com).

The data controller of your personal data is Fivetran Inc. when we collect information from you for marketing purposes. Our customers are the data controller for personal data they provide to us when they use our services.