

Pluralsight Privacy Notice

Effective Date: May 1, 2023 (v. 6.0)

Introduction

This Privacy Notice ("Privacy Notice") applies to Pluralsight's website accessible at <https://www.pluralsight.com> ("Website") and the cloud-based technology learning platform also accessible through that Website, the video players used to view Pluralsight courses, and the mobile applications made accessible by Pluralsight ("Platform"), and together with the Website, (collectively, the "Site"), all owned and operated by Pluralsight, LLC, a Nevada limited liability company ("Pluralsight," "we," or "us"). Capitalized terms that are not defined in this Privacy Notice shall have the meanings ascribed thereto in the Enterprise of Individual Terms of Use. This Privacy Notice describes how Pluralsight collects and uses personal data collected through the Site. It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal data.

1. Personal Data We Collect

Pluralsight collects personal data from you, through our interactions with you and through our Site. You provide some of this data directly, and we get some of it by collecting data about your interactions, use, and experiences with our Site. The data we collect depends on the context of your interactions with us and the choices you make, including your privacy settings and the services and features you use. We also obtain data about you from third parties.

You have choices when it comes to the technology you use and the data you share. When we ask you to provide personal data, you may decline under certain circumstances. Many of our Services (as defined in the Enterprise and Individual Terms of Use) require some personal data to provide you with that service. If you choose not to provide data required to provide you with a service or particular feature, you cannot use that service or feature. Where providing the data is optional, and you choose not to share personal data, features like personalization that use such data will not work for you.

- Personal data you provide to us: This is personal data about you that you give us directly when you interact with us. You may give it to us by filling out a form on our Site, by corresponding with us by phone, e-mail, or at an in-person event, or through interactions in a Pluralsight-sponsored forum. It includes contact information, such as your name, email address, company, telephone number, country, occupation, and information related to your

inquiries and requests. We strictly prohibit you from providing any sensitive personal data to us.

- Personal data also includes information necessary to register or pay for a subscription or event, to complete your profile, or to place an order for other services we provide. It also includes information shared when you participate in a discussion board, share on social media via our Site, enter a competition or promotion, submit a query, report feedback about or a problem within our Site, or engage with any of the other Services. When you create an account for our Platform, we require you to provide your first name, last name, and email address.

Payment Processing: When you purchase a subscription, you will need to provide payment and billing information, often including an address and credit card information. Such payment details you provide in the designated checkout page on our Site will be encrypted using the Transport Layer Security (TLS) protocol before they are submitted to us over the internet. Such data is then transmitted directly to our third-party payment and subscription processors and is not within Pluralsight's control. In such cases, this Privacy Notice will not apply and the use and privacy terms of the third-party payment and subscription processors will apply.

- Personal data we collect about you from your use of our Site: We will automatically collect information from you each time you visit our Site whether or not you enter the Site as a registered user. This includes technical information, information about your visit, and information about your activity on our Site such as courses searched and viewed, page response times, download errors, length of visit to certain pages, page interaction information (such as scrolling, clicks, and mouseovers), methods to browse to and away from a page, and methods used to contact our sales and support teams. Technical information may also include the internet protocol (IP) address used to connect your device to the internet, unique device identifiers, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating systems, and device platform.
- Personal data processed through social media platform plugins embedded in Pluralsight's website: We process your personal data through Pluralsight's Facebook Fan Page and social media plugins embedded in our Website. Pluralsight and Facebook are joint-controllers regarding insight data (e.g., data relating to how often you visit the Pluralsight Facebook Fan Page, whether you recommend the Pluralsight Facebook Fan Page, etc.) ("Insight Data"). However, Pluralsight and Facebook have agreed that Facebook Ireland takes primary responsibility under the GDPR for the processing of Insight Data. This means that Facebook is primarily responsible for providing you with information about the joint processing of Insight Data

and for enabling you to exercise your rights under the GDPR regarding Insight Data.

- Personal data we receive from other sources: This is information we receive about you from third parties that we work closely with to provide, promote, and improve our services. These third parties include business partners, vendors who assist in technical and payment services, advertising networks, analytics providers, and search information providers.

2. How We Use Your Personal Data

Pluralsight uses the personal data you provide in a manner that is consistent with this Privacy Notice as follows:

- Provision of Services: We use your personal data to provide you with our services through our Site on the basis that this processing activity is necessary for the performance of a contract between you and us. The services may include providing access to our course library, administration of your account, billing, and notifying you of changes to our service or your account. This personal data will also be used to allow you to participate in the interactive features of our Site, or to provide you with information you may have requested from us, including but not limited to access to whitepapers and webinars.
- Improvement of Services and Features: We use your personal data to continually improve our Site, including by way of the addition of new content, features, or capabilities. We process your personal data on the basis that it is necessary for the purpose of our legitimate interests to provide you with improved services.
- Personalization: We use your personal data to enhance the user experience based on prior interactions with our Site, to the extent that you have provided your consent.
- Account Activation and Maintenance: Data such as device, network, and subscription identifiers are used to activate and maintain user accounts. We process your personal data on the basis that it is necessary for the performance of a contract between you and us.
- Support: We use your personal data to respond to your requests for assistance including password resets and general troubleshooting. We process your personal data on the basis that it is necessary for the performance of a contract between you and us.
- Social Media Analytics: We use your personal data to benefit from social media-related analytics, based on our legitimate interests to develop commercial activities and improve our products and services.

- Safety and Security: We use your personal data to protect the safety and security of our users and our Site. This includes using data to detect malware and malicious activities, and to monitor for violations of our terms of use. We process your personal data on the basis that it is necessary for the purpose of our legitimate interests to ensure the security and safety of Pluralsight.
- Communications: We will use your personal data to communicate with you regarding your account and your use of our Site. We process your personal data on the basis that it is necessary for the performance of a contract between you and us.
- Marketing: We will use your personal data to provide you with information about our services that may interest you and enhance your interaction with our Site, to the extent that you have provided your consent. We will communicate with you about these goods and services via email, direct mail, telephone, or through our Site. These communications may include newsletters, promotional emails, or offers to participate in market research requests. We will use your information for this purpose only where you have given your consent to receive such marketing material from us before we collect your information, or where you have otherwise consented to receive such marketing material including by way of your selection of marketing preferences in your individual profile, and in accordance with local law.
- Prize Promotions and Events: We will use your data to administer prize promotions and events where you have consented to participate. For example, we may provide your contact information to a third party that would issue a gift card or other prize.
- Reporting and Business Operations: We will use your personal data to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical survey purposes, and reporting on our performance on the basis of our legitimate interests to run our business smoothly and improve our services (where we have considered that such interests do not override your individual rights). We will also use this data for measuring the effectiveness of how we present content and for assessing the effectiveness of content. We use internet protocol (IP) addresses and non-personally identifiable information in our log files to analyze trends, to administer our Site, to track users' movements in and around our Site, and to gather demographic information about our user base as a whole on the basis of our legitimate interests to run our business smoothly and improve our services. We also utilize unstructured machine learning technologies to understand user behaviors in order to provide user-specific recommendations and other personalization of our Site experience on the basis of our legitimate interests to run our business smoothly and improve our services.

- Legal Compliance: We process personal data to comply with a legal obligation. For example, we may process your personal data to report any prizes or awards to an applicable taxing authority.

3. Reasons We Share Personal Data

We will ensure that we only disclose that personal data that is relevant for the purposes for which it is to be used. Furthermore, we will not process your personal data in a way that is incompatible with these purposes.

- Use of Personal Data by Pluralsight Affiliates: Pluralsight affiliates will process your personal data in order to provide you with support and other services. **Pluralsight's affiliates** can be found on our Website.
- Engagement with Pluralsight Suppliers: We sometimes retain third parties to perform certain business-related functions such as sending email on our behalf, payment processing, or conducting market research. We also share your email address with third parties such as Facebook, LinkedIn, and Twitter in order to provide custom marketing materials for you on their platforms. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function. These third parties are not permitted to use your personal data that we share with them for any purpose other than as required for them to provide services to us. **Pluralsight's sub-processors** can be found on our Website.
- Engagement With Technology Vendors: We also share user engagement information with third parties derived from our Platform. For example, when you view a course related to a specific technology vendor, we share information such as the number of course minutes viewed, Role and Skill IQ levels, hands-on course engagement, and other related data with that technology vendor. We share this information and receive feedback from those third parties in order to improve the content available on our platform and better collaborate with our partners to jointly help companies and individuals address their skill development needs. Unless we specifically ask for and you grant consent, the data we provide to technology vendors does not include personal data.
- Business Plans and Company Partnership Subscriptions: If your subscription was provided by your employer or group sponsor, any information you provide, or information otherwise collected through your registration and use of our services, including course viewing history, course viewing time, course or assessment completion, course quality ratings and feedback, certifications, performance-related metrics, and other personal data belongs to your employer or group sponsor. Your employer or group sponsor controls and administers your Pluralsight subscription. Please Note: In the event that you lose access to your employer or group sponsored

account, you will no longer be able to access the services or the data associated with your account, including any data that you may have acquired through your individual user account if you registered or signed in using your employer or group sponsored account or email address. However, if your employer or group sponsor explicitly requests that we transfer your data to your personal account, we may be able to facilitate this transfer. Please note that this transfer is subject to our policies and procedures, and may not always be possible depending on the specific circumstances.

- Corporate Mergers and Acquisition Activity: In the event that Pluralsight or its affiliates acquires or is acquired by another business operation, or in the event of a reorganization, merger, or other similar event, your personal data will be shared with the acquiring, acquired, or resulting entities and their affiliates including for the purposes of operating and managing your account as well as for providing you with additional products and services offered by the acquiring, acquired, or resulting entities.
- Legal Requirements: In certain situations, Pluralsight may be obligated to disclose personal data in response to lawful requests by governmental agencies and supervisory authorities, including to meet security or law enforcement requirements. We reserve the right to disclose your personal data as required by applicable law and when we believe that disclosure is necessary to protect our rights or to comply with a judicial proceeding, court order, or similar legal process served on us or our Site. However, Pluralsight values users' rights to due process and transparency, and therefore does not provide governments with direct or unrestricted access to user data. Our Privacy and Risk team reviews every request we receive to determine the validity of the legal process, assess the proportionality of the request, and ensure compliance with international data protection commitments made by Pluralsight. We take the responsibility to safeguard user data seriously, and strive to balance the need to comply with legal obligations with our commitment to protecting user privacy and security.

4. How to Access and Control Your Personal Data

You can also make choices about the collection and use of your data by Pluralsight. You can control your personal data that we have obtained, and exercise your data protection rights by contacting us or using features we provide. In some cases, your ability to access or control your personal data will be limited, as required or permitted by applicable law or your employer or group sponsor (where applicable).

Control the use of your data for interest-based advertising via the following:

- Select what types of marketing communications you wish to receive in the Communication Preferences section of your profile;
- Utilize the "Unsubscribe" link found in the emails we may send to you; or

- Contact us at support@pluralsight.com. Before helping you with your inquiry, we may ask to verify your identity or the identity of your authorized agent.

Not all personal data processed by Pluralsight can be accessed or controlled via the methods above. Please note that you will not be able to opt-out from our communications that are related to the ongoing service and support of your account. Such communications shall not be considered marketing communications. Additionally, any personal data that you provide to third parties directly, such as our third party payment and subscription providers, can only be controlled directly by contacting such parties.

5. Cookies and Similar Technologies

Pluralsight and its affiliates use cookies or similar technologies to collect and store certain information. These typically involve pieces of information or code that a website transfers to or accesses from your computer hard drive or mobile device to store and sometimes track information about you. Cookies allow us to create a unique device ID, enable you to be remembered when using that computer or device to interact with websites and online services, and can be used to manage a range of features and content, including storing searches and presenting personalized content. The Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a feature rich and personalized user experience when you interact with our Site and also allows us to improve our Site.

Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. We provide you with information about how to disable cookies in the table below. However, you may not be able to take full advantage of our Site if you do so.

A number of cookies we use last only while you are on our Site and expire when you close your browser or exit our Site. Others are used to remember you when you return to our Site and will remain for a longer period of time.

We use the following types of cookies:

- **Essential.** These are cookies that are required for the operation of our website and under our terms with you. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart, or make use of e-billing services.
- **Performative.** These cookies allow us to recognize and count the number of visitors and to see how visitors move around our website when they are using it. This helps us for our legitimate interests of improving the way our website works, for example, by ensuring that users are finding what they are looking for easily.

- Analytics. These are used to recognize you when you return to our website. This enables us, subject to your choices and preferences, to personalize our content, greet you by name, and remember your preferences (for example, your choice of language or region).
- Advertising. These cookies record your visit to our website, the pages you have visited, and the links you have followed. We will use this information subject to your choices and preferences to make our Site and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

We may also work with advertising networks that gather information about the content on our Site you visit, and on information on other websites and services you visit. This may result in you seeing advertisements on our Site or our advertisements when you visit other websites and services of third parties. For more information about how to turn this feature off, see below or visit <http://optout.networkadvertising.org/> and learn more about opting out of targeted ads. There you will find links for resources specifically for citizens of the United States, Canada, and the European Union.

Disabling Cookies

The effect of disabling cookies depends on which cookies you disable but, in general, our Site may not operate properly if all cookies are switched off. If you only disable third party cookies, you will not be prevented from making purchases on our Site. If you disable all cookies, you will be unable to complete a purchase on our Site.

If you want to disable cookies on our Site, you need to change your website browser settings to reject cookies. How you can do this will depend on the browser you use. Further details on how to disable cookies for the most popular browsers are set out below:

- For Google Chrome:
 1. Choose Settings> Advanced
 2. Under “Privacy and security,” click “Content settings”
 3. Click “Cookies”
- For Safari:
 1. Choose Preferences > Privacy
 2. Click on “Remove all Website Data”
- For Mozilla Firefox:
 1. Choose the menu “Tools” then “Options”
 2. Click on the icon “Privacy”
 3. Find the menu “Cookie” and select the relevant options

Where you have not set your permissions, we may also separately prompt you regarding our use of cookies on our Site.

Except for essential cookies, all cookies used on our Site will expire after two years or sooner.

6. Security of Personal Data

Pluralsight is committed to protecting the security of your personal data. We use a variety of security controls and procedures to help protect your personal data from unauthorized access, use, or disclosure. Our controls include the security measures outlined in Appendix A of our [Customer Data Processing Agreement](#).

7. Access to Third Party Services

This Privacy Notice applies only to our Site. The Site may contain links to other web sites not operated or controlled by us. The policies and procedures described here in our Privacy Notice do not apply to websites or other services that Pluralsight does not operate or control. These links from our Site do not imply that we endorse or have reviewed those websites including their privacy terms. When you leave our Site for a third party website, you will be subject to the terms of use and privacy terms associated with that third party website.

8. Individuals Subject to the GDPR

If your personal data is subject to the GDPR, the following apply to your personal data.

Pluralsight is acting as a data controller of your personal data when you access our Website and view information about us and our technology, communicate with us, download whitepapers, register for events, and consent to receive marketing communications from us and our affiliates.

If your access to the Platform is provisioned by your employer subject to Pluralsight's Enterprise Terms of Use or a Master Service Agreement, then your employer is the data controller with respect to any information you or your employer provide, or information otherwise collected through your registration and use of our services. This information typically includes first name, last name, business email address, and any other information you provide. We strictly prohibit you from providing any sensitive personal data. Where your employer is the data controller in this way, we act as a data processor under data protection laws, meaning we use the information under instruction from your employer to provide a service to your employer.

If you are registered as a user of the Platform under the Pluralsight Individual Terms of Use, then Pluralsight is the data controller for all personal data provided by that user and collected by the Platform as the user accesses and uses it. We strictly prohibit you from providing any sensitive personal data.

9. Individuals' Rights under GDPR

We remind you that you may at any time exercise the following rights:

- The right to request access to your personal data;
- The right to rectification or erasure of your personal data;
- The right to restrict to processing concerning your personal data;
- The right to **object** to processing concerning your personal data;
- The right to data portability;
- Where data processing is based on your consent, the right to withdraw consent at any time;
- The right to lodge a complaint with a supervisory authority.

10. Individuals Subject to CCPA

Under California law, California residents are entitled to certain privacy rights concerning their personal data. To learn more about those rights, please visit our [CCPA Privacy Notice](#).

11. Enforcement and Dispute Resolution

Any questions or concerns regarding our use or disclosure of personal data should be addressed to Customer Support at support@pluralsight.com. We will investigate and attempt to resolve any complaints and disputes regarding the use and disclosure of personal data in accordance with the provisions of this Privacy Notice.

Pluralsight has committed to refer unresolved complaints related to privacy matters to an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgement of your complaint from us, or if we have not resolved your complaint, please contact our third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

12. Retention of Personal Data

Generally we will keep your personal data for the duration of our relationship with you. After our relationship ends, we will retain your personal data for a period of time that permits us to satisfy the following purposes: record retention as may be required by applicable law; for use in a legal claim or proceeding; or to address any complaints regarding our services or the Website.

13. Trial or Free Accounts

This Privacy Notice applies to the processing of your personal data in conjunction with a user account of any kind, including an account that is offered without charge or on a trial basis, or an account that offers new or limited features.

14. International Data Transfers

The personal data that we collect from you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It will also be processed by staff operating outside the EEA who work for us or other entities acting as data processors processing data on behalf of us. This includes staff engaged in, among other things, the fulfillment of your request or order and the provision of support services.

Pluralsight ensures that appropriate safeguards are implemented to secure such data transfers in compliance with applicable data protection laws. We have implemented international data transfer agreements based on EU Standard Contractual Clauses to cover our international data transfers and a copy of these clauses can be obtained by contacting us at support@Pluralsight.com.

15. Privacy Shield

Although Pluralsight does not rely on the EU-U.S. Privacy Shield Framework as a legal basis for transfers of personal data in light of the judgment of the Court of Justice of the EU in Case C-311/18, Pluralsight does adhere to the principles of the EU-U.S. and Swiss-U.S. Privacy Shield frameworks with respect to personal data that is transferred from the European Union and its Member States, the European Economic Area, the United Kingdom and/or Switzerland, to the United States. If there is any conflict between the terms in this Privacy Notice and the privacy shield principles, the principles shall govern. With regard to the Privacy Shield Framework, Pluralsight is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. To learn more and view our certification, [visit the U.S. Department of Commerce's Privacy Shield website](#).

In the context of employee data, Pluralsight commits to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland.

You may have the option to select binding arbitration under the Privacy Shield Panel for the resolution of any complaint under certain circumstances. For further information, please visit the [U.S. Department of Commerce's Privacy Shield website](#).

16. Changes to this Privacy Notice

We update this Privacy Notice when necessary to provide greater transparency or in response to:

- Feedback from customers, regulators, industry, or other stakeholders;
- Changes in our products; or
- Changes in our data processing activities or policies.

When we post changes to this policy, we will provide a version and effective date for the most recent terms. If there are material changes to the policy, such as a change to the purposes of processing of personal data that is not consistent with the purpose for which it was originally collected, we will notify you either by prominently posting a notice of such changes on our Site before they take effect, or by directly sending a notification via email to all registered users of the Platform. We encourage you to periodically review this Privacy Notice to learn how Pluralsight is protecting your information.

17. How to Contact Us

Questions or comments regarding this Privacy Notice should be submitted to Pluralsight by email or phone as follows:

Email: support@pluralsight.com

Phone: (801) 784-9007 opt 1.

Physical Address: 42 Future Way, Draper, Utah 84020

[END OF PRIVACY NOTICE]