

PANTHEON AI

WEBSITE PRIVACY POLICY

Last Modified: January 1, 2024

At Pantheon AI, we take your privacy seriously. Please read this Website Privacy Policy (this “**Policy**”) to learn how we treat your personal data. **By using or accessing our Website in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Policy.**

Remember that your use of Pantheon AI's Website is at all times subject to our [Website Terms of Service](#), which incorporates this Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Website Terms of Use.

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this Privacy Policy Covers

This Policy covers how we treat Personal Data that we gather when you access or use our Website. “**Personal Data**” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Policy does not cover the practices of companies and websites we don’t own or control, or people we don’t manage.

Personal Data

Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

<u>Category of Personal Data</u>	<u>Examples of Personal Data We Collect</u>	<u>Categories of Third Parties With Whom We Share this Personal Data:</u>
Profile or Contact Data	<ul style="list-style-type: none">● First and last name● Email	

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- You

- When you provide such information directly to us.
 - When you use our tools and Website
 - When you send us an email or otherwise contact us.

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Website**
 - Providing you with the Website or information you request.
 - Meeting or fulfilling the reason you provided the information to us.
 - Providing support and assistance for the Website.
 - Improving the Website, including testing, research, internal analytics and product development.
 - Personalizing the Website, website content and communications based on your preferences.
 - Doing fraud protection, security and debugging.
 - Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws
- **Marketing the Website**
 - Marketing and selling the services and goods we offer on the Website.
- **Corresponding with You**
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Pantheon AI or the Website.
 - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
 - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
 - Protecting the rights, property or safety of you, Pantheon AI or another party.
 - Enforcing any agreements with you.
 - Responding to claims that any posting or other content violates third-party rights.
 - Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

How We Share Your Personal Data

- We do not currently share any Personal Data you provide us through the Website with any third parties.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Website and promote our business, provided that we will not share such data in a manner that could identify you.

Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. Although we work to protect the security of your data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as necessary to provide you with our Website. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

Personal Data of Children

As noted in the Website Terms of Use, we do not knowingly collect or solicit Personal Data about children under 18 years of age; if you are a child under the age of 18, please do not attempt to use the Website, make purchases from the Website, or send us any Personal Data. If we learn we have collected Personal Data from a child under 18 years of age, we will delete that information as quickly as possible. If you believe that a child under 18 years of age may have provided Personal Data to us, please contact us at support@pantheonai.co.

Personal Data Sales Opt-Out and Opt-In

We will not sell your Personal Data, and have not done so over the last 12 months. To our knowledge, we do not sell the Personal Data of minors under 18 years of age.

California Resident Rights

If you are a California resident, you have the rights set forth in this section.

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes; in order to submit such a request, please contact us at support@pantheonai.co. However, we do not currently disclose your Personal Data for direct marketing from third parties.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at support@pantheonai.co.

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CPRA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Website or complete an information request or other action you have requested, or if deletion of your Personal Data involves disproportionate effort. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

Correction

You have the right to request that we correct any inaccurate Personal Data we have collected about you. Under the CPRA, this right is subject to certain exceptions: for example, if we decide, based on the totality of circumstances related to your Personal Data, that such data is correct. If your correction request is subject to one of these exceptions, we may deny your request.

Personal Data Sales, Sharing, Opt-Out and Opt-In

We will not sell your Personal Data, and have not done so over the last 12 months. To our knowledge, we do not sell the Personal Data of minors under 18 years of age.

Over the past 12 months, we have shared the following categories of Personal Data with the categories of third parties listed for the following purposes:

· None

You have the right to opt-out of the sharing of your Personal Data under CPRA. However, we do not currently share your Personal Data with third parties.

We Will Not Discriminate Against You for Exercising Your Rights Under the CPRA

We will not discriminate against you for exercising your rights under the CPRA. We will not deny you our services or access to the Website, or provide you a lower quality of services if you exercise your rights under the CPRA.

Other State Law Privacy Rights

Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at support@pantheonai.co with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. However, we do not currently sell your Personal Data.

Virginia Resident Rights

If you are a Virginia resident, you have the rights set forth under the Virginia Consumer Data Protection Act ("VCDPA"). Please see the "Exercising Your Rights" section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers' end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data. Additionally, please note that these rights are subject to certain conditions and exceptions under applicable law, which may permit or require

us to deny your request. If there are any conflicts between this section and any other provision of this Privacy Policy and you are a Virginia resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at support@pantheonai.co.

Access: You have the right to request confirmation of whether or not we are processing your Personal Data and to access your Personal Data.

Correction: You have the right to correct inaccuracies in your Personal Data, to the extent such correction is appropriate in consideration of the nature of such data and our purposes of processing your Personal Data.

Portability: You have the right to request a copy of your Personal Data in a machine-readable format, to the extent technically feasible.

European Union and United Kingdom Data Subject Rights

EU and UK Residents

If you are a resident of the European Union (“EU”), United Kingdom (“UK”), Lichtenstein, Norway or Iceland, you may have additional rights under the EU or UK General Data Protection Regulation (the “GDPR”) with respect to your Personal Data, as outlined below.

For this section, we use the terms “Personal Data” and “processing” as they are defined in the GDPR, but “Personal Data” generally means information that can be used to individually identify a person, and “processing” generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. Pantheon AI will be the controller of your Personal Data processed in connection with the Website.

- If there are any conflicts between this section and any other provision of this Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at support@pantheonai.co.

Personal Data We Collect

The “Categories of Personal Data We Collect” section above details the Personal Data that we collect from you.

Personal Data Use and Processing Grounds

The “Our Commercial or Business Purposes for Collecting Personal Data” section above explains how we use your Personal Data.

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our “legitimate interests” or the legitimate interest of others, as further described below.

Contractual Necessity: None

- **Legitimate Interest:** We process the following categories of Personal Data when we believe it furthers the legitimate interest of us or third parties:

- Profile or Contact Data

Examples of these legitimate interests include (as described in more detail above):

- Providing, customizing and improving the Website.
- Making employment opportunities available to you.
- Marketing the Website.
- Corresponding with you.
- Meeting legal requirements and enforcing legal terms.

- **Consent:** In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.
- **Other Processing Grounds:** From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

Sharing Personal Data

The “How We Share Your Personal Data” section above details how we share your Personal Data with third parties.

EU Data Subject Rights

- You have certain rights with respect to your Personal Data, including those set forth below. For more information about these rights, or to submit a request, please email us at support@pantheonai.co. Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.
- **Access:** You can request more information about the Personal Data we hold about you and request a copy of such Personal Data by emailing us at support@pantheonai.co.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement your Personal Data by emailing us at support@pantheonai.co.
- **Erasure:** You can request that we erase some or all of your Personal Data from our systems.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilize some or all of our Website.
- **Portability:** You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.
- **Objection:** You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Right to File Complaint:** You have the right to lodge a complaint about Pantheon AI's practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: https://edpb.europa.eu/about-edpb/board/members_en.

Transfers of Personal Data

The Website is hosted and operated in the United States (“U.S.”) through Pantheon AI and its service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. By using the Website, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to Pantheon AI in the U.S. and will be hosted on U.S. servers, and you authorize Pantheon AI to transfer, store and process your information to and in the U.S., and possibly other countries. You hereby consent to the transfer of your data to the U.S. pursuant to: (i) a data processing agreement incorporating standard data protection clauses, (ii)

binding corporate rules for data protection that align with the GDPR's requirements, or (iii) adherence to an industry- or technology-specific approved code of conduct blessed by the European Commission.

Changes to this Privacy Policy

We're constantly trying to improve our Website, so we may need to change this Policy from time to time, but we will alert you to any such changes by placing a notice on the Website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Website, and you are still responsible for reading and understanding them. If you use the Website after any changes to the Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the version of this Policy in effect at the time such information is collected.

Contact Information:

If you have any questions or comments about this Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- <https://www.pantheonai.co>
- support@pantheonai.co