



## Privacy Policy

Effective Date: November 24, 2020 (v. 4.1)

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This Privacy Policy (“**Privacy Policy**”) applies to the corporate 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 (“**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**”). This Privacy Policy describes how Pluralsight collects and uses personal information collected through the Website and the Platform. It also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information.

### This Privacy Policy sets out:

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Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it. By engaging with the Website and the Platform you acknowledge you have read and understood this Privacy Policy. Data protection laws require companies to describe their role and responsibility when handling personal information.

European Economic Area Data Subject Rights:

If you are a resident of the European Economic Area, the following definitions apply to your data. When you access our Website and view information about us and our technology, communicate with us, download whitepapers, and register for events etc, we are the *data controller*.

When you engage with the Platform because your employer has signed up to a Business plan (as defined in our Terms of Use at <https://www.pluralsight.com/terms>, the “**Terms of Use**”) or a Company Partnership Subscription (see below), then;

- your employer is the data controller with respect to the user information it provides to us. This information typically includes first name, last name, and business email address. 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 to provide a service to your employer.
- Pluralsight is the data controller for information provided directly by you or as a result of interacting with the Platform, including assessment data, a secondary email address, additional profile details such as job title, personal website URL, a short bio, social platform handles, and demographic information such as your gender, year of birth, and your work industry. To be clear, none of these additional profile details are required to utilize our Site, but we can offer you an enhanced experience if you provide it.

When you sign up as a user of the Platform via an Individual Plan (as defined in the Terms of Use), Pluralsight is the data controller for all personal information provided by that user and collected by the Platform as the user accesses and uses it.

## **1. The information we collect about you**

We value your trust. In order to honor that trust, Pluralsight adheres to ethical standards in gathering, using, and safeguarding any information you provide.

**We collect and process the following personal information from you:**

- a. Information you give to us: This is information 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, corresponding with us by phone, e-mail, or at an in-person event. It includes information necessary to register for a subscription, pay for a subscription, or 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 any of the other Interactive Services (defined in the Terms of Use). When you create an account for our Platform, we require you provide first name, last name, and email address. When you purchase a subscription, we will need payment and billing information, often including an address and credit card information. Additionally, you can provide additional personal information to complete a profile within our system.

- b. Information we collect about you from your use of our Site: We will automatically collect information from you each time you visit our Site. 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 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.
- c. Information 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 the information we collect

- a. Information you give to us: Pluralsight uses the personal information you provide in a manner that is consistent with this Privacy Policy. We use your personal information to provide our services on our Site, including services arising from any obligations set forth in a contract between you and us. These 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 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 whitepapers, access to webinars, or the like.

We also use your personal information together with other personally non-identifiable information to help us better understand our users, to personalize and improve your experience with our Site, and to improve the content and functionality of our Site. This may include providing information about our goods and services that we feel may interest you and enhance your interaction with our Site. We will communicate with you about these goods and services via email, direct mail, telephone, or on our Site. These communications may include newsletters, promotional emails, product updates, or market research requests. We will use your information for this purpose only if you have given your consent to receive marketing material from us at the point we collected your information, where required by law, or otherwise in our legitimate interests, provided these interests do not override your right to object to such communications.

- b. Information we collect about you from your use of our Site: We will use this information in our legitimate interests (where we have considered these are not overridden by your rights), to administer our Site, and for internal operations, including troubleshooting, data analysis, testing, research, and statistical survey purposes. We will also use this information to keep our Site safe and secure, for measuring the effectiveness of how we present content and how we market and advertise. We use Internet protocol 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. We also utilize unstructured machine learning technologies to understand user behaviors and to provide user-specific

recommendations and other personalization of our Site experience.

- c. Information we receive from other sources: We will combine this information with information you give to us and information we collect about you in our legitimate interests (where we have considered that these are not overridden by your rights). We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### **3. Who we give your information to:**

We consider your personal information to be a vital part of our relationship with you and do not sell your personal information to third parties. There are, however, certain circumstances in which we may share your personal information with certain third parties, as follows:

- a. Agents, consultants and related third parties: We sometimes hire other companies 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 companies are not permitted to use any personal information that we share with them for any other purpose aside from providing services to us.

We also share information with third parties about customer engagement on our platform. For example, when you view a course about a 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 third parties does not include personal information.

- b. Business plans and company partnership subscriptions: We partner with certain third parties to provide our services to their employees or their community members. As part of such partnerships, a third party may pay for the subscription for its employees or community members or otherwise contract with Pluralsight to make your subscription available to you, and Pluralsight may share information about your use of our services with the third party. If your subscription was provided by your employer or community sponsor (including Company Partnerships as defined in the Terms of Use), we may share information you provide, or information we may otherwise collect through your registration and use of our services, with such third party. This information may include course viewing history, course viewing time, course or assessment completion, course quality ratings and feedback, certifications, performance-related metrics, and other personal information.
- c. Business transfers: As we develop our business, we might sell or buy businesses or assets. Your personal information may be transferred to a buyer or other successor in the event of a corporate sale, merger, reorganization, dissolution, or similar event in which

personal information held by us about our Site users is among the assets transferred.

- d. **Legal requirements:** In certain situations, Pluralsight may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We reserve the right to disclose your personal information as required by 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.

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

#### **4. Control of your information**

When you register, or otherwise give us personal information, we will not share that information with third parties without your permission, other than for the limited exceptions already listed. It will only be used for the purposes stated in this Privacy Policy. When Pluralsight is acting as a **data processor**, we will only process personal information in accordance with the instructions given by the data controller. When Pluralsight is acting as a **data controller**, we will act in accordance with your permission to offer you our services and as otherwise instructed by you. We will also give you the ability to opt out before we disclose your personal information to a third party or use your personal information for purposes that are fundamentally different than the purpose for which it was originally created.

If you would like to discontinue receiving communications from us, you may update your email preferences by using the “Unsubscribe” link found in emails we send to you or on the Communications Preferences Dashboard located in your member profile on our Site or by contacting us at [support@pluralsight.com](mailto:support@pluralsight.com). Please note that we may not include the opt-out information in e-mails that are transactional in nature and are not marketing communications (i.e., e-mails concerning your order, the website’s Terms of Use, etc.). You will not have the ability to opt-out of receiving transactional emails via the Communications Preferences Dashboard. If you have questions or concerns regarding a transactional e-mail, please contact us.

#### **5. Your access to your information and how long we keep it**

Upon request, Pluralsight will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. To request this information please contact us at [support@pluralsight.com](mailto:support@pluralsight.com).

We will provide you with the means to ensure that your personal information is correct and current. If you have registered to use the Platform, we will provide a way for you to access and change your profile on our Platform. We will also allow you to completely delete your profile along with all personal information associated with that profile, although this option may significantly degrade your experience with our Platform. You may request deletion by accessing your profile and clicking on the link available there. Alternatively, you may contact us at [support@pluralsight.com](mailto:support@pluralsight.com). We will respond to your request within a reasonable timeframe. Requesting deletion of your account means your personal information is permanently deleted and cannot be retrieved.

If you would like to view your personal information that we hold at any time, you may access your profile from our Site.

We retain your information while your account is active or as needed to provide you services. Thereafter, we may retain certain personal information indefinitely as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We may also retain aggregate information for research purposes and to help us develop and improve our Site and services.

## **6. How we protect your information**

The security of your personal information is important to us. When you enter sensitive information (such as a credit card number) on our checkout page, your information is sent over an authenticated and encrypted connection using Transport Layer Security (TLS).

We store your personal information only on servers with limited access that are located in controlled facilities and use a variety of technologies and procedures intended to protect your personal information from loss, misuse, unauthorized access, disclosure, alteration and destruction. Nonetheless, no communication via the Internet can ever be 100% secure, and no security measures can ever be assured to be effective. Accordingly, you are advised to use caution and discretion when determining what personal information to disclose to us.

If you have any questions about security on our Site, contact us as follows:

Email: [support@pluralsight.com](mailto:support@pluralsight.com)

Phone: (801) 784-9007 opt 1

## **7. Where we store your information**

The data that we collect from you is transferred to, and stored at, a destination in the United States. Data transfers from the European Economic Area are governed by the Standard Contractual Clauses, which are incorporated into the Terms of Use. Pluralsight has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework (“**Privacy Shield**”). Though these frameworks have been ruled invalid for the transfer of data out of the EEA, Pluralsight will continue to protect data already transferred from the EEA pursuant to the Privacy Shield principles.

## **8. Use of Cookies**

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 good and personalized user experience when you interact with our Site and also allows us to improve our Site. Pluralsight participates in the Adobe Marketing Cloud Device Co-op to better understand how you use our platform with the devices you use to access it, and to allow us to deliver tailored promotions. The Co-op uses device information, rather than personal information, to enable seamless transitions between devices. Learn more at <https://cross-device-privacy.adobe.com>.

Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that. We also give you 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 last for longer. We use these cookies on the basis that they are necessary for the performance of a contract with you, or because using them is in our legitimate interests (where we have considered that these are not overridden by your rights), and, in some cases, where required by law, where you have consented to their use.

We use the following types of cookies:

- a. Strictly necessary cookies. 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.
- b. Analytical/performance cookies. They 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.
- c. Functionality cookies. 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).
- d. Targeting cookies. 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 <https://preferences-mgr.truste.com> 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 Microsoft Internet Explorer:**

- Choose the menu “tools” then “Internet Options”
- Click on the “privacy” tab

- Select the setting the appropriate setting

#### **For Google Chrome:**

- Choose Settings> Advanced
- Under “Privacy and security,” click “Content settings”.
- Click “Cookies”

#### **For Safari:**

- Choose Preferences > Privacy
- Click on “Remove all Website Data”

#### **For Mozilla Firefox:**

- Choose the menu “tools” then “Options”
- Click on the icon “privacy”
- Find the menu “cookie” and select the relevant options

#### **For Opera 6.0 and further:**

- Choose the menu Files”> “Preferences”
- Privacy

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.

### **9. Links to other websites**

This Privacy Policy 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 do not apply to web sites 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 web sites or other services. We suggest contacting those services directly for information on their privacy policies.

### **10. California Resident Privacy Rights**

Under California law, California residents are entitled to certain privacy rights concerning their personal information. If you are a California resident, you have the right to ask us for a notice identifying the categories of your personal information that we shared with third parties for their direct marketing purposes in the previous twelve (12) months. You may make this request twice a year, free of charge; see the “Contact Us” section below for details on where to send such requests. You will need to provide information that will allow us to verify your identity to ensure continued protection of your personal information. We do not share personal information with third parties for their direct marketing purposes without your consent, which may be withheld or withdrawn at any time.

### **11. Information about our participation in Privacy Shield**

Pluralsight participates in and has certified its compliance with the EU-U.S. and the Swiss-U.S. Privacy Shield frameworks. We are committed to subjecting all information received from the European Union

("EU"), the United Kingdom ("UK"), the European Economic Area and Switzerland which constitutes "personal data" subject to the EU's, the UK, and Switzerland's privacy laws ("EU, UK, and Swiss Personal Data"), in reliance on Privacy Shield, to the applicable Privacy Shield Principles. To learn more about Privacy Shield and to view our certification, visit the U.S. Department of Commerce's Privacy Shield List (<https://www.privacyshield.gov/list>). Our compliance with applicable Privacy Shield Principles is further described as follows:

- a. Collection and use; purpose. Pluralsight collects and uses EU, UK, and Swiss Personal Data as described in the sections above about how we collect and use personal information.
- b. Third-party disclosure. We may disclose EU, UK, and Swiss Personal Data as described in the sections above about how and when we disclose personal information.
- c. Security. Pluralsight protects the security of EU, UK, and Swiss Personal Data during transfer and storage as described in the sections above about how we protect personal information.
- d. Onward transfer. Where Pluralsight transfers personal data from the EU, UK, or Switzerland, we do so under the Privacy Shield framework. Pluralsight maintains contracts with third parties who act on behalf of Pluralsight and to whom we transfer personal data that restrict their access, use, and disclosure of personal data in compliance with our Privacy Shield obligations. Pluralsight complies with the Privacy Shield Principles for all onward transfers of EU, UK, and Swiss Personal Data, including the onward transfer liability provisions.
- e. Access and choice. Residents of the EU, UK, and Switzerland whose personal data Pluralsight has directly collected may request access to, and the opportunity to correct, amend, or delete such personal data. To submit such requests or raise any other questions, please contact us at [support@pluralsight.com](mailto:support@pluralsight.com). Pluralsight reserves the right to take appropriate steps to authenticate an applicant's identity and charge a reasonable fee before providing access and deny requests, except as required by the Privacy Shield principles.
- f. Recourse; enforcement; liability. Pluralsight complies with the Privacy Shield Principles for recourse, enforcement and liability. Pluralsight uses a third party (outside compliance review) agent to assure compliance with this Privacy Policy and periodically verifies that this Privacy Policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformance with Privacy Shield principles. You may direct inquiries or complaints concerning our Privacy Shield compliance to [support@pluralsight.com](mailto:support@pluralsight.com). Pluralsight will respond within 45 days. If we fail to respond or if our response did not satisfactorily address your concern, you may file a report with our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>. Pluralsight has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship. Under certain conditions, more fully described on the Privacy

Shield website at <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

- g. Jurisdiction. With respect to EU, UK, and Swiss Personal Data received or transferred pursuant to the Privacy Shield framework, Pluralsight is subject to the regulatory investigation and enforcement powers of the U.S. Federal Trade Commission.

## **12. Public forums**

The Site may, from time to time, make chat rooms, message boards, news groups, or other public forums available to its users, whether by way of our own services or by way of the services or features of a third party. Any information that is disclosed in these areas becomes public information and you should exercise caution when using these areas and avoid posting any personal or sensitive information. If a separate login is required to use these areas, please be aware that you may need to also log out separately.

## **13. Payment processing**

When you purchase a subscription directly from Pluralsight, 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. Payments made on our Site are made through one of our payment gateway providers, Cybersource, Adyen, or PayPal (“**Payment Processors**”), which may be changed from time to time. You will be providing credit or debit card information directly to the Payment Processor which operates a secure server to process payment details, encrypting your credit/debit card information and authorizing payment. Information which you supply to the Payment Processor is not within our control and is subject to the Payment Processor’s own privacy policy and terms and conditions.

## **14. Information about enforcement and dispute resolution**

We will conduct compliance audits of our relevant privacy practices to verify compliance with this Privacy Policy. Any Pluralsight employee that we determine has acted in violation of this Privacy Policy will be subject to disciplinary action up to and including termination of employment.

Any questions or concerns regarding our use or disclosure of personal information should be addressed to Customer Support at [support@pluralsight.com](mailto:support@pluralsight.com). We will investigate and attempt to resolve any complaints and disputes regarding the use and disclosure of personal information in accordance with the provisions of this Privacy Policy.

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>.

## **15. Changes to this Privacy Policy**

As our Site evolves, this Privacy Policy will need to evolve as well to cover new situations. To ensure that you are kept informed of changes, check this Privacy Policy periodically as we will update the date at the top of the document any time we make a change. If we make material changes to this Privacy Policy, we will post the revised policy on this page and will send a notice via email or our Site to all registered users of the Platform. Your continued use of our Site after any such changes constitutes your acceptance of the

new Privacy Policy. If you do not agree to abide by these or any future version of the Privacy Policy, you do not have permission to use or access (or continue to use or access) our Site.

#### **16. Contact us**

Questions or comments regarding this Privacy Policy should be submitted to Pluralsight by e-mail or phone as follows:

Email: [support@pluralsight.com](mailto:support@pluralsight.com)

Phone: (801) 784-9007 opt 1.

Physical Address: 42 Future Way, Draper, Utah 84020

[END OF PRIVACY POLICY]