



Privacy Policy

This Privacy Policy (“**Policy**”) describes how Collibra Belgium BV and its affiliates (“**Collibra**”, “**we**”, “**us**” or “**our**”) collect, use, protect and share your Personal Information on our website and online platforms (e.g., [collibra.com](#), [Collibra Community](#), [Collibra University](#), [Collibra Documentation](#), and [Collibra Marketplace](#)) (the “**Platforms**”) or when you otherwise interact with us, including at marketing events, trade shows, webinars, and through other business development activities (collectively, the “**Services**”).

Our Services are designed for businesses and are not intended for personal or household use. Accordingly, we treat all personal information covered by this Policy, including information about any visitors to our website, as pertaining to individuals acting as business representatives rather than in their personal capacity.

This Policy does not apply to the Personal Information processed, maintained, or otherwise managed by Collibra solely for the benefit of, on behalf of, or under the exclusive direction or control of its customers in Collibra’s capacity as a service provider. To learn more about the processing of your Personal Information in that context, please consult the relevant customer’s privacy policy as well as [Collibra’s Data Processing Addendum](#).

In addition, this Policy does not apply to the Personal Information processed, maintained, or otherwise managed by Collibra in the context of applicants for employment with Collibra. To review our [Applicant Privacy Statement](#), [click here](#).

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Personal Information we collect.

In this Policy, “**Personal Information**” means any information relating to an identified or identifiable natural person. We collect Personal Information about you, either directly from you (e.g., when you register an account) or indirectly through automated methods (e.g., via cookies) as listed below.

Where applicable, we indicate in this Policy if and why we need you to provide us with your Personal Information and the consequences if you choose not to provide your Personal Information. For example, you may not be able to benefit from our Services if that Personal Information is necessary to provide you with such Services or if we are legally required to collect it.

- **Personal Information provided by you.**
 - **Business Contact Information.**

We may receive professional contact details of employees and other individuals associated with our customers, partners, and vendors, such as first and last name, email address, phone number, title and department, and other Personal Information relevant to the particular business relationship.

- **Account information.**

When you register for our Services, we collect your first and last name, user name, profile picture, password, and email address.

- **Communication with Collibra.**

When you contact us via a contact form, via email, via our helpdesk, or by any other means (e.g., to request a demo, to request technical support, to download content from our Platforms, to ask a question via our online contact form, to propose a course on Collibra University), you may provide us with your name, email address, phone number, mailing address, company, title or role and the contents and nature of your correspondence with us.

- **In-Platform communication.**

If you have a registered account, you can also send messages through, and post comments on, our Platforms. When you do so, we collect the Personal Information you choose to provide us, such as your contact details, any images you choose to upload, and the contents and nature of your message.

- **Notifications and marketing messages.**

When you sign up to receive notifications or marketing from us, you may provide us with your name, email address, company, and title/role, depending on the sign-up form that you use (e.g., for product updates, community announcements, newsletters).

- **Personal Information we automatically collect.**

We, and third parties we authorize, collect information using cookies, web beacons, pixels, and similar technologies. We may combine this automatically collected log information with other information we collect about you. Learn more about our use of cookies and similar technologies below. This information, whether gathered through these technologies or otherwise, may include IP addresses, device information, date/time of visits, new or returning visits, products viewed, page response times, URL clickstreams, how long you stay on our pages, what you do on those pages, browser type, Internet service provider (ISP), referring/exit pages, operating system, and information about your interactions with the communications we send to you.

- **Personal Information we collect from other sources.**

Additionally, we may receive Personal Information about you from other third parties whom you have authorized to share such information, who have obtained and may share your Personal Information for legitimate, lawful business purposes, or who collect such Information in connection with co-branded offerings. For example, when you request information or register for information or Services through Collibra business partners, we receive your Personal Information as necessary to provide you with that information or those Services (e.g., through a Collibra product reseller or through a Collibra partner when you register to attend a Collibra event).

- **Investors.**

We may collect, use, and share Personal Information from and about investors as described throughout this Privacy Policy, as well as in connection with an investment-related transaction with investors or others, which may include the disclosure of Personal Information about investors to third parties to facilitate the implementation, administration, and management of such transaction.

How we use your Personal Information.

The main purpose for which we use your Personal Information is to provide you with our Services and to improve your customer experience. Subject to our compliance with applicable privacy laws, and under the legal bases described in this Policy, we may use your information for the following purposes:

- **Providing our Services.**

We use Personal Information to provide, maintain, and improve our Services.

- **Communicating with you.**

We may use your contact details to contact you for administrative purposes (e.g., to send you confirmations, invoices, technical notices, updates, and security alerts, to provide customer services and information that you request, or to respond to comments

and questions), if we determine you, in a professional capacity, would benefit from our products or service. We may also use your contact details to follow up with you if you have demonstrated an interest in our products, services, or business (e.g., by accessing Collibra Test Drive or downloading content).

- **Personalization.**

We may use your Personal Information to personalize your experience of our Services, such as presenting tailored content.

- **Marketing and tailored advertising.**

We may send you updates about our Services as well as offers, promotions, and events offered by Collibra. We may also provide you with information about topics or content that we think will be of interest to you based on your preferences, behavior and interactions with our Services. For direct marketing by electronic means, we will do so with your prior consent where required by applicable law. You may withdraw your consent at any time by following the unsubscribe instructions in our communications or by contacting us at privacy@collibra.com. Additionally, we and our advertising partners may use cookies and similar technologies to serve tailored online ads. Please view a description of how we use cookies below for more information. We also audit the effectiveness of our marketing and advertising efforts by counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.

- **Analytics, benchmarking, and product development.**

We and our service providers use Personal Information, such as your interactions with our Services (including Personal Information collected via automated means), to perform benchmarking, monitor and analyze usage of our Services, and improve and enhance them.

- **Connecting Third Party Services.**

We may use your Personal Information to facilitate the connection of third-party services or applications, such as social networks.

- **De-identification and Aggregation.**

We may de-identify and aggregate information collected through our Services and use it for any lawful purpose(s).

- **Fraud and Incident Detection and Prevention.**

We may use your Personal Information to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.

- **Legal.**

We may use your Personal Information to enforce this Policy, our [Terms of Service](#), and other internal policies; to defend our legal rights; or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.

- **With your consent.**

We may use your Personal Information for other purposes for which we provide specific notice at the time the information is collected and obtain your consent.

We do not use Personal Information for automated decision-making that produces legal or similarly significant effects on you without human involvement. Where required by applicable law, we will inform you about the existence of automated decision-making, including profiling, and provide meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing.

How we share your Personal Information.

We may disclose Personal Information to third parties if you consent to us doing so, as well as in the following circumstances:

- **With our vendors and service providers.**

We work with third-party vendors to operate our Services, including IT hosting and maintenance, marketing, accounting, analytics providers, and other services for us (e.g., Marketo). These third parties may have access to or process your Personal Information as part of providing those services for us.

- **With our affiliates.**

- **With third parties integrated into our Services.**

We may share information with third parties integrated into our Services, including social networks.

- **With advertising partners.**

Third-party advertising companies may process your Personal Information for the tailored advertising purposes described in this Privacy Policy.

- **For legal purposes.**

We may disclose your Personal Information if required to do so by law or in the good-faith belief that such action is necessary to comply with state and federal laws, in response to a court order, judicial or other government subpoena or warrant, or otherwise in cooperation with law enforcement or other governmental agencies. We also reserve the right to disclose your Personal Information that we believe, in good faith, is appropriate or necessary to: (i) guard against liability, (ii) protect ourselves or others from fraudulent, abusive, or unlawful uses or activity, (iii) investigate and defend ourselves against any third-party claims or allegations, (iv) protect the security or integrity of our Services and any facilities or equipment used to make our Services available, or (v) protect our property or other legal rights, including to enforce our agreements, or the rights, property, or safety of others.

- **As part of a merger or other corporate transaction.**

Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, successor, or assignee as part of any merger, acquisition, debt financing, sale of assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

- **With your consent.**

In certain cases, you will have consented to us using your Personal Information, for example, to send marketing communications (where applicable law requires such consent) and to collect information via certain cookies and similar technologies.

- **Aggregated and de-identified Information.**

We aggregate and de-identify your Personal Information so that the information no longer relates to you individually. We may disclose aggregated and de-identified data for any purpose.

Your privacy choices and rights.

Subject to exceptions provided by applicable law and depending on your jurisdiction, you may have the right to exercise the following rights:

- **Right to access/know:** Access the Personal Information we maintain about you, including the categories of Personal Information collected, the sources from which it was collected, the purposes for collection, and the categories of third parties with whom we share it.
- **Right to delete/erasure:** Request deletion of the Personal Information we maintain about you, subject to certain legal exceptions (e.g., where we need to retain data for legal compliance, exercising legal claims, or completing transactions).
- **Right to correct/rectification:** Request correction of inaccurate Personal Information we maintain about you, taking into account the purposes of the processing.
- **Right to opt out:** Opt out of certain uses of your personal information. This includes the right for you to opt out of your personal information being used for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by you.
- **Right to data portability:** Receive your Personal Information in a structured, commonly used, and machine-readable format and transmit that data to another controller without hindrance.
- **Right to object:** Object to the processing of your Personal Information where we rely on legitimate interests as our legal basis, including for direct marketing purposes.
- **Right to withdraw consent:** Where we rely on your consent for processing, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to unsubscribe from email marketing:** You can unsubscribe from our marketing communications at any time by following the instructions contained within such communications or by contacting us at the email address below. However, please note that if you are a registered user of our Services, you may still receive administrative messages from us regarding our Services.
- **Right to limit tailored advertising:** You can limit the use of cookies and other tracking technologies using the cookie preference tool within our cookie banner found at the bottom left-hand side of our website or via the instructions found in the 'Online tracking technologies and how to opt-out' section below.

You can exercise these rights by emailing the Colibra privacy team directly at privacy@colibra.com or by contacting us via the options under the Contact Us section below. We may need to verify your identity before fulfilling your request. For California residents, authorized agents may submit requests on your behalf with appropriate written authorization. Appeals of any decisions made by Colibra regarding such requests can be made via the same process. We will respond to verified requests within the timeframes required by applicable law.

Online tracking technologies and how to opt-out.

We, and third parties we authorize, use cookies, web beacons, pixels, tags, scripts, and other similar tracking technologies to collect directly from your device information about your browsing activities, your interactions with websites and content and the device you are using to connect to the Internet, and to serve you personalized ads. These technologies enable us to distinguish you from other visitors, understand how you interact with our website, and help us improve our Services.

When required under applicable law, we obtain your prior consent before placing non-essential cookies (such as analytics or advertising cookies) on your device or before using similar technologies (such as tracking pixels). Strictly necessary cookies and similar technologies are those that are essential for the operation of our services, and do not require consent. You can manage your preferences regarding our use of cookies and similar technologies through our cookie consent banner, which appears when you first visit our website and can be accessed at any time via the cookie settings link in our website footer or via the link in the footer of any marketing email that we send. If you have any questions, you can contact us at privacy@colibra.com.

Below is an overview of the types of cookies and similar technologies we use:

- **Strictly necessary cookies.**

These cookies allow core website functionality such as user login and account management. Our relevant Services cannot function properly without these cookies.

- **Performance cookies.**

These cookies, also known as “analytics cookies,” track how visitors interact with our Services and allow us to improve our Services. We may use our own analytics cookies or cookies offered by our third-party service providers, such as Google Analytics, that collect and process Personal Information on our behalf. You can learn about Google's practices by going to <https://www.google.com/policies/privacy/partners/>.

- **Functional cookies.**

We use these cookies to remember user preferences, e.g., language, timezone, and enhanced content, which allows us to personalize your experience with our Services.

- **Tailored advertising cookies.**

We and certain third parties, such as content providers and banner networks, use these cookies to track the activity of users of our Services over time and across the web. The cookies allow companies to engage in tailored advertising, as described above.

- **Global Privacy Control (GPC) and Do Not Track Signals.**

We recognize the Global Privacy Control (GPC) signal as a valid opt-out of sale/sharing for purposes of California law and other applicable U.S. state privacy laws. When we detect a GPC signal, we will treat it as a valid request to opt out of the sale and sharing of Personal Information associated with that browser. We do not currently respond to other Do Not Track (DNT) browser signals, as there is no industry-wide standard for DNT.

For a current, complete list of all cookies on our website, please visit the cookie preferences section of our cookie banner, where you can manage your cookie preferences in accordance with the categories listed above.

- **Email tracking technologies.**

Email tracking pixels are small, invisible images embedded in emails that send information back to the sender when the email is opened. These pixels may collect information about whether and when an email was opened, which links were clicked, the type of device used, and the IP address. We use this information to measure campaign performance, personalize future content, and manage email deliverability.

There are a number of ways to opt out of having your online activity and device data collected through these services, which we have summarized below:

- **Opting out of cookie use in our cookie preferences.**

You can opt out of cookies via our cookie preferences center available to you on the bottom left-hand corner of our website.

- **Blocking cookies in your browser:**

Most browsers let you remove or reject cookies, including cookies used for tailored advertising. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org.

- **Blocking advertising ID use in your mobile settings:**

Your mobile device settings may provide functionality to limit the use of the advertising ID associated with your mobile device for tailored advertising purposes.

- **Using privacy plug-ins or browsers:**

You can block our websites from setting cookies used for tailored ads by using a browser with privacy features, like Brave, or installing browser plugins like [Privacy Badger](#), [Ghostery](#), or [uBlock Origin](#), and configuring them to block third-party cookies/trackers. You can also opt out of Google Analytics by downloading and installing the browser plug-in available at: <https://tools.google.com/dlpage/gaoptout>.

- **Advertising industry opt-out tools:**

You can also use these opt-out options to limit the use of your information for tailored advertising by participating companies:

- Digital Advertising Alliance for Websites: <https://optout.aboutads.info/>
- Digital Advertising Alliance for Mobile Apps: <https://www.youradchoices.com/appchoices>

- **With each platform individually:**

The advertising cookies partners below offer opt-out features that let you opt out of the use of your information for tailored advertising:

Cloudflare	Cloudflare Privacy Policy
Google Analytics	Google Analytics Opt-Out
Google	Google Advertising Opt-Out
Microsoft/Bing	Microsoft Personalized Ads Opt-Out
LinkedIn	LinkedIn Advertising Preferences
Demandbase	Demandbase Opt-Out
HotJar	HotJar Do Not Track Preferences
Bizzabo	Bizzabo Privacy Policy
Marketo	Adobe Opt-Out
StackAdapt	StackAdapt Opt-Out
Beeswax	Beeswax Privacy Policy
LiveIntent	LiveIntent Ad Choices
6sense	6sense Opt-Out
Reddit	Reddit Privacy Policy
Qualified	Qualified Cookie Policy

SurveyMonkey	SurveyMonkey Privacy Policy
Wufoo	Wufoo Privacy Policy

Note that because these opt-out mechanisms are specific to the device or browser on which they are exercised, you will need to opt out on every browser and device that you use.

How we secure your Personal Information.

We take appropriate security measures on both a technical and an organizational level designed to keep your Personal Information secure. Our technical, administrative, and physical procedures are designed to protect Personal Information from loss, theft, misuse, and accidental, unlawful, or unauthorized access, disclosure, alteration, use, and destruction. The transmission of data via the Internet is not completely secure, and we cannot guarantee the security of your information. You also share responsibility for maintaining the privacy and security of your Personal Information, for example, by not permitting any third party to access your personal Collibra account and by avoiding all other non-authorized access to your login and access code. We encourage you to immediately notify us of any unauthorized use of your personal account by sending an email to privacy@collibra.com.

How long we retain your Personal Information.

We take measures to delete your Personal Information or keep it in a form that does not permit us from personally identifying you when this information is no longer necessary for the purposes for which we process it unless we are required by law to keep this information for a longer period. When determining the retention period, we take into account various criteria, such as the type of information or engagement requested by you, the Services we are providing you, the nature and length of our relationship with you, the impact on the Services we provide to you or the if we delete some information from or about you, and mandatory retention periods provided by law and the statute of limitations.

U.S. State-Specific Privacy Notice.

Several U.S. states have enacted comprehensive privacy laws, such as the California Consumer Privacy Act, as amended by the California Privacy Rights Act or "CPRA" (collectively, the "**CCPA**"). These state privacy laws create additional privacy obligations for businesses and provide their residents with additional privacy rights. In addition to the rights granted above, if you are a resident in certain US States, you have the right to:

- **Opt out of the "sale" or "share" of your Personal Information.**

We do not 'sell' or 'share' your personal information for monetary benefit. However, the use of some third party cookies placed on our website may be considered "selling" or "sharing" of personal data under California law. You may opt out of such cookies as detailed in 'Online tracking and how to opt out' section (above).

- **Opt out of targeted advertising.**

Some third-party cookies on our website are used for targeted advertising purposes. You may opt out of such cookies as detailed in the 'Online tracking and how to opt-out' section (above).

- **Opt out of profiling.**

Opt out of profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

- **Non-discrimination:**

We will not discriminate against you for exercising any of your privacy rights, including by denying goods or services, charging different prices, or providing a different level or quality of services.

Sensitive Personal Information.

While the Services are not designed to collect sensitive Personal Information, you should note that:

- California residents have the right to limit the use and disclosure of their sensitive personal information to uses necessary to perform the Services or as otherwise permitted by law.
- If you would like to exercise your right to limit the use of sensitive personal information, please use our cookie preference center or contact us at privacy@collibra.com.

If you would like to exercise your rights related to the data Collibra hosts on behalf of its Customers, then please contact that Customer directly. Collibra can not provide you with any information related to the personal information we process on behalf of our Customers.

Service Provider Designation:

Under the CCPA, Collibra operates as a Service Provider on behalf of its business customers.

Verification

When you submit a privacy request, we will verify your identity by matching information you provide with information we have on file. For certain requests, we may require additional verification steps to protect your privacy and security.

Notice to EEA and UK Residents.

Legal Basis:

Under EU, UK, and Swiss law, we process personal data (as defined by the General Data Protection Regulation (“**GDPR**”) and UK GDPR) under the following legal bases:

Collibra Processing Activity Legal Bases

Placement of cookies on our website	Consent
Use of tracking technologies in emails	Consent
Collection and Processing of Personal Information to maintain and fulfill the Services	Contract Fulfillment
Improving our Services	Legitimate Interest
Marketing Communications	Legitimate Interest or Consent

Controller/Processor Designation:

Under EU, UK, and Swiss law, we are designated as a “Controller” for the collection and use of our Customers’ administrative representatives’ personal data to communicate, maintain their accounts, and fulfill the Services. For all other uses of our Customers’ personal data, we are designated as a ‘Processor’.

How we transfer your personal data

We may transfer your personal data to countries other than the country where you are located, including to the United States or any other country in which we or our service providers maintain facilities. Where your personal data is transferred from the EEA or UK to a country that has not received an adequacy decision under applicable law, such transfers will be subject to the Standard Contractual Clauses as set out at https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj?uri=CELEX%3A32021D0914&locale=en#ntc12-L_2021199EN.010037-01-E0012. Transfers from the UK will also be subject to the UK’s International Data Transfer Addendum (IDTA).

Additional Rights for UK or European Economic Area Residents

In addition to the rights granted above, if you are a UK or EEA resident, you have additional rights, including the ability to lodge a complaint against us with your local data protection authority. You can find your EU data protection authority at https://edpb.europa.eu/about-edpb/about-edpb/members_en, your UK data protection authority at <https://ico.org.uk/>, and your Swiss data protection authority at <https://www.edoeb.admin.ch/en>.

Data Privacy Framework.

- **Commitment.**

Collibra complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension of 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 and the European Commission (the “**Principles**”) regarding the collection, use, and retention of Personal Information (as defined under the Principles) transferred from the European Union, United Kingdom, and Switzerland to the United States in reliance on the EU-U.S. DPF, UK Extension, or Swiss-U.S. DPF, as applicable.

Collibra has certified to the Department of Commerce that it adheres to the Principles with respect to such Information. If there is any conflict between the terms in this Policy and the Principles, the Principles shall govern. To learn more about the Data Privacy Framework program and to view our certification, please visit <https://www.dataprivacyframework.gov>.

- **Recourse, enforcement, and liability.**¹

If you have any inquiries or complaints regarding our compliance with the Principles, we encourage you to contact us as listed in the “Contact us” section below. In compliance with the Principles, we commit to resolving complaints about our collection or use of your Personal Information. EU, UK, and Swiss individuals with inquiries or complaints regarding our DPF policy should first contact us at: privacy@collibra.com.

We have further committed to refer unresolved DPF complaints to JAMS, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact or visit JAMS DPF complaints for more information or to file a complaint. Information on how to contact JAMS is available at <https://www.jamsadr.com/DPF-Dispute-Resolution>. Under certain conditions, as further explained in the Principles, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted. The services of JAMS are provided at no cost to you.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a DPF Panel. Collibra is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

- **Accountability for onward transfers of Personal Information.**

If Collibra shares EU, UK, or Swiss Personal Information with a third-party service provider that processes the Personal Information solely on Collibra’s behalf, then Collibra may be held liable for that third party’s processing of such Personal Information in violation of the Principles unless Collibra can prove that it is not responsible for the event giving rise to the

Third-party sites.

Our Services may contain features or links to websites and services provided by third parties. Any information you provide on third-party websites or services is provided directly to the operators of such websites or services and is subject to those operators’ policies governing privacy and security, even if accessed via our Services. We are not responsible for the content or privacy and security practices and policies of third parties to which are linked through our Services. We encourage you to consult the third parties’ privacy and security policies to learn more about how they collect and use your Personal Information.

Children’s Privacy.

Our Services are designed for business users and are not directed at children. We do not knowingly collect Personal Information from children under the age of 16 (or under 13 in the United States under the Children’s Online Privacy Protection Act (COPPA)). The age threshold may vary depending on applicable local law: (i) in the United States, 13 years of age under the COPPA; (ii) in the EU/EEA and UK, 16 years of age under GDPR (unless member state law specifies a lower age, but not below 13); (iii) in other jurisdictions, as required by local law. We do not have actual knowledge that we sell or share the Personal Information of minors, however if we are informed that we have collected Personal Information from a child below the applicable age threshold without verified parental or guardian consent, we will take steps to delete that information as soon as possible. If you are a parent or guardian and believe that a child has provided us with Personal Information without your consent, please contact us at privacy@collibra.com.

Changes to this Policy.

We may update this Policy to reflect changes in our privacy practices. If we update this Policy, we will make it available through the Services and indicate the date of the latest revision at the top of this Policy. If we materially change how we use or share Personal Information previously collected from you through the Services, we will notify you through the Services, by email, or other communication, as appropriate.

Contact Us.

If you have any questions about this Policy, please contact us by email at privacy@collibra.com or by post to:

Colibra Belgium BV
Attn: Data Protection Officer
Picardstraat 11 B 205
1000 Brussels
Belgium

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