

PRIVACY POLICY

Date: April 24, 2025

General information

Thank you for your interest in Bristlecone, with corporate headquarters at 10 Almaden Blvd, Suite 990, San Jose, CA 95113 (referred to as “Bristlecone,” “we,” “us,” or “our”). We take data protection and privacy issues very seriously and comply with the applicable state/provincial, federal/national, and European data protection data protection laws. One such law is the European Union’s General Data Protection Regulation (“GDPR”).

We also comply with India’s Digital Personal Data Protection Act, 2023 (DPDPA), and California’s Consumer Privacy Rights Act (CPRA) where applicable.

In light of our obligations under applicable data protection laws, we would like to inform you with this policy about data protection measures and which personal data we may store and how we use this personal data.

In line with global privacy laws such as GDPR, DPDPA, and CPRA, Bristlecone follows the principles of data minimization and purpose limitation. This means we only collect personal data that is necessary for the intended business purpose, and we use it solely for the purposes specified at the time of collection.

This is Bristlecone’s worldwide privacy policy. It covers the privacy practices of the following “Bristlecone Group Companies”:

- Bristlecone Inc. in the United States
- Bristlecone Consulting Ltd. in Canada
- Bristlecone GmbH in Germany
- Bristlecone International AG in Switzerland
- Bristlecone UK Limited in the United Kingdom
- Bristlecone Middle East in the United Arab Emirates
- Bristlecone India Limited in India
- Bristlecone Malaysia Sdn. Bhd. in Malaysia
- Bristlecone Singapore Pte. Ltd. in Singapore
- Bristlecone Worldwide Inc. USA
- Bristlecone International Costa Rica SRL

“Bristlecone” refers to all of the Bristlecone Group companies collectively.

This privacy policy describes the categories of personal data Bristlecone collects and their sources, how we process personal data, the circumstances in which we will disclose personal data, how we safeguard personal data, exercising individual rights regarding personal data, and

resolving disputes relating to Bristlecone’s privacy practices concerning personal data. This policy covers:

- Personal data collected through the Bristlecone website (referred to as the “Site”)
- Personal data collected via Bristlecone’s social media pages
- Personal data from representatives of current, prospective, or past customers relating to customer accounts and their management (“Account-Related Information”)
- Personal data received, created, maintained, transmitted, or otherwise processed by Bristlecone when providing its services to its customer other than Account-Related Information (“Customer Data”)
- Personal data from representatives of vendors, business partners, and other businesses with which we interact, or individuals doing business with Bristlecone
- Personal data of individuals attending our company events

We are the trusted partner in supply chain transformation. We specialize in helping organizations create higher-performing environments and deliver positive customer experiences. We empower businesses with the ability to forecast accurately, increase inventory turn, maximize savings, foster customer engagement and improve overall corporate health. We create certainty and unlock value.

1. What kind of personal data is collected and how is it used?

The table below summarizes the categories of personal data we collect from or about individuals (including California residents) within the last 12 months and the business and commercial purposes for which this personal data will be used and may have been used in the last 12 months. See the subsections cited below for additional details. Depending on the nature of your business relationship with Bristlecone, we may have collected and used any or all of these categories of personal data in the last 12 months.

We do not sell personal data in the ordinary course of business, and we do not “share” personal data with third parties for cross-context behavioral advertising. In addition, we have not sold or “shared” any personal data in the past 12 months.

Categories of Personal data	Purposes of Use
“Identifiers” such as a real name, alias, postal address, telephone number, online identifier, email address, and account name.	Responses to web and mobile app forms (e.g., visitors to our Site) and email and text messages: We use Identifiers to

Categories of Personal data	Purposes of Use
	<p>communicate with you, answer your inquiries, and provide requested services. See Section 2.1.</p> <ul style="list-style-type: none"> · Social media plugins: We receive Identifiers associated with your social media accounts when you use social media plugins. See Section 2.4 for more details. · Newsletter: We receive your name and email address when you subscribe to a newsletter. See Section 2.5 for more details. · Job applicants and potential contractors: We use your Identifiers to assist in the process of reviewing and evaluating your job application. See Section 2.6 and our Notice of Privacy Practice to Candidates for more details. · Some Customer Data may include Identifiers. We use Customer Data to facilitate providing our services and products. See Section 2.7 for more details. · Account-Related Information: We use Identifiers within Account-Related Information to provision and

Categories of Personal data	Purposes of Use	
	<p>manage customer accounts. See Section 2.8 for more details.</p> <ul style="list-style-type: none"> Identifiers of representatives of vendors, business partners, and joint marketers: We use Identifiers to facilitate our business relationship and transact with those entities. See Section 2.8 for more details. 	
Internet protocol address	<p>We collect truncated IP addresses from visitors to our Site to help analyze how users use the Site, unless they invoke the IP anonymization on the Site or opt out of the use of Google Analytics. However, these IP addresses are not personal data because they are anonymized and cannot show the precise location of any individual. See Section 2.2 for more details.</p>	
Information (other than Identifiers already described above) that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to:	Signature.	<p>We receive agreements, purchase orders, other forms, and communications bearing individuals' signatures. We use them to transact business with customers, vendors, and business partners.</p>
	Education, employment, and	<ul style="list-style-type: none"> We may collect company name and job title of contacts we do business with, such as

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Categories of Personal data	Purposes of Use
	<p>employment history.</p> <p>representatives of customers, vendors, and business partners.</p> <ul style="list-style-type: none"> We collect information about job applicants' and potential contractors' education, employment, and employment history when they submit job applications via the Site. See our Notice of Privacy Practice to Candidates for more details. Some Customer Data may include company name and job title. We use Customer Data to facilitate providing our services and products. See Section 2.7 for more details.
	<p>Bank account number, credit card number, debit card number, or any other financial information.</p> <p>We collect payment information from customers and vendor for our services, products, and events.</p>
<p>Commercial information, including records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> In connection with customer purchases from Bristlecone and Bristlecone's purchases from vendors, we keep records of services and products purchased,

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Categories of Personal data	Purposes of Use
	<p>obtained, or considered, and records of purchasing histories and tendencies for our accounting records and to manage our business more effectively.</p> <ul style="list-style-type: none"> · Some Customer Data may include commercial information of customers or their customers. We use Customer Data to facilitate providing our services and products. See Section 2.7 for more details.
<p>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding an individual's interaction with an Internet Web site, application, or advertisement.</p>	<ul style="list-style-type: none"> · We collect Internet or other electronic network activity information from Site visitors. Data automatically collected is non-personal data. See Sections 2.1-2.4 for more details. · Social media plugins: We receive Internet activity associated with your social media accounts when you use social media plugins. See Section 2.4 for more details.
<p>Geolocation data.</p>	<ul style="list-style-type: none"> · We collect IP addresses from visitors to our Site to help analyze how users use the Site, unless they invoke the IP anonymization on the Site or opt out of the use of Google Analytics. IP addresses tend to

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Categories of Personal data	Purposes of Use
	<p>show a user's location, although we use a feature to anonymize IP addresses. Therefore, they do not show the location of any individual user and IP address information is not personal data. See Section 2.2 for more details.</p>
<p>Audio, electronic, and visual information.</p> <ul style="list-style-type: none"> · We may collect testimonial, informational, and other video recordings and images of customer representatives. The video recordings also contain audio information. · Much of the other information in this in this table is in electronic form. 	<ul style="list-style-type: none"> · Video recordings (containing audio) and images are used for marketing purposes. · See the other sections of this table for purposes of use of the other personal data when it is in electronic form.
<p>Professional or employment-related information (e.g., job title and business contact information).</p>	<ul style="list-style-type: none"> · We may collect company name and job title of contacts we do business with, such as representatives of customers, vendors, and business partners. · We collect information about job applicants' and potential contractors' education, employment, and employment history when they submit job applications via the Site or applications for contractor positions. See our Notice of Privacy Practice to Candidates for more details.

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	<ul style="list-style-type: none"> Some Customer Data may include company name and job title. We use Customer Data to facilitate providing our services and products. See Section 2.7 for more details.
<p>Inferences drawn from other personal data described in this section reflecting individuals' preferences, characteristics, psychological trends, predispositions, behavior, abilities, or aptitudes.</p> <p>Our sales team may collect notes about these characteristics.</p>	<p>Our sales team may collect notes about these characteristics to assist in understanding our customers' needs and wishes in connection with marketing and selling our services and products.</p>
<p>Context-specific personal data not covered within the categories above.</p>	<p>When you use web forms, mobile app forms, email, text messages, other forms of electronic communications, or postal mail to communicate with us, that communication may contain personal data. We use that personal data to communicate with you, respond to your inquiries, or to further our business transactions and relationships with you.</p> <p>The BristleconeNEO® platform contains whatever data that customers upload to the platform. Some of the data uploaded to the platform may contain personal data. We process such personal data as a data processor for the</p>

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Categories of Personal data	Purposes of Use
	purpose of providing services to Bristlecone customers using theBristleconeNEO® platform. See Section 2.7 for more details.

Bristlecone does not collect or use any sensitive categories of personal data under GDPR.

If we collect your personal data for purposes covered in this policy and seek to use the personal data for a different purpose not covered by this policy, we will notify you and, where required, seek additional consent to use personal data for the other purpose.

2.1. Non-Personal and personal data collection by the Bristlecone Site

Whenever a user accesses the Bristlecone Site, the user’s Internet browser automatically transfers certain data to Bristlecone’s web server for technical and business reasons. This data is not personal data, as Bristlecone has no way to associate it with any individual user. The non-personal data collected automatically includes:

- IP address of the requesting computer
- date and time of access
- name and URL of the pages viewed
- the volume of data transmitted to the user
- whether the user was able to access the relevant page (file transferred, file not found, etc.)
- identification data of the user’s browser and operating system
- name of the user’s Internet service provider
- website from which access is made

This non-personal data is collected, processed, and used for the purpose of enabling the use of the website (connection setup), system security and technical administration of the network infrastructure. A comparison with other databases or a transfer to third parties, also in excerpts, does not take place.

The personal data collected via web or mobile app forms to communicate with Bristlecone or sent to us via email, text message, or other electronic communication will be used and processed exclusively for the purposes of responding to the communications and addressing any inquiries in them, as well as to carry out the services you may have requested.

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2.2. Use of Google Analytics and Cookies

This website uses Google Analytics, a web analytics service provided by Google LLC (“Google”). Google Analytics uses “cookies”, which consist of data placed on your computer, to help analyze how users use the Site. See Section 2.3.2 for more details about cookies. We use Google Analytics to collect information about the computer or mobile device you use to access the Site, such as the operating system and version, Flash version, Java support, screen settings, and location information based on your IP address. For a more detailed listing of information collected by Google Analytics, please refer to the article [here](#).

For users outside the USA, the information generated by cookies about your use of the Site is usually transferred to a Google server in the USA and stored there. However, if you activate the IP anonymization on the Site, your IP address will be shortened by Google prior to storage or processing. Only in exceptional cases the full IP address is transferred to a Google server in the USA and shortened there. Google will use Google Analytics information to evaluate your use of the Site, to compile reports on Site activity and to provide us with further services related to Site and Internet use. The IP address transmitted by your browser within the scope of Google Analytics will not be aggregated with other Google data.

You may refuse the use of cookies by selecting the appropriate settings on your browser. Nonetheless, please note that if you set your browser settings to refuse cookies, you may not be able to use the full functionality of this Site. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the Site (including your IP address) and from processing this data by downloading and installing the browser plug-in available under the following link <https://tools.google.com/dlpage/gaoptout>. You can prevent Google Analytics from collecting information from your computer by clicking on the following link. Clicking the link sets an opt-out cookie that prevents future collection of your information when you visit this Site: <https://tools.google.com/dlpage/gaoptout?hl=en>.

For more information on terms of use and privacy regarding Google Analytics, please visit <https://marketingplatform.google.com/about/analytics/terms/us/> or <https://policies.google.com/?hl=en-US>. Please note that on the Site, Google Analytics has been extended by the code “anonymizelp” to guarantee an anonymous registration of IP addresses (so-called IP masking).

The legal basis for processing under GDPR is legitimate interests under Article 6 paragraph 1(f), whereby Bristlecone’s authorization arises from the fact that, on the one hand, Bristlecone has an interest in evaluating the website data for purposes of website optimization and, on the other hand, a concerned person can reasonably foresee at the time when the personal data is collected and in view of the circumstances under which it is carried out (in particular the above-mentioned measures) that it will possibly be processed for this purpose.

2.3. Which cookies are used?

2.3.1. Cookies usage on our Site

We use cookies on our Site when users, click “Accept” on our cookie banner. By clicking “Accept,” you agree that cookies may be stored on your device. Accordingly, the legal basis for processing cookie data under GDPR is consent under Article 6 paragraph 1(a).

2.3.2. What are cookies? What types of cookies does Bristlecone use?

Cookies are fragments of data that Bristlecone places on your web browser during navigation to enable seamless access to our all our web pages on the Site. Cookies enable us to identify your device, secure your access, and prevent threats and breaches. Cookies also enable us to share relevant ads to you. By using cookies, we help remember your preferences and are able to serve you enhanced user experience every single time.

Session cookie – Session cookies remain only as long as a browsing session is active. They aid user convenience during browsing. These cookies allow websites to link the actions of a user during a browser session and expire at the end of the browsing session.

Persistent cookies are stored on a user’s device even after the end of a browsing session. They help in recalling the preferences or actions of the user. They are used to retain the visitor’s preferences such as language and regional preference(s) at the end of each browsing session. We may use services of a third-party analytics provider (Google) to analyze cookies to carry out a behavioral analysis in order to provide targeted and relevant content to visitors. See Section 2.2 for details.

Cookies are not accepted by default. Cookies are placed on your machine only if the user consents to them by clicking “Accepting” on the Site’s cookie banner.

You may change the settings of your browser to delete existing cookies or prevent future cookies from being automatically accepted. The cookie banner provides this functionality. However, if you disable cookies, certain parts and functions of our Site may not be available.

If you do not want to take advantage of our cookies, you can find out in the help function of your browser how to set your browser to prevent it from accepting new cookies or deleting existing cookies. There, you will also learn how to block new cookies from your browser or which browser settings to select in order to receive a notification of new cookies.

How can cookies help?

Cookies help us to recognize you when you visit the Bristlecone Site. Cookies remember your preferences, choices, and behaviors. Cookies position us to help you provide a personalized

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and a more customized experience that is in line with your settings. Cookies also make your interactions with Bristlecone's Site better, quicker, seamless, and secure.

2.4. Social media plugins

We use social media plugins from various social networks (e. g. Facebook, Twitter, and LinkedIn). With the help of these plugins, you can share content or recommend products. The plugins are deactivated by default and therefore do not send data to other websites.

If these plugins are activated, your browser establishes a direct connection with the servers of the respective social media network as soon as you access the Site. The content of the respective plugin is transmitted directly from the social media network to your browser and embedded into the Site.

By embedding the plugins, the social media network receives the information that you have visited certain Site pages. If you are logged in to the social media network, it can identify your account as having visited the Site. When you interact with the plugins, the corresponding information is transferred directly from your browser to the social media network and stored there.

For the purpose and scope of data collection and the further processing and use of the personal data by social media networks, as well as your rights and options for the protection of your privacy, please refer to the data protection notices of the respective social media networks.

If you do not want social media networks to collect information about you through our Site, you must log out of the social media networks or disable the social media plugins before you visit our Site.

Even if you are not logged in to social media networks, websites with active social media plugins can still send data to these networks. With an active plugin, a cookie with an identifier is placed each time the Site is accessed. Since your browser sends this cookie every time you connect to a network server without being asked, the network could use it to create a profile of the websites visited by the user associated with the ID. And it would then also be possible to assign this identifier to a person again at a later time – for example when logging on later to the social network.

We use the following plugins:

- Facebook (provided by Facebook Inc., 1 Hacker Way, Menlo Park, CA 94025 USA). You can view Facebook's privacy policy [here](#).
- LinkedIn (provided by LinkedIn Corp., 1000 West Maude Ave., Sunnyvale, CA 94085). You can view LinkedIn's privacy policy [here](#).
- X (formerly known as "Twitter," provided by X Corp., 1335 Market St., Suite 900, San Francisco, CA 94103, USA). You can view X's privacy policy [here](#).

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- Instagram (provided by Instagram Inc., 1 Hacker Way, Menlo Park, CA, 94025, USA). You can view Instagram's privacy policy [here](#).

2.5. Newsletters

2.5.1. Which personal data are collected and for what purpose are they processed?

If you register for a newsletter, we use your e-mail address to send you the newsletter for which you registered, in which we inform you regularly about interesting products and services of Bristlecone. The legal basis for registering you for a newsletter under GDPR is your consent in accordance with Article 6 paragraph 1(a). The legal basis under GDPR for our transmission of the newsletters you request after registration is performance of a contract in accordance with Article 6 paragraph 1(b) — providing the newsletter as agreed.

In order to ensure your proper registration for the newsletter, i.e., to prevent unauthorized registrations on behalf of third parties, we will send you a confirmation e-mail after your initial newsletter registration using the double opt-in procedure, in which we ask you to confirm your registration. In connection with your newsletter registration, we also store your registration data (e.g., e-mail address and the date and time of registration/confirmation of the opt in) so that we can trace and evidence the registration at a later time. The legal basis for this storage under GDPR is a legitimate interest, Article 6 paragraph 1(f). The legitimate interest is based on the obligation to provide proof of consent.

2.5.2. How long do we store your personal data?

We store your email address to send you the newsletter until you unsubscribe or until we stop sending you the newsletter. After unsubscribing from the newsletter, your registration data will be stored for up to 4 years, limited to the purpose of preserving evidence.

2.5.3. How can I cancel my newsletter subscription?

You can revoke your consent to receive newsletters from Bristlecone at any time in the future by clicking on the unsubscribe link at the end of a newsletter received.

2.6. What are your privacy practices regarding job candidates?

We place job postings on our website with the assistance of Oracle functionality linked from our Site. Job candidates can apply for a listed job on the Site and upload a cover letter and resume. We will collect whatever information job candidates provide to us using the Oracle functionalities. A more detailed privacy notice is provided to candidates for jobs and contractor positions when they seek work with Bristlecone. Our privacy notice to candidates appears on our website here.

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In accordance with India's Digital Personal Data Protection Act, 2023 (DPDPA), candidates acting as Data Principals have the right to:

- Access and confirm their personal data held by Bristlecone.
- Request correction or erasure of inaccurate or outdated personal data.
- Withdraw consent previously given for processing, where consent is the lawful basis.
- Raise grievances through our designated **Grievance Officer** at privacy@bristlecone.com.

Bristlecone processes candidate data only upon obtaining valid and clear consent, in alignment with DPDPA requirements, and retains such data only for as long as necessary to fulfill the hiring or engagement purpose.

For more information on Oracle's privacy practices, please refer to its privacy statement [here](#).

2.7. Bristlecone's Processing of Customer Data

While Bristlecone acts as a data "controller" under GDPR (referred to as a Data Fiduciary under India's DPDPA), it also acts as a "processor" (referred to as a Data Processor under both GDPR and DPDPA) when it receives Customer Data containing personal data from customers in connection with the use of Bristlecone's services. The roles and responsibilities of Bristlecone as a Data Fiduciary or Data Processor are determined by the nature of the data relationship and the purpose of processing, as defined under the applicable data protection law.

When Bristlecone receives personal data as a processor, it is the customer (or its customers) that have direct contact with the individuals whose personal data was uploaded to the services or other processes by Bristlecone. If a Bristlecone customer provided your personal data to Bristlecone in connection with the customer's relationship with you, the customer is the data "controller."

One example of a service that Bristlecone offers as a data processor is the Bristlecone NEO® platform. As a SaaS data platform, the Bristlecone NEO® platform hosts business data on behalf of Bristlecone's customers and therefore acts as a data processor. The platform, through various methodologies, provides for data ingestion from enterprise resource planning systems and other systems of records such as SAP, Salesforce, and Oracle.

The Bristlecone NEO® platform does not specifically require the ingestion of personal data from Bristlecone's customers or their employees, suppliers, contractors, partners, or any other parties associated with our customers. Rather, the Bristlecone NEO® platform processes whatever data that customers upload to the platform through specific business processes, workflows, and data pipelines implemented for the customers using the platform. Some of the data uploaded to the platform may contain personal data. We do not monitor or review the customer data that customers upload to the platform except, if and to the extent necessary, to verify that a customer

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is in compliance with its agreement with Bristlecone, to protect the security of Bristlecone's services, or in response to a customer's request to provide customer support.

Except as noted above, when processing such Customer Data, Bristlecone processes personal data within that Customer Data strictly in accordance with the actions of the applicable customer using Bristlecone's tools, queries, or instructions. Bristlecone has an obligation under its agreements with the customers not to disclose Customer Data to third parties, except to provide Bristlecone's services, as permitted in customer agreements, to follow our customer's instructions, as necessary in legal proceedings, or to comply with applicable law. Bristlecone may use third party data processors to assist in processing Customer Data and delivering its services to its customers.

2.8. Is other personal data collected and processed?

We collect and process Account-Related Information — personal data from representatives of our past, present, or prospective customers. For instance, we collect names and email addresses to identify these representatives. This Account-Related Information relates to customer accounts and their management. For example, Bristlecone collects contact information from such representatives to discuss sales of Bristlecone's services and to provision or manage user accounts when representatives of a customer use Bristlecone's services. We receive this Account-Related Information when the individual representatives provide it to us, and the basis for processing this personal data is consent.

At times, a representative of a customer may provide us with Account-Related Information of other representatives or contacts working for the customer. The basis for processing this personal data is legitimate interest. In specific, the interest of Bristlecone and the customer to create and maintain a business relationship is the interest justifying the processing of representatives' and contacts' personal data not provided by the representatives and contacts themselves.

In addition, we collect and process personal data from representatives of vendors, business partners, and other businesses with which we interact, or individuals doing business with Bristlecone. We also collect personal data from individuals attending our company events, such as webinars. Examples of uses for such personal data include:

- Communications with past, present, or future vendors of Bristlecone to discuss their products or services provided to Bristlecone
- Communications with past, present, or future business partners to discuss partnership arrangements with such entities
- Communications with representatives of those who market services in collaboration with Bristlecone.

We may process such personal data to fulfill our agreements with a business or if you have voluntarily given us your express consent. The legal bases for processing under GDPR are consent and performance of a contract under Article 6 Paragraphs 1(a) and 1(b).

Some individuals provide us with personal data, for example, by completing a registration form or sending us an email, ordering products or services, submitting inquiries to us, requesting materials or registering. Unless otherwise required by law, we will only use your personal data for the purposes for which you have given your consent. For special services such as newsletters, data protection provisions specific to those services will apply.

2.9. Minors

Our services and the Site are intended for use by adults 18 years and older. We do not market or sell services to minors or knowingly collect personal data from children under age 18. If you believe that we have inadvertently gathered personal data about a minor, please contact us as described in Section 10 below, so that we can delete it.

Note that social media companies are subject to the California online erasure law, California Business & Professions Code Section 22581. It allows minors who have posted information on social media or other online services on which they have an account to request and obtain removal of information posted by them. Minors wishing to exercise these rights concerning information posted on Bristlecone social media pages should contact the social media platform on which the posts appear. For additional assistance from Bristlecone in the removal process, please contact us as described in Section 10 below.

Despite a minor's rights under Section 22581, the law may not permit or require removal in all cases, and a request for removal is not a guarantee of complete removal.

3. Will my personal data be transferred to third parties?

We may share your personal data with vendors or outsource service providers that help us provide services to our customers, or that assist with support functions such as billing, payment card processing, and data analysis. Service providers may also be Bristlecone Group companies or service providers for IT services (e. g. for technical administrative tasks and for usage analysis), telecommunications, consulting, and advisory services as well as sales and marketing. They may process personal data on our behalf and therefore act as "processors" for purposes of GDPR. We will require any such vendors or service providers to manage your personal data with privacy and security safeguards consistent with this privacy policy.

When Bristlecone uses vendors or providers, Bristlecone remains responsible for the protection of your personal data. In addition, the processor may also be responsible. The service provider works strictly in accordance with our instructions. We oversee such vendors and providers with strict contractual requirements, technical and organizational safeguard measures, and supplementary controls.

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In line with the Digital Personal Data Protection Act (DPDPA) and the California Privacy Rights Act (CPRA), Bristlecone ensures that all data sharing and processing by vendors is limited to the specific purpose for which the personal data was originally collected. Each processing activity is supported by a valid lawful basis such as consent, contract performance, or legal obligation. Furthermore, individuals are provided with appropriate notice about such data sharing practices through our privacy policy and contractual disclosures.

For instance, the Bristlecone NEO® platform is designed, developed, and hosted on AWS Cloud. Moreover, Bristlecone enlists the services of third-party data processors such as OKTA, Tableau, GitHub, etc. to provide for a comprehensive solution to Bristlecone customers using the Bristlecone NEO® platform. In such cases, these third-party services then become sub-processors of Bristlecone supporting the Bristlecone NEO® platform.

From time to time, we may be required to respond to a subpoena, court order, search warrant, administrative or judicial process, requests by law enforcement or national security agencies, or other requests that we must respond to under applicable law. We may disclose your personal data in response to any of these requirements. Also, we may disclose your personal data to preserve the security of our Site, systems, or social media accounts, resolve disputes, or to assess any possible wrongdoing. The legal basis for processing under GDPR is compliance with a legal obligation (Article 6 Paragraph 1f).

Bristlecone Group Companies may share personal data among themselves for purposes of providing, supporting, maintaining, and administering the services it offers. Bristlecone may transfer your personal data to Bristlecone Group Companies in order to carry out a business relationship with you or for the purposes of legitimate interests.

If personal data of residents of member states of the European Union (“EU”) or European Economic Area (“EEA”), the United Kingdom, or Switzerland are exported, they will either be:

- Transferred to a country which, according to a decision of the relevant governmental entity of the country from which the personal data is exported (the European Commission, the UK Secretary of State, or the Swiss Federal Council as applicable) has an adequate level of data protection.
- In the case of data transfers to Bristlecone Group companies domiciled in other countries, transferred in a manner with assurances that the data-importing Bristlecone Group Company has been obligated to provide an adequate level of data protection consistent with this privacy policy and using a transfer mechanism permitted by applicable data protection law; or
- Transferred to a recipient using a transfer mechanism providing assurances that the importing entity that has been obligated to provide an adequate level of data protection consistent with this privacy policy and applicable data protection law.

For instance, when Bristlecone provides Bristlecone NEO® platform services, all data ingestion, transformation, and processing is covered by data processing addendum (DPA) with each

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customer. Bristlecone NEO® relies on the European Commission-approved Standard Contractual Clauses (“SCCs”) incorporated in a DPA as a legal mechanism for data transfers for its customer data that contains or may contain personal data to countries that have not received an adequacy decision from the European Commission from:

- A member state of the European Economic Area;
- The United Kingdom; or
- Switzerland.

In connection with cross-border personal data transfers from these countries, Bristlecone considers the possibility and likelihood of disclosures in response to governmental demands from countries into which personal data is imported pursuant to periodic transfer impact assessments to provide assurances of adequate levels of data protection.

We may share or transfer personal data about you in connection with a merger, acquisition, reorganization, or sale of assets of our business, in the event of bankruptcy, or during the negotiations leading to such an event. We will seek assurances from any buyer that your personal data will be used, shared, maintained, and disclosed consistent with the terms of this privacy policy.

Except as noted above, we do not transfer data to third parties unless you have given your express consent or the transfer is obviously necessary for the provision of an offer or service requested by you. We also do not intend to transfer your data beyond what is described above to a third country or international organization.

4. How long will my personal data be stored?

We store data for as long as it is legally necessary, for the time period to which you have consented, or as long as we have an ongoing relationship with you or your employer. In the case of customers, we will retain personal data associated with a customer’s account as long as necessary for the provision of the service requested by the customer (e.g., to manage a customer account or for the duration of one of our supply chain services or newsletter subscription). For vendors, business partners, and other businesses or individuals with which we interact, we will store personal data as long as necessary to maintain our business relationship.

In accordance with the Digital Personal Data Protection Act (DPDPA), Bristlecone ensures that personal data is not retained beyond the period required for processing purposes, unless required by law or contractual obligations. All personal data is reviewed periodically, and is deleted or anonymized upon the expiry of the purpose for which it was collected. The lawful basis for such retention includes contractual necessity, legal obligations, or consent, as applicable.

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In the case of customers and vendors of Bristlecone, the processing, storage, and use of personal data may in individual cases also extend beyond the duration of the provision of services. An example of this is the storage of the collected and processed personal data for the purpose of fulfilling post-contractual obligations, maintaining financial records, and exercising subsequent rights.

Data collected and processed on the basis of legitimate interests (under Article 6 paragraph 1(f) of GDPR) will be stored for as long as this is permitted on the basis of the legitimate interests.

In addition, we may have a legal obligation to preserve personal data in case of reasonably anticipated legal disputes or other preservation obligations under applicable law. For this category of personal data, the basis for processing is compliance with a legal obligation (under Article 6 paragraph (c) of GDPR).

5. Security Measures

Bristlecone maintains (and requires its service providers to maintain) an information security program establishing reasonable and appropriate information security controls over personal data. Bristlecone is committed to maintaining reasonable and appropriate industry-standard administrative, physical, and technical safeguards. In line with the Digital Personal Data Protection Act (DPDPA),

Bristlecone implements reasonable security practices and procedures, including but not limited to:

1. Provide assurances of the integrity and confidentiality of personal data covered by this privacy policy,
2. Data encryption at rest and in transit, access controls, role-based permissions, regular VAPT assessments, and secure coding practices.
3. Protect against reasonably anticipated threats or hazards to the security or integrity of personal data, and unauthorized uses or disclosures of such personal data, and
4. Maintain compliance with legal frameworks of requirements under applicable data protection laws.

These measures are designed to ensure confidentiality, integrity, and availability of personal data as required under DPDPA Section 8 and ISO 27001/27701 controls.

6. Do I have a right to information and rectification (correction) of my personal data? What other rights do I have with regard to my personal data?

You may at any time and free of charge request information about the scope, origin and recipients of collected personal data in our possession as well as the purpose of the storage. In

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addition, you have the right to rectification, erasure, or restriction of the processing of your personal data in accordance with applicable data protection laws, a right to object to the processing, and a right to data portability.

In accordance with the Digital Personal Data Protection Act, 2023 (DPDPA), individuals (referred to as Data Principals) have the right to:

- **Confirmation** whether Bristlecone is processing their personal data
- **Access** to their personal data being processed
- **Correction** of inaccurate or outdated personal data
- **Erasure** of personal data that is no longer necessary or upon withdrawal of consent
- **Grievance redressal** through Bristlecone’s designated Grievance Officer

7. California Privacy Rights

Bristlecone provides California residents with the rights in this policy, although these rights are not yet required under the California Consumer Protection Act (“CCPA”) as amended by the California Privacy Rights Act (“CPRA”). We offer these rights under this privacy policy so that representatives of customers and other businesses we transact with will have confidence that they are working with a business committed to excellence and protecting the data of business representatives. Nonetheless, our commitment to providing these rights is subject to any applicable contrary laws, rules, or law enforcement demands. (We used the term “personal information” in this section to refer to personal data because CCPA uses the term “personal information.”)

See Section 2 for categories of personal information Bristlecone collects from California residents. Bristlecone does not collect or use any sensitive personal information as defined in CPRA.

7.1. Right of Access to Information and Data Portability

Upon request, we will tell a California resident the categories and specific pieces of personal information we have collected about that resident in the previous 12 months. In addition, we will disclose to a California resident:

- The categories of personal information we have collected about that California resident.
- The categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting that California resident’s personal information.

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- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we have collected about that California resident.

The identity of any person making such a request must be verified as a condition of providing the requested personal information. See Section 7.7 regarding identification verification procedures.

7.2. Right of Deletion

You may request that we delete any of your personal information that we collected from you and retained by us, subject to certain conditions and exceptions under applicable law. For instance, we have the right to retain personal information needed to:

- Complete the transaction for which the personal information was collected, provide a good or service requested by the California resident, or reasonably anticipated within the context of our ongoing business relationship with the California resident, or otherwise perform a contract between our business and the California resident.
- Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
- Conduct solely internal uses that are reasonably aligned with the expectations of the California resident based on the California resident's relationship with us.
- Comply with a legal obligation.
- Use the personal information internally, in a lawful manner that is compatible with the context in which the California resident provided it.

The identity of any person making such a request must be verified as a condition of deleting the personal information as requested. See Section 7.6 regarding deleting the information and 7.7 regarding identification verification procedures.

7.3. Right of Correction

Bristlecone will employ reasonable means to keep personal information described in this notice accurate, complete, up-to-date, and reliable for its intended use. Bristlecone, however, may not give California residents the ability to correct personal information where the burden or expense of doing so is disproportionate to the risks to their privacy or benefits to them in a particular case. If Bristlecone does not offer to correct personal information of a California resident to certain personal information, it will give specific reasons for refusing to do so and provide a contact point to discuss these reasons. Please be aware that applicable law may permit or require Bristlecone to preserve some of your personal information as it is presently stored in our systems.

The identity of any person making such a request must be verified as a condition of correcting the personal information as requested. See Section 7.7 regarding identification verification procedures.

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7.4. No Sale or “Sharing” of Personal Information

Bristlecone does not sell personal information in its possession in the ordinary course of business and has not done so in the preceding 12 months. See Section 3 regarding the sale of personal information in connection with corporate transactions. In addition, Bristlecone does not “share” personal information within the meaning of the California Privacy Rights Act (communicating personal information to a third party for cross-context behavioral advertising).

7.5. Non-Discrimination

It is our policy not to discriminate against individual California residents for exercising any of their rights under this privacy policy or applicable law, including by:

- Denying goods or services to the California resident.
- Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.
- Providing a different level or quality of goods or services; or
- Suggesting that the California resident will receive a different price or rate for goods or services or a different level or quality of goods or services.

7.6. Exercise of Individual Rights

You may contact us at privacy@Bristlecone.com with your requests. Bristlecone shall respond to your request within a reasonable period, but at the latest within one month, in-case we receive too many requests from you, or your request is too complex, our response to your request may get extended further, up-to two months or within the permissible extension allowed by the relevant data protection law.

If you are a California resident and wish to exercise any of the rights described in this Section 7, please contact us in the manner described in Section 10. If you are an agent authorized to act on behalf of a California resident, we will need proof of your authority from the California resident and you will identify yourself and the California resident on whose behalf you are acting. We will use the procedures in Section 7.7 to verify the identity of the California resident and/or an authorized agent.

In accordance with Section 8(3) of the Digital Personal Data Protection Act, 2023 (DPDPA), if you are not satisfied with our response or resolution to your request, you may escalate the matter to the Data Protection Board of India via the official grievance channel once operational. We will share relevant contact details and procedures as they are published by the Board.

7.7. Identity Verification

Bristlecone will verify the identity of any individual or authorized agent seeking to exercise rights under this privacy policy. We will verify the identity of California residents and their agents using one or more of the following means:

- For California residents with a password-protected account with Bristlecone, we can verify an identity by proof of access to the account.
- For California residents without a password-protected account, we will identify a requestor via pieces of personal information that we have on record.
 - We will require that you provide two pieces of information that we already have on file for you, such as items of contact information and/or information from communications or transactions with you.
 - Also, in the case of a request for specific pieces of personal information, we will ask for an additional piece of information in addition to the two pieces requested above, together with a signed declaration under penalty of perjury that the requestor is the California resident, or authorized agent acting on behalf of a California resident, whose personal information is the subject of the request.
- If we are unable to verify identity by one of the above means or have reason to believe the request may be fraudulent, we may ask you to provide a copy of an identification credential.

An authorized agent seeking to exercise rights on behalf of an individual California resident must prove the agent's authority by providing a power of attorney under the California Probate Code or some or all of the following:

- Providing a copy of a writing signed by the California resident giving the agent permission to act on the California resident's behalf;
- Verification of the California resident's and the authorized agent's own identity under the procedures in this section; or
- Communicating with the California resident directly to confirm the status of the agent as authorized to act on behalf of the California resident.

If we are unable to verify the identity of the requestor and the authority of any authorized agent acting on behalf of a California resident, we will not be able to respond to the request to exercise individual rights.

We may ask for additional verification if we suspect fraud, such as a copy of an identification credential from the requestor.

We will use any information collected in connection with identity verification (beyond what Bristlecone had already collected as otherwise described in this policy) strictly for identity

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verification purposes, and it will be deleted following the completion of the verification process (except to the extent Bristlecone is required to retain such information under CCPA or other applicable law).

8. Can I withdraw my consent to the use of my personal data?

Where consent was the basis for our collecting your personal data, you have the right to withdraw your consent to the use of your personal data at any time. To exercise this right, please send an email to privacy@Bristlecone.com or send a letter to the following address:

(Bristlecone, San Jose, 10 Almaden Blvd, Suite 990, San Jose, CA 95113)

You may also call use toll-free at (888) 807-4599.

The data processing performed on the basis of your consent is legal until the time of withdrawal.

9. Do Not Track Signals

Browser software manufacturers may offer “do not track” (DNT) settings to allow users to communicate a privacy preference. However, there is currently no universally accepted standard governing how website operators should respond to such signals.

In line with this, and in accordance with India’s Digital Personal Data Protection Act, 2023 (DPDPA) — which does not currently require recognition of DNT signals — Bristlecone does not act on DNT browser settings at this time. We will continue to monitor regulatory developments in India and globally, and may revise this approach if a clear legal or technical standard is adopted.

10. Who is a contact person I can talk to if I have questions about Bristlecone’s data protection practices?

If you have any questions or comments or wish to exercise any of your individual rights described in this privacy policy, please feel free to contact Bristlecone’s data protection officer at any time at privacy@bristlecone.com. You may also call use toll-free at (888) 807-4599. Finally, you may send a letter to contact us at the following address:

Bristlecone, San Jose, 10 Almaden Blvd, Suite 990, San Jose, CA 95113

11. What should I do if I have a complaint about Bristlecone’s privacy practices?

If you have a complaint, please provide information relevant to your complaint by contacting us as described in the previous section. Our privacy team will evaluate your complaint based on the information you provide and send you a response. We may need to ask you for additional
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information to evaluate your complaint. We will promptly investigate and respond to your communications about a complaint. You may have other rights under law. Also, you have the right to contact the privacy regulator in your country or jurisdiction about your complaint.

12. **Date of privacy policy and amendments**

This data privacy policy is up to date as of the date set forth at the beginning of this privacy policy. We reserve the right to amend the data privacy declaration at any time, and the terms of any amendments will have effect on and after the effective date of the amendment.

We will make changes by posting a revised copy of this privacy declaration to our website or, if Bristlecone deems it necessary, by email notice to you. Your continued use of our website and social media accounts after a revised version of this privacy declaration appears on the website will constitute your approval of the amended version.

End of Document