

# dbt cloud Privacy Policy

## 1. OUR APPROACH TO PRIVACY

1. dbt Labs, Inc. (“dbt Labs”, “we”, “our”, or “us”) is strongly committed to protecting and respecting your privacy. This privacy policy sets out how we collect, store, process, transfer, share and use data that identifies or is associated with you (“personal information”) and information regarding our use of cookies and similar technologies.
2. dbt Labs operates a platform for modelling data that specifically allows users to transform data within a data warehouse that they own and operate, which we make available as a service using our website and web application at <https://cloud.getdbt.com> (the “Service”).
3. This privacy policy applies to our Service. Terms used in this privacy policy have the same meaning as in our Terms of Service, unless otherwise defined in this privacy policy.
4. Before accessing or using our Service, please ensure that you have read and understood our collection, storage, use and disclosure of your personal information as described in this privacy policy.
5. dbt Labs is the data controller of the personal information we hold about you.

## 2. PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

1. We collect personal information about you when you voluntarily submit information directly to us when you use our Service. This can include information you provide to us when you register for an account, fill in a form on our Service, create or edit your user profile on the Service, correspond with us by phone, e- mail or otherwise, subscribe to our mailing lists, newsletters or other forms of marketing communications, respond to a survey, enter a promotion or use some other feature of our Service. We may also collect personal information from third parties, such as data enrichment services.
2. If you choose not to provide personal information, we may not be able to provide the Service to you or respond to your other requests.
3. The table at Annex 1 sets out the categories of personal information we collect about you and how we use that information. The table also lists the legal basis which we rely on to process the personal information, the categories of recipients of the personal information and information as to how we determine applicable retention periods.
4. We also automatically collect personal information about you indirectly about how you access and use the Service and information about the device you use to access the Service.
5. The table at Annex 2 sets out the categories of personal information we collect about you automatically and how we use that information. The table also lists the legal basis which we rely on to process the personal information, the categories of recipients of the personal information and information as to how we determine applicable retention periods.
6. We may link or combine the personal information we collect about you and the information we collect automatically. This allows us to provide you with a personalised experience regardless of how you interact with us.
7. We may anonymise and aggregate any of the personal information we collect (so that it does not directly identify you). We may use anonymised information for purposes that include testing our IT systems, research, data analysis, improving our Service and developing new products and features. We may also share such anonymised information with others.

### 3. MARKETING AND ADVERTISING

From time to time we may contact you with information about our products and services. Most marketing messages we send will be by email. For some marketing messages, we may use personal information we collect about you to help us determine the most relevant marketing information to share with you. If you do not want to receive marketing messages from us, you will be able to tell us by selecting certain boxes on forms we use when we first collect your contact details. You can also change your marketing preferences at a later date by clicking on the unsubscribe link at the bottom of our marketing emails or logging into your account on our website and changing your preferences.

### 4. STORING AND TRANSFERRING YOUR PERSONAL INFORMATION

#### 1. *Security*

We implement appropriate technical and organisational measures to protect your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect will be stored on our secure servers. All electronic transactions entered into via our website will be protected by SSL encryption technology. We will never send you unsolicited emails or contact you by phone requesting your account ID, password, credit or debit card information or national identification numbers.

#### 2. *International Transfers of your Personal Information*

As we are located in the USA, any information you provide will initially be collected and stored in the USA. If you are in the EU or EEA, UK, or Switzerland, this may mean that your personal information will be stored in a jurisdiction that offers a level of protection that may, in certain instances, be less protective of your personal information than the jurisdiction you are typically resident in.

3. If you wish to enquire further about the safeguards we use, please contact us using the details set out at the end of this privacy policy.
4. We will take reasonable steps to ensure that your personal information is treated securely and in accordance with applicable law and this privacy policy.

### 5. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL INFORMATION

1. In accordance with European Union privacy law, you have the following rights in respect of your personal information that we hold:

- Right of access
- The right to obtain access to your personal information.
- Right to rectification

The right to obtain rectification of your personal information without undue delay where that personal information is inaccurate or incomplete.

- Right to erasure

The right to obtain the erasure of your personal information without undue delay in certain circumstances, such as where the personal information is no longer necessary in relation to the purposes for which it was collected or processed.

- Right to restriction

The right to obtain the restriction of the processing undertaken by us on your personal information in certain circumstances, such as where the accuracy of the personal

information is contested by you, for a period enabling us to verify the accuracy of that personal information.

2. If you wish to exercise one of these rights, please contact us using the contact details at the end of this privacy policy. You may also review and edit the personal information you have submitted to us by logging into your account on our website. You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## 6. JURISDICTION AND ENFORCEMENT

1. dbt Labs participates in and has certified its compliance with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, the United Kingdom, and Switzerland to the United States in reliance on Privacy Shield. We have certified that the company adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.
2. Pursuant to the Privacy Shield Frameworks, EU, UK, and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. You may also request access and erasure of information we hold about you, consistent with your rights above. We will provide an individual opt-out choice, or opt-in for sensitive data, before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized.
3. dbt Labs is responsible for the processing of personal data it receives under each Privacy Shield Framework and subsequently transfers to a third party acting as an agent on its behalf. dbt Labs complies with the Privacy Shield Principles for all onward transfers of personal data from the EU, the United Kingdom, and Switzerland, including the onward transfer liability provisions.
4. With respect to personal data received or transferred pursuant to the Privacy Shield Framework, dbt Labs is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, dbt Labs may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
5. In compliance with the EU-US and Swiss-US Privacy Shield Principles, we commit to resolve complaints about your privacy and our collection or use of your personal information. European Union, United Kingdom, or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact us using the contact information listed below.
6. We have further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/privacy-shield-complaints/> for more information and to file a complaint. This service is provided free of charge to you.
7. If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other

redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>

## 7. COOKIES AND SIMILAR TECHNOLOGIES

1. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.
2. Cookies are pieces of code that allow for personalisation of our website experience by saving your information such as user ID and other preferences. A cookie is a small data file that we transfer to your computer's hard disk for record-keeping purposes.
3. We use the following types of cookies
  - Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, or make use of e-billing services.
  - Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
  - Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
  - 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 to make our website and the advertising displayed on it, and the marketing messages we send to you more relevant to your interests. We may also share this information with third parties who provide a service to us for this purpose.
  - Third party cookies. Please be aware that advertisers and other third parties may use their own cookies tags when you click on an advertisement or link on our website. These third parties are responsible for setting out their own cookie and privacy policies.
4. Annex 3 contains more information about the cookies we use and how long they remain on your device.
5. The cookies we use are designed to help you get the most from the website but if you do not wish to receive cookies, most browsers allow you to change your cookie settings. Please note that if you choose to refuse cookies you may not be able to use the full functionality of our website. These settings will typically be found in the "options" or "preferences" menu of your browser. In order to understand these settings, the following links may be helpful, otherwise you should use the "Help" option in your browser for more details.
  - Cookie settings in Internet Explorer <https://support.microsoft.com/en-us/products/windows>
  - Cookie settings in Firefox <http://support.mozilla.org/en-US/kb/cookies>
  - Cookie settings in Chrome <https://support.google.com/chrome/answer/95647?hl=en>
  - Cookie settings in Safari on the web [https://support.apple.com/kb/PH5042?locale=en\\_GB](https://support.apple.com/kb/PH5042?locale=en_GB) and iOS <https://support.apple.com/en-gb/HT201265>

6. If you only want to limit third party advertising cookies, you can turn such cookies off by visiting the following links (please bear in mind that there are many more companies listed on these sites than those that drop cookies via our website):
  - o Your Online Choices <http://www.youronlinechoices.com/>
  - o Network Advertising Initiative <http://www.networkadvertising.org/>
  - o Digital Advertising Alliance <http://www.aboutads.info/consumers/>

## 8. LINKS TO THIRD PARTY SITES

Our Service may, from time to time, contain links to and from third party websites, including those of other users, our partner networks, advertisers, partner merchants, news publications, retailers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for their policies. Please check the individual policies before you submit any information to those websites.

## 9. OUR POLICY TOWARDS CHILDREN

Our Service is not directed at persons under 16 and we do not knowingly collect personal information from children under 16. If you become aware that your child has provided us with personal information, without your consent, then please contact us using the details below so that we can take steps to remove such information and terminate any account your child has created with us.

## 10. CHANGES TO THIS POLICY

We may update this privacy policy from time to time and so you should review this page periodically. When we change this privacy policy in a material way, we will update the “last modified” date at the end of this privacy policy. Changes to this privacy policy are effective when they are posted on this page.

## 11. NOTICE TO YOU

If we need to provide you with information about something, whether for legal, marketing or other business related purposes, we will select what we believe is the best way to get in contact with you. We will usually do this through email or by placing a notice on our Service. The fact that we may send notices to you will not stop you from being able to opt out of certain types of contact as described in this privacy policy.

## 12. CONTACTING US

1. Questions, comments and requests regarding this Privacy Policy are welcome and should be sent to [privacy@dbtlabs.com](mailto:privacy@dbtlabs.com).
2. This privacy policy was last modified on June 30, 2021.

## ANNEX 1 - PERSONAL INFORMATION WE COLLECT

Category of personal information	How we use it	Legal basis for the processing	Categories of recipients	Retention period
<p><b>Contact and profile information.</b> Personal information, such as your name, address, email address and company name.</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>- Operate, maintain and provide to you the features and functionality of the Service.</li> <li>- Communicate with you including sending statements and invoices, service-related communications and marketing communications.</li> <li>- Deal with enquiries and complaints made by or about you relating to the Service.</li> </ul>	<p>The processing is necessary for:</p> <ul style="list-style-type: none"> <li>- The performance of a contract and to take steps prior to entering into a contract; and</li> <li>- Our legitimate interests, namely administering the Service, for marketing purposes and communicating with users</li> </ul>	<p><i>As required in accordance with how we use it, we will share your personal information with the following:</i></p> <p><b>Service providers and advisors.</b> Third party vendors and other service providers that perform services for us, on our behalf, which may include identifying and serving targeted advertisements, providing mailing, email or chat services, tax and accounting services, payment processing, data enhancement services, fraud prevention, web hosting, or providing analytic services.</p>	<p>For no longer than necessary for the purposes set out and in accordance with our legal obligations and legitimate business interests</p>
<p><b>Comments, chat and opinions.</b> When you contact us directly, e.g. by email, phone or by completing an online form or participating in online chat, we will record your comments and opinions.</p>	<p>To address your questions, issues and concerns and improve our Service, to determine products and services that may be of interest to you and to send you marketing communications in accordance with your marketing preferences.</p>	<p>The processing is necessary for our legitimate interests, namely communicating with users, developing and improving our Service and for marketing purposes.</p>	<p><b>Purchasers and third parties in connection with a business transaction.</b> Personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.</p>	
<p><b>Payment and transaction information.</b> Information such as the service level purchased, date and time of your transaction, and payment information, such as your credit card or bank account details.</p>	<p>To facilitate transactions, detect and prevent fraud and inform our advertising and marketing.</p>	<p>The processing is necessary for:</p> <ul style="list-style-type: none"> <li>- The performance of a contract;</li> <li>- Our legitimate interests, namely the detection and prevention of fraud and for marketing purposes.</li> </ul>	<p><b>Law enforcement, regulators and other parties for legal reasons.</b> Third parties as required by law or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) enforce our Terms of Use or to protect the security or integrity of our Service; and/or (c) exercise or protect the rights, property, or personal safety of dbt Labs, our users or others.</p>	
<p><b>Preferences.</b> Preferences set for notifications, marketing communications, how our website is displayed and how you use the Service.</p>	<p>We use this information to provide notifications, send marketing communications and display our Service in accordance with your choices.</p>	<p>The processing is necessary for:</p> <ul style="list-style-type: none"> <li>- Our legitimate interest, namely ensuring the user receives the correct marketing and other communications; and</li> <li>- The performance of a contract.</li> </ul>		
<p><b>Information provided by third parties.</b> From time to time, we may receive information about you from third parties and other users. We may obtain information from third parties to enhance or supplement our existing user information. We may also collect information about you that is publicly available.</p>	<p>We may combine this information with the information we collect from you directly. We use this information to contact you, to send you advertising or promotional materials or to personalise our Service, to pre-populate online forms, and to better understand the demographics of our users.</p>	<p>The processing is necessary for our legitimate interests, namely to tailor our service to the user and improve our service generally.</p>		
<p><b>All personal information set out above.</b></p>	<p>We will use all the personal information we collect to operate, maintain and provide you the features and functionality of the Service, to communicate with you, to monitor and improve our Service and business, and to help us develop new products and services.</p>	<p>The processing is necessary for our legitimate interest, namely to administer and improve the Service.</p>		

## ANNEX 2 - PERSONAL INFORMATION COLLECTED AUTOMATICALLY

Category of personal information	How we use it	Legal basis for the processing	Categories of recipients	Retention period
<p><b>Information about how you access and use the Service.</b> For example, the website from which you came and the website to which you are going when you leave our website, how frequently you access the Service, the time you access our Service and how long you use it for, the approximate location that you access the Service from, whether you access the Service from multiple devices, and other actions you take on the Service.</p> <p><b>Information about your device.</b> We also collect information about the computer, tablet, smartphone or other electronic device you use to connect to our Service. This information can include details about the type of device, unique device identifying numbers, operating systems, browsers and applications connected to our service through the device, your internet service provider or mobile network, your IP address and your device's telephone number (if it has one).</p> <p>We use information about how you use and connect to our Service to present our Service to you on your device and to determine the products and services that may be of interest to you for marketing purposes.</p>	<p>We use the information to:</p> <ul style="list-style-type: none"> <li>- Present our Service to you on your device;</li> <li>- Determine the products and services that may be of interest to you for marketing purposes; and</li> <li>- Monitor and improve our Service and business, and to help us develop new products and services.</li> </ul>	<p>The processing is necessary for our legitimate interests, namely: to tailor our Service to the user and to improve our Service generally; to monitor and resolve issues; for marketing purposes; to communicate with users; to contact users; and for the detection and prevention of fraud.</p>	<p><i>As required in accordance with how we use it, we will share your personal information with the following:</i></p> <p><b>Service providers and advisors.</b> Third party vendors and other service providers that perform services for us, on our behalf, which may include identifying and serving targeted advertisements, providing mailing or email services, tax and accounting services, payment processing, data enhancement services, fraud prevention, web hosting, or providing analytic services.</p> <p><b>Purchasers and third parties in connection with a business transaction.</b> Personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.</p> <p><b>Legal enforcement, regulators and other parties for legal reasons.</b> Third parties as required by law or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Use or to protect the security or integrity of our Service' and/or (c) to exercise or protect the rights, property or personal safety of dbt Labs, our users or others.</p>	<p>For no longer than necessary for the purposes set out and in accordance with our legal obligations and legitimate business interests</p>



### ANNEX 3 - COOKIES

Cookie Name	Party setting cookie	When will the cookie expire?	When is the cookie set?	How the information collected by the cookies is used
snwplw	dbt Labs	1 year	When you first visit our website	We use Snowplow Analytics to: <ul style="list-style-type: none"> <li>- monitor and analyze how users use our website and our Service, in order to better understand how users interact with our website and our Service</li> <li>- recognise you and link the devices you use when you visit our website or user our Service</li> </ul>
_sp_id.6def	dbt Labs	2 years	When you first visit our website	
_sp_ses.6def	dbt Labs	30 minutes	When you first visit our website	
sessionid	dbt Labs	2 weeks	When you first visit our website	This cookie is used for authentication purposes within our Service.
intercom-id- tx2p130c	Intercom	20 years	When you first visit our website	Intercom is a support chat application which is integrated into our Service. This cookie keeps track of intercom users in order to connect them back to past conversations if they leave the page and come back, by providing an ID number that Intercom associates with the ID visitor.
ajs_anonymous_id	Elevio	10 months	When you first visit our website	Elevio is a customer support resource which is integrated into our Service. This cookie keeps track of Elevio users so that interactions with the Elevio service can persist across support sessions.
lc.visitor_id.701 6401	Stripe	2 years	When you first visit our website	Stripe is a payment processing service which is integrated into our Service. This cookie keeps track of users between sessions for operational uses including, but not limited to, fraud prevention.