

## GOVERNMENT DATA REQUEST POLICY

### Introduction

This Government Data Request Policy sets out the procedure that Treasure Data, Inc. and its subsidiaries (collectively and each of them, “**Treasure Data**”) follow for responding to a subpoena, Court order or other request received from a law enforcement or other government authority (together the “**Requesting Authority**”) to disclose personal data processed by Treasure Data on behalf of its Customers (hereafter “**Data Disclosure Request**”).

Where Treasure Data receives a Data Disclosure Request, it will handle that Data Disclosure Request in accordance with this Policy.

### General principles on Data Disclosure Requests

As a general principle, Treasure Data does not disclose personal data in response to a Data Disclosure Request unless it is under a compelling legal obligation to make such disclosure.

Treasure Data does not voluntarily permit any Requesting Authority to access personal data processed by Treasure Data on behalf of its Customers.

### Handling of a Data Disclosure Request

If Treasure Data receives a request from a Requesting Authority, the individual recipient of the request shall not respond or otherwise communicate with the requester. Rather, the recipient must pass the request to Treasure Data’s Chief Legal Officer, General Counsel and Privacy Team (collectively, the “**Privacy Team**”) immediately upon receipt by emailing [privacy-compliance@treasure-data.com](mailto:privacy-compliance@treasure-data.com). The recipient should also indicate the date on which the request was received together with any other information that may assist the Privacy Team to review and respond to the request.

The Requesting Authority’s request does not have to be made in writing, made under a Court order, or mention data protection law to qualify as a Data Disclosure Request. For example, a Data Disclosure Request may include a request made during the course of a phone conversation or delivered by e-mail. Any request, however made, that could be a Data Disclosure Request must be notified to the Privacy Team for review.

Treasure Data’s Privacy Team will carefully review each and every Data Disclosure Request on a case-by-case basis. The Privacy Team will liaise with the legal department and outside counsel as appropriate to deal with the request in order to: (i) determine the nature, context, purposes, scope and urgency of the Data Disclosure Request and its validity under applicable laws; (ii) identify whether action may be needed to challenge the Data Disclosure Request and/or to notify the Customer and/or competent data protection authority(ies); (iii) identify any contractual obligations binding upon Treasure Data in respect of any such request.

Treasure Data will challenge any Data Disclosure Request directed to it where, after careful assessment, it concludes that there are reasonable grounds to consider that it is unlawful. If

Treasure Data remains compelled to fulfill the request, Treasure Data will disclose the minimum amount of data that it determines, on advice of counsel, necessary to satisfy it.

### **Notice of a Data Disclosure Request to Customers**

If a request concerns personal data that Treasure Data processes on behalf of a Customer who is the controller in respect of that data, Treasure Data will ordinarily ask the Requesting Authority to make the Data Disclosure Request directly to the Customer. If the Requesting Authority agrees, Treasure Data will support the Customer in accordance with the terms of its contract to respond to the Data Disclosure Request.

If this is not possible (for example, because the Requesting Authority declines to make the Data Disclosure Request directly to the Customer or does not know the Customer's identity), Treasure Data will notify and provide the Customer with the details of the Data Disclosure Request prior to disclosing any personal data, unless legally prohibited from doing so.

Where Treasure Data is prohibited from notifying the Customer, Treasure Data will use reasonable efforts to obtain the right to waive this prohibition. Such efforts may include asking the Requesting Authority to allow disclosure to specified personnel at Treasure Data's Customer, and may also, in appropriate circumstances, include seeking a court order to this effect. Treasure Data will maintain a written record of the efforts it takes.

### **Transparency reports**

Treasure Data commits to preparing a semi-annual report (a "**Transparency Report**"), which reflects the number and type of Data Disclosure Requests it has received from a US Requesting Authority for the preceding six months (as may be limited by applicable law or court order) in respect of personal data processed by Treasure Data on behalf of Customers. Treasure Data will publish the Transparency Report on its website or make the report otherwise available upon request to Customers, prospects and competent data protection authorities.

### **Questions**

Questions about this policy should be directed to the Chief Legal Officer or General Counsel.