Calendly

Calendly Privacy White Paper

Version 2.0 - February 2024

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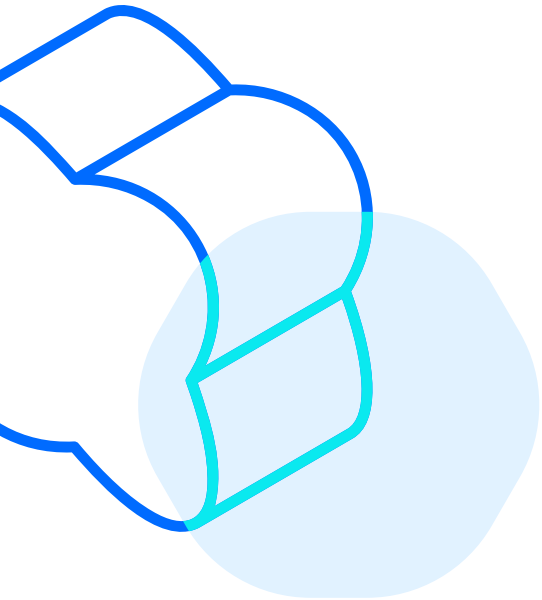


Introduction

Calendly's mission is to help you schedule better. To do so, we need some personal information to make your meetings happen. We don't take this responsibility lightly. We recognize the importance of privacy and we want you to feel confident about using Calendly services and in your interactions with us.

This Privacy White Paper is designed to provide insight on how we collect, use, store, and protect personal information from you and your invitees through the use of the Calendly service. It will also provide an overview of our privacy program practices, including information about regulatory compliance, international data transfers, sub-processors, data subject rights, and other relevant privacy topics - all in one place.

Whether you are an existing Calendly customer or a prospect interested in our service, we hope that this Privacy White Paper serves as a valuable resource for you and answers the questions you may have about our stance and actions regarding privacy and regulatory compliance.

This Privacy White Paper is intended to supplement existing Calendly-issued privacy documentation for informational purposes only. It is not intended to provide legal advice or to address all circumstances that might arise. It does not create additional rights or remedies and should not be construed as a binding agreement. We will update this Privacy White Paper from time to time as necessary to reflect changes in our practices, services, and laws and regulations.

If you still have questions for our Privacy Team after reviewing this Privacy White Paper, please email privacy@calendly.com.

Types of Personal Information, Data Protection Roles and Purposes of Processing

For the purposes of this document, personal information is any information relating to an identified or identifiable person. The following sections provide more detail on the types of personal information that may be processed, data processing roles, and the purposes of processing in your interactions with Calendly.

Calendly as a Data Processor

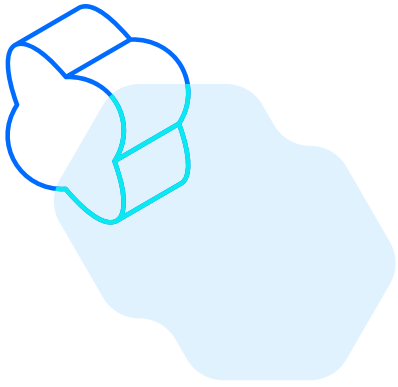
The Calendly as a Data Processor use case involves the processing by Calendly of personal information submitted by or collected by you and/or your users, or any similar actions on your behalf, for the provision of the Calendly service. The personal information we collect may include, but is not limited to:

- Names and email addresses of users and invitees
- User-related information and preferences such as title/position, department, employer, other contact information such as phone number and physical business address, timezone, preferred language, preferred working hours, and calendar availability (i.e., busy/free status)
- Event details of meetings you schedule using Calendly such as subject and title of meeting, description, and meeting preferences (e.g., Zoom, Google Meet, phone call, etc.)
- Certain personal information from the events on your connected Calendly if you use our calendar integration

Calendly is not intended to be used to collect sensitive personal information from invitees. In addition, name and email address is the only personal information needed about invitees in order to schedule a meeting. Users have the ability to customize and add certain fields to your events to gather additional information such as payment information or other types of information needed to schedule the meeting based on their needs. These additional functionalities, however, are not required fields for the Calendly service to work, and will only be activated and customized at your discretion.

Calendly is the data processor (as the term is defined in the General Data Protection Regulation or "GDPR" or applicable law in Europe, the United Kingdom, or applicable states in the United States) **and the service provider** (as the term is defined in the California Consumer Privacy Act and its amendments, collectively, the "CCPA") of the personal information processed for service delivery.
Calendly may use such personal information when permitted by applicable law for the following purposes:

- Provide, improve, and update the service
- Respond to any of your support-related inquiries or questions about the service
- Process any privacy-related request from you such as data deletion, data access or other legally required actions directed by you
- Resolve issues related to the service, including any downtime, bugs or service errors
- Assist with information security measures, and the prevention, detection, and investigation of spam, fraud, and abuse
- Carry out instructions that are explicitly authorized by you or your authorized agent



Calendly as a Data Controller

The Calendly as a Data Controller use case involves the personal information we need to protect and manage our business and account level information. The types of personal information could include, but are not limited to:

- Account and billing details
- Customer relationship management (CRM) data about you
- Platform metrics
- Platform security log data and certain cookie-derived information

Calendly is the data controller (as the term is defined in the GDPR or applicable law in Europe, the United Kingdom, or applicable states in the United States) **and the business** (as the term is defined in the CCPA) for the types of personal information listed in this section only for the purposes listed below:

- Understand and improve the Calendly service either via product research and development or improving performance or functionality
- Secure and protect the service and the data within it
- Detect, prevent, and protect the platform from abuse including spam and violations of our terms of use
- Communicate with you regarding the service, including product-related updates or security and fraud notices
- Manage your business account with us
- Protect Calendly's rights and interests
- Perform internal reporting including forecasting and financial analysis
- Manage legal compliance and disputes
- Administer actions related to mergers and acquisitions

Our Privacy Notice further describes our data collection and processing practices regarding your personal information.

Regulatory Compliance

Calendly is a market-leading scheduling solution. As a result, we serve customers all over the world who also have their own complex privacy compliance obligations. We are committed to taking the necessary steps to comply with relevant privacy laws and regulations, including the GDPR, the CCPA, PIPEDA, the Privacy Act (Australia), and many others. We have implemented policies and procedures to comply with the many common elements of these applicable laws, and we regularly review our privacy practices so that we are up-to-date with the latest regulations.

Here are some examples of the regular activities and responsibilities managed by our dedicated Privacy Team:

- Conducting periodic reviews and updates of internal and external policies as well as contracts and data processing addendum templates
- Maintaining records of processing activities and reviewing how data is collected, used, and shared by Calendly
- Conducting product and feature reviews
- Training employees regularly on legal and regulatory requirements and providing internal guidance
- Creating privacy documentation and privacy-related resources
- Processing data subject access requests
- Vetting and approving third party vendors and sub-processors
- Reviewing the use of cookies and other similar technologies
- Interacting with our EU and UK representatives

The following sections describe some of the above mentioned items in more detail.

Data Processing Addendum and International Transfers

A Data Processing Addendum (DPA) is a supplement to a services agreement or terms of use, as applicable, specifying roles and obligations that are required by certain data privacy laws. Calendly customers are subject to Calendly's DPA made available here. We require that our customers use our DPA template because it is specifically designed to cover the Calendly service.

Calendly is a US-based company. As such, user and invitee data is hosted in data centers located in the US. However, we take the subject of data transfers very seriously, particularly regarding the international transfer of personal information from the European Economic Area (EEA), United Kingdom (UK) or Switzerland to Calendly in the US. Calendly has incorporated the newest GDPR-mandated Standard Contractual Clauses, the UK addendum, and Swiss data transfer clauses into its DPA as its legal transfer mechanisms under GDPR, UK and Swiss data privacy laws. You can also read more about our approach to data transfers here.

Sub-processors

Calendly has executed DPAs with all sub-processors who receive personal information to assist with the provision of the Calendly service. Our DPAs with our sub-processors include obligations that are at least as restrictive as Calendly's obligations in its DPA with its customers with respect to data protection. Prior to entering into a contract, each sub-processor is carefully reviewed as part of our vendor due diligence process and we check things like their security and privacy programs and documentation, certifications, and evidence of recent data breaches, among others. As we look to add AI features to our platform, we will not allow any applicable sub-processor to use personal information to train their models and we will not train our models without permission from our customers.

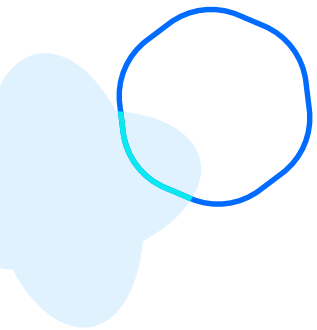
Calendly maintains a sub-processors list that you may access at any time here. We update this list from time to time. If you would like to be notified when updates to this list occur, please sign up here.

Government Requests

Due to the nature of our business and types of personal information we collect, Calendly generally does not process personal information that is of particular interest to US or other third country law enforcement or intelligence services.

Calendly has policies and procedures setting out the steps Calendly takes upon receipt of a government demand to provide customer personal information in order to assess the validity and scope of the demand. Our priority is to protect our customers' personal information and rights while remaining compliant with legal requirements.

Data Subject Requests



Data privacy laws may grant certain rights to individuals (also known as "data subjects" in some jurisdictions) when it comes to their personal information. Some of these rights (and the terminology may also vary by jurisdiction) could include, but are not limited to:

- The right to be informed
- The right of access
- The right to rectification
- The right to restrict processing
- The right to data portability
- The right to object

We understand that these requests often need to be processed in a timely manner. As a data processor and a service provider, we aim to empower our customers to handle these data subject requests in a seamless and user-friendly way within the Calendly platform. These controls are available to you whether you choose to extend data subject rights to anyone or solely to the requests that are legally required. More details on how you can respond to each type of the data subject rights mentioned above can be found here.

If Calendly receives a request from a data subject directly in its role as a data processor, Calendly will promptly inform you of the request if the data subject identifies you as the applicable controller and will advise the requestor to submit their request directly to you. Calendly will reasonably assist you with processing data subject requests in the event that you cannot act on such requests without our assistance.

Right to Erasure

Deletion requests are perhaps one of the most common data subject rights requests received by organizations. Calendly allows you to delete personal information from your invitees and/or employees directly from your settings, without needing to contact Calendly's support or privacy teams.

For example, invitee data erasure requests can be initiated based on an identified email address or a date range giving you different options depending on your regulatory or business requirements. Once you request to delete invitee data from your account, Calendly will process the deletion within 7 days of the request giving you the option to cancel the request if circumstances change. Note that once data has been deleted, it cannot be recovered.

This Help Center article covers data deletion functionality in more detail with information about handling additional scenarios such as user self-deletion and removing the personal information of departing employees.

Roles and Permissions

As you navigate the roles and responsibilities within your organization regarding these data subject rights, another important operational element to consider is the key user roles and permissions within the Calendly platform itself. Calendly offers 5 different roles depending on plan subscription:

- Owner
- Admin
- Group admin
- Team manager
- User

Each role has set permissions ranging from complete control to limited control of functionality. Owners and admins, for example, have all permissions whereas regular users do not. More information about roles and permissions within Calendly can be found here.

Consent

To accommodate certain requirements you may have around obtaining consent prior to collecting personal information from your invitees, you have the ability to customize the details of your event within Calendly to capture that consent. You can review this option and how to set it up here.

Cookies

Calendly uses cookies to provide certain features and improve the user experience of our service. When accessing Calendly or a booking page for the first time (and periodically as notices need to be refreshed), users and invitees will see a cookie banner in accordance with their local requirements. If their preferences change at any time, users and invitees always have the option to return to our privacy preference center and make the necessary changes.

Additional information about cookie management can be found here as well as in our Cookie FAQs page.

Data Security

Customer trust is critical to everything we do at Calendly. Our software is designed to request the most limited access to customer resources to achieve a seamless scheduling experience. We are continuously mindful of your privacy, security, and compliance obligations. Securing the personal information we do collect from you is a crucial component to achieving these goals.

Calendly has implemented a range of technical and organizational measures to secure your personal information. Examples of our technical and organizational measures include, but are not limited to:

- Personnel management controls such as vetting employees and contractors before hiring, providing secure tools and training necessary to conduct work, and securely managing employee departures
- Security controls in the cloud such as continuous monitoring, distributed data centers with layered security, continuous availability, secure by design infrastructure, identity and access management controls, least privilege access, appropriate firewall configurations, as well as encryption at rest and in transit, among others
    - Regarding encryption, Calendly requires HTTPS for all services using TLS (v1.2 or higher using non-deprecated cipher suites) with HSTS enabled and SHA-256 with 2048 bit RSA encryption
- Incident response, disaster recovery and business continuity policies and controls such as incident response processes, emergency succession plans, and data backup and restoration plans

- Third party audit controls such as security audits and penetration tests conducted in appropriate intervals and certifications such as SOC 2 Type II, ISO 2700, and others.

Additional information about Calendly's security practices may be found on our Security page, our Security White Paper and under the Security & Compliance section of the Calendly Help Center. You may also request copies of our certifications and detailed security documentation in Whistic and, depending on the documentation you request, we require that you execute our MNDA. Customers can also sign up to receive real time notifications about service disruptions or view our historical uptime records, as well as current status here.

Calendar Integrations

You may use either the Google Calendar or Office365 integrations to connect your calendar with Calendly to simplify scheduling. Calendly is built to only access the minimum data needed from your connected calendars to deliver its service. Calendly is designed not to store the details about the existing appointments in your calendar including details such as who you are meeting with, their email address, the meeting title or any other details about the appointments in your calendar that were not scheduled via Calendly.

Following the principles above, actual details regarding the integration may vary depending on whether you are using Google or Office 365 integrations and depend on the functionality made available by your connected calendar provider. Additional details regarding the security of calendar connections can be found here.

Additional Resources

In addition to this document, we encourage you to review our Privacy Notice, our Calendly Help Center, our Resource Center and our Developer Portal to delve into topics that may be more specific to your use or intended use of Calendly (e.g., your use of our extensions, add-ons and integrations, setting up SAML or SCIM controls, etc.). From time to time, we also update these resources to reflect changes in our business, to include details around data processing and technical information, or to comply with new laws and regulations.

Conclusion

Calendly's mission is to help you schedule better. We are committed to protecting your personal information and the personal information of all invitees who receive a Calendly link. We believe that transparency and control are key to a successful partnership. The regulatory landscape is also constantly evolving. As a result, we are continuously looking for ways to improve your ability to obtain the necessary information or take necessary actions with the Calendly service to meet your compliance obligations.

We hope that this Privacy White Paper has provided you with valuable information about our privacy practices and that it will help you make informed decisions about operationalizing your privacy program while using Calendly.

If you have any additional questions or suggestions, please don't hesitate to reach out to us. You can contact us at privacy@calendly.com.