

# Palantir's Privacy and Security Statement

*Last updated April 2024*

## Who is Palantir?

We are a technology company founded in the United States in 2003. We provide software platforms and services to help public, private, and non-governmental organizations gain insights into their data through data analysis, in a secure and privacy-protective way. You can read more about our business [here](#).

*How can you contact us?*

If you are looking:

- to understand more about [how we use your information](#), or
- to [exercise your rights](#),

you may also reach us at [privacy@palantir.com](mailto:privacy@palantir.com).

## *Data Controllers*

Palantir is a global company made up of multiple entities that process personal data in the course of conducting our business. Depending on where you engage with us, the entity responsible as controller for the processing of your personal data under this Statement may vary. Palantir Technologies Inc. is the parent company of the group, but the data controller of your information may be one of its affiliates depending on how you interact with Palantir entities. If you visit a Palantir office or engage with an employee of a Palantir office outside of the US, the Palantir affiliate based in that country will be the relevant data controller of your personal data. For example, if you attend a Palantir event in our London office, Palantir Technologies UK, Ltd. would be the data controller of your personal data. To understand where Palantir has affiliates around the world, please see [here](#). In this Statement, where we refer to “Palantir,” “we,” “our,” or “us,” we are referring to the relevant Palantir group entity that decides how and why your information is used.

## Why should you read this Statement and what does it cover?

### Why should you read this Statement?

As a commercial business, Palantir may collect, use, and disclose personal data in the course of our standard operations. Where a Palantir entity processes your personal data as controller (meaning that we determine why and how your personal data is used), this Statement sets out how we process that data in compliance with data protection and consumer privacy laws. This Statement also explains what rights you have relating to that personal data.

## What does this Statement cover?

This Statement sets out how we use and protect personal data globally. If you live or work in certain countries, states or territories, there is *additional* information at the end of this Statement that relates to our use of your personal data.

It is important to note that this Statement does not apply to personal data we process on behalf of our customers. When we provide our products and services to our customers, we act as a data processor. This means it is our customers, and not Palantir, who are in control of what personal data and other information they process using our products or services, and how they do so. Where we are a data processor, we follow our customers' instructions relating to that processing, in line with applicable laws.

Consequently, this Statement does not apply to our customers' processing of personal data using Palantir products or services. If you are seeking to understand how one of our customers processes personal data using Palantir products or services – or if you wish to exercise your rights in relation to any personal data a customer may process using Palantir products or services – the relevant customer's privacy statement is the best place to start to understand those details, or to learn how to contact them.

As you engage with our services or communications, you may encounter links to third parties outside of the control of Palantir that enable you to share information with the controllers of those websites or services. We are not responsible for the privacy policies or the data collection, use, or disclosure practices of our customers, or third-party sites, unless we notify you otherwise. If you wish to understand how they process your personal data, we encourage you to review the privacy policies of each site you visit.

## Palantir job candidates

If you apply for a role with Palantir, our [Candidate Privacy Statement](#) contains information on how we will use your personal data.

## Updates to this Statement

We may make updates to this Statement from time to time. When we do so, we will post those changes here, so please check back periodically for any updates. Where we make changes to our processing that may affect the rights of individuals affected by those changes, we will inform those individuals where possible.

## What personal data do we collect?

Palantir collects personal data through three main sources:

1. Personal data you provide to us (for example, through forms or correspondence);
2. Personal data we collect automatically (for example, when you visit Palantir websites);
3. Personal data from other sources (such as our service providers, business partners, and publicly available personal data as set out below):

**Contact Data:** First name, address, email address, telephone number, mobile phone number, country of residence and social media handles. We may collect this information directly from you, your employer, from publicly available sources, our third-party partners who provide networking contact information, or indirectly through a third-party partner such as if we have co-hosted an event with them.

**Professional Data:** Company name, occupation contact details, occupation, employment history, areas of expertise, your experience with Palantir products and services. We may collect this information directly from you, your employer, from publicly available sources, our third-party partners who provide networking contact information, or indirectly through a third-party partner such as if we have co-hosted an event with them.

**Transaction Data:** Products and/or services purchased, licenses purchased, types of products or services of interest, information provided in the course of the purchase or attempted purchase of Palantir products or services, eligibility information such as whether your company is a customer of Palantir this can be collected when you purchase products and services from Palantir.

**Payment Data:** Payment or billing information (including tokenised payment details, as necessary). We may collect this information in the course of signing up for a Palantir product or service or through the use of our website to purchase Palantir products or services.

**Technical data:** IP address, operating system, browser information, user agent. identifiers such as cookie IDs (see [Cookies and Similar Technologies](#) below, and our [Cookies Statement](#)), mobile device ID, Wi-Fi data, interactions with Palantir websites, communications and promotional materials are collected automatically when you interact with Palantir websites or third-party platforms hosting Palantir content. For example, when we send marketing communications, we may collect data on whether you have opened a marketing communication you have received, or whether you clicked on any links in the message.

**Training and Educational Data:** This can include registrations for courses, assessments signed up for and/or taken, the results of same, and certifications issued. We may collect this information when you sign up for a training or certification program, or it may be generated once you have taken part or completed a training or certification event.

**Communication Data:** Messages, correspondence and other data created, or generated, by you when communicating with Palantir via post, SMS, e-mail, posts on Palantir or third-party channels, forums, social media platforms, other third-party platforms, or other means of electronic communication. We may collect this information when you interact with Palantir or Palantir employees, contractor, agents, third-party service providers and partners.

**Government Identifiers:** Government or state issued photographic identification documentation such as passport or driver license – for example when you provide it in the course of verifying your identity.

**Audiovisual Data:** Image, voice – including photographs, images and audio and video recordings – collected through security and monitoring systems or recorded during events, for example, when you participate in a Palantir or Palantir-affiliated event, visit a Palantir office or present at a seminar hosted by Palantir.

**Inferred Data:** Preferences, likelihood of requiring Palantir products and/or services. Data generated by combining data processed by Palantir with information obtained from third parties, including partners and publicly available sources, which assist with the sale of products or services, compliance with laws, and that detect, prevent and otherwise address fraudulent, deceptive, or illegal activity.

**Contact Preference:** Consents or preferences that you give us, such as how you would like us to contact you or what Palantir products or services interest you.

## Why and how we use your personal data

The following lets you know how and why we use the personal data we collect:

### *1. To conduct our business operations and provide our products and services:*

- **To communicate with you:** We use your information, including Contact Data and Communication Data so that we can communicate with you, answer your queries, or get in touch to understand if you are interested in Palantir products and services.
- **To provide you with our products and services:** We use your information, including Contact Data, Payment Data, Communication Data, Professional Data, and Training and Educational Data, depending on the services provided, for various reasons, including to:
  - Verify your identity;
  - Send communications relating to the product or service purchased;
  - Provide you with our products and services including training or certification services; and
  - Fulfil our contract with you.
- **To process financial transactions:** We use your information, including Contact Data, Communication Data, Payment Data and Transactional Data to process transactions and to provide you with Palantir products and services. All payments are made online leveraging our third-party payment service provider.
- **To analyse activity on our websites, improve our public facing platforms and communications:** We process your information, including Technical Data, Communication Data and Training and Certification Data to understand how you use our websites, forums or training platforms and to understand improve your experience of those websites, training platforms and the communications we send.
- **To enable business transfers and transactions:** We process your information in connection with transactions if there is a proposed or actual merger, purchase, sale acquisition, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Palantir's assets, in which personal information processed by Palantir pursuant to this Privacy Statement forms part of the assets transferred.

- **To ensure compliance with our obligations:** We process your information, where required, to comply with a court order or legal requirement, including to respond to governmental or regulatory requests.
- **To protect the rights, property, life, health, safety or security:** We process your information, where required, to protect the rights, property, life, health, safety or security of Palantir, our employees, our users (including you) or others.

*2. To enable our sales and marketing functions to carry out marketing related to Palantir products and services:*

- **To send sales and marketing communications:** We use your Contact Data, Professional Data, Technical Data, Communication Data, Transaction Data, Training and Educational Data, Inferred Data and Contact Preferences to send you marketing communications about Palantir products and services we think you might be interested in purchasing or events you might wish to attend, and to carry out targeted marketing campaigns including posts to third party platforms such as social media platforms and networking websites.
- **To understand who would be most interested in our products and services and personalise our communications:** We use your Contact Data, Communication Data, Professional Data, Technical Data, Transaction Data, Training and Educational Data, Inferred Data and Contact Preferences to understand who may be interested in our products and services.
- **To analyse the effectiveness of our communications:** We use your Contact Data, Communication Data and Technical Data to understand the impact of our communications, for example to understand the effectiveness of our marketing campaigns and to improve them going forward.
- **To target advertising:** We use your Contact Data, Professional Data, Communication Data, Technical Data, Transaction Data, Training and Educational Data, and Inferred Data to target advertisements and messages to you via third party advertising platforms including search engines and social media/networking platforms such as LinkedIn or Twitter.

*3. To manage your visit to a Palantir managed space or event:*

- **To enable your visit to a Palantir designated space:** Depending on how you engage with Palantir's facilities when you visit our designated spaces or offices, we process your Contact Data, Communication Data, Professional Data, Technical Data and Audiovisual Data when you attend a Palantir designated space such as offices or pop-ups.
- **Event management:** Depending on the event or how you engage with Palantir in the course of an event hosted, or co-hosted by Palantir, we process your Contact Data, Professional Data, Communication Data, Audiovisual Data and Technical Data to enable your attendance as Palantir hosted or affiliated events such as conferences or webinars.

*4. To comply with legal obligations and maintain the physical and information security of Palantir's products and services, employees and partners:*

- **To comply with legal obligations:** Where necessary, we use your personal data, including Contact Data, Communication Data and Government Identifiers, where necessary, to comply with legal obligations such as tax reporting, regulatory requirements or fulfilling your rights request.
- **To help you exercise your rights and control over your personal data:** Where you contact us to exercise your rights as a data subject or to opt-out from certain forms of communication, we may need to further process your personal data such as Contact Data, Communication Data and any applicable personal data together with any Government Identifiers you may provide, to comply with your request (for example, if you request a copy of your personal data and you provide your ID to confirm your identity).
- **To protect our business, our affiliates, and others:** We process your personal data which can include Contact Data, Professional Data, Payment Data, Transaction Data, Technical Data, Audiovisual and Communication Data to monitor for, or detect, fraudulent, harmful or illegal activity.

## **When do we share your personal data?**

Palantir may disclose or transfer personal information that we process as required in the course of operating our business to the following recipients and purposes:

**Palantir affiliates:** Personal data is disclosed to and from Palantir Technologies Inc. and its affiliates listed here to enable and fulfil our business operations requirements. Affiliates are bound by contractual obligations to process any personal information in compliance with data protection and consumer privacy laws that apply.

**Service providers:** We disclose information as needed to our agents, contractors and service providers. These parties are bound by contractual obligations to keep personal data confidential and use it only for the purposes of providing services for, or with, us. Examples of service providers include marketing and sales services, event management, website hosting and training providers.

**Third Parties:** We disclose your personal data to third parties, including third party partners where applicable to:

- provide the result of any training course or quiz you complete with us to your employer where you have taken part in training or certification as part of an employment requirement;
- enable business transfers to a buyer or other party to a transaction if there is a proposed or actual merger, purchase, sale acquisition, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Palantir's assets, in which personal data processed by Palantir pursuant to this Statement, forms part of the assets transferred;

- disclose personal data to our partners when offering co-branded services, selling or distributing our services, running co-branded events, or engaging in joint marketing activities;
- show you relevant adverts – we may disclose pseudonymous data with advertising networks as set out in more detail in [Cookies and Similar Technologies](#);
- comply with a court order or legal requirement, including to respond to government, regulatory requests, tax authorities, police agencies, public prosecutors, civil disclosure requests or judicial requests; and
- protect the rights, property, life, health, safety or security of Palantir, our employees, our users (including you) our products and services, or others.

We may also disclose personal data to third parties at your request or direction. You also may provide personal data directly to third parties, such as when inputting credit card information on our websites to purchase products or services. In this case the information is processed directly by our payment processor partner.

## Cookies and Tracking Technologies

We use cookies and similar technologies, such as pixels and beacons, to understand how you engage with our websites, communications, advertisements or content on third party platforms. See our [Cookies Statement](#) for more information on the types of cookies we use, and how to control which cookies are stored on your device.

If you activate a social media plug-in, the social media platform automatically makes available the content to your browser, which then integrates it into our websites. In this situation, personal data may also be transferred that is initiated and controlled by the respective social network, e.g., LinkedIn. Your connection to a social media platform, the personal data transfers that take place between the social media platform and your system and your interactions on this platform are governed exclusively by the data protection provisions of the relevant social media platform.

## How long do we keep your personal data?

We collect and keep personal data only as needed or allowed for the purposes set out in this Statement, based on the reason we collected the personal data in the first instance and what is permitted under the laws that apply to the processing.

We keep the personal data we collect in line with our internal data retention policies for as long as you use our services or as long as is necessary to: (i) fulfil the purpose(s) for which we collected the personal data; (ii) provide and secure our products and services; (iii) resolve disputes, establish legal defenses, enforce our agreements and comply with applicable laws; (iv) conduct audits; and (v) comply with our internal policy requirements.

## International transfers of your personal data

If there is an international transfer of your personal data, we will use a data transfer agreement with the recipient based on any data transfer requirements imposed by local data protection laws.

If your personal data is transferred out of the EEA, UK or Switzerland, your personal data may be transferred to the United States or other countries worldwide. If your personal data is transferred to a country or organisation that is not subject to an adequacy decision by the European Commission or (where relevant) the UK Secretary of State, we will put in place suitable safeguards to ensure that any transfer is carried out in compliance with applicable data protection rules. To ensure an adequate level of protection for your personal data, we will use a data transfer agreement with the recipient based on Standard Contractual Clauses approved by the European Commission, the UK Secretary of State, or the UK Information Commissioner's Office (as applicable) under the UK GDPR and the EU GDPR (as applicable).

You may request additional information in this respect and obtain information regarding the relevant safeguard by exercising your rights as set out in the [Exercising your rights](#) section.

## Children's personal data

Our websites are not intended for children under 16 years of age. If you become aware that your child has provided us with personal data without your consent, please contact us at [privacy@palantir.com](mailto:privacy@palantir.com) and we will work to delete it. We do not knowingly collect personal information (including as defined by the U.S. Children's Privacy Protection Act, or "COPPA") from children under 16.

## Your rights in relation to your personal data

In some countries and territories, data protection and consumer privacy laws provide individuals with rights regarding the personal data processed by organisations. If you live or work in the UK, EEA or Switzerland, you have the rights below in relation to the personal data processed by Palantir. If you live or work in any other country, and that country you live or work in grants similar rights, you may also have some or all of the rights below in relation to the personal data processed by Palantir. Please note that these rights are not absolute, and in some circumstances may be balanced against other considerations, including the privacy rights of other individuals. Your rights:

***The right of access to your personal data:*** You may have the right to receive confirmation about whether we process your personal data and, if we do, to obtain access to your personal data. You may also have the right to obtain certain information about how we process your personal data.

***The right to ask us to correct any personal data we hold on you:*** You may have a right to request correction of your personal data if it is inaccurate or incomplete.

***The right to request erasure of your personal data:*** You may have a right to request the deletion of your personal data if certain grounds for erasure apply.

***The right to restrict how we process your personal data:*** In certain circumstances, you may have a right to restrict our ability to keep using your personal data. When processing is restricted, we may still store



your personal data, but may not use it unless we have your consent or need to process your personal data in connection with a legal claim, important public interest, or to protect the right of others.

***The right to object to our processing of your personal data:*** In certain circumstances, you may have a right to object to our ability to use your personal data in certain ways. In particular, in certain circumstances, you may have: (i) the right to object to the processing of your personal data where that processing is based on our legitimate interests; (ii) the right to object to processing for direct marketing purposes (including profiling).

***The right to data portability:*** In certain circumstances, you may have a right to obtain and reuse certain of your personal data in a structured, commonly used and machine-readable format. Where certain conditions apply, you may also have the right to have that personal data transferred directly to a third party.

***Right to withdraw your previously given consent to our use of your personal data:*** Where you have given us your consent to engage in certain types of processing of your personal data (e.g., where we have said we rely on consent as a lawful basis for processing your personal data), you may have the right to withdraw your consent at any time. Your withdrawal of consent will only apply to our use of your personal data in the future, and will not affect the lawfulness of anything we have done with your personal data prior to your consent being withdrawn.

***Right to lodge a complaint with the data protection or consumer privacy regulatory or authority:*** If you believe that the processing of your personal data violates legal requirements, and if the right exists in your country, state or territory, you have the right to lodge a complaint with the competent data protection authority or consumer privacy supervisory authority

If you live or work in the United Kingdom, you may complain to the Information Commissioner's Office using this [link](#).

If you live or work in the European Economic Area, you can find details of the data protection authority in your country [here](#).

Depending on your country of residence, you may have additional rights to those listed in this section. See below for further sections that may apply to you:

- Additional disclosures for [Californian Residents](#)
- France: In accordance with applicable laws and regulations, you have the right to provide instructions regarding the handling, retention, and deletion of your personal information after your death. These instructions may include, but are not limited to, the nomination of a person responsible for carrying out your instructions called a data executor. To exercise this right, you may provide clear and specific instructions about the management of your personal data after your death. These instructions should detail your preferences concerning the retention, deletion, and disclosure of your personal data to third parties. You may modify or revoke these instructions at any time. To designate a data executor, please provide their full name, contact information, and relationship to you. The data executor must be a natural person who is legally capable of carrying out your instructions.

In the absence of a designated data executor or clear instructions, your heirs may exercise your rights concerning your personal data after your death, as permitted by applicable laws and regulations. Please note that your instructions and the designation of a Data Executor do not guarantee that your personal data will be exempt from disclosure if required by law, regulation, or court order. To provide, modify, or revoke your instructions, or to designate a data executor, please contact our Data Protection Officer at [privacy@palantir.com](mailto:privacy@palantir.com). We may require additional information to verify your identity and ensure the proper execution of your instructions.

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## **Exercising your rights**

To exercise the above rights, you have the option of sending your request to the email, or address, listed below. If you are not satisfied with how we process your personal data, please let us know and we will investigate your concern. Please raise any concerns by contacting our Data Protection Officer by email at [privacy@palantir.com](mailto:privacy@palantir.com), or using the relevant details as follows:

### **United States**

Palantir Technologies Inc.

Attention: Data Protection Officer

1200 17th Street

Denver, Colorado, USA 80202

Email: [privacy@palantir.com](mailto:privacy@palantir.com)

### **United Kingdom**

Palantir Technologies UK, Ltd.

Attention: Data Protection Officer

Birchin Court

54<sup>th</sup> Floor

19-25 Birchin Lane

London

EC3V 9DU

Email: [privacy@palantir.com](mailto:privacy@palantir.com)

## European Union

Palantir Technologies GmbH

Attention: Data Protection Officer

Mainzer Landstr. 41

60329 Frankfurt am Main

Germany

Email: [privacy@palantir.com](mailto:privacy@palantir.com)

## United Kingdom, European Economic Area and Switzerland Information Territory Specific Information

The following lets you know why and how we use your personal data and what our legal basis for processing is:

To communicate with you:

- **Our legitimate interests.** We may communicate with you in various contexts utilizing various bases for processing. Certain communications may be in our legitimate interests in marketing our products and services to you, or in providing our products and services to you.
- **Your consent.** Some communications may be on the basis of your voluntary, explicit and informed consent, which you can revoke at any time.
- **Our contract with you.** Other communications may be for the purposes of performing a contract between you and Palantir, including to carry out pre-contractual measures at your request or to enter into a contract or execute a contract with you (when you are acting on behalf of a business partner or customer).

To provide you with our products and services:

- **Our contract with you.** We process this personal data to fulfil any contract between you and Palantir.
- **Our legitimate interests.** Where we do not have a contract with you directly, we process your personal data on the basis of Palantir's legitimate interest to provide the products and services.

To process financial transactions:

- **Our contract with you.** We process this personal data to fulfil the contract between us and you.

To send sales and marketing communications:

- **Your consent.** When we communicate with you for the purposes of marketing, we may do this on the basis of your voluntary, explicit and informed consent, which you may revoke at any time.
- **Our legitimate interests.** If we have not asked for your consent, we might send you marketing communications on the basis of Palantir's legitimate interest in marketing our products and services.

To understand who would be most interested in our products and services and personalise our communications:

- **Your consent.** When we communicate with you for the purposes of marketing, we may do this on the basis of your voluntary, explicit and informed consent, which you may revoke at any time.
- **Our legitimate interests.** If we have not asked for your consent, we might process your personal data to deliver relevant advertising communications to you on the basis of Palantir's legitimate interest in marketing our products and services.

To target advertising:

- **Our legitimate interests.** We process this personal data on the basis of Palantir's legitimate interest in understanding who best to market our products and services to.

To analyse activity on our websites and improve our public facing platforms and communications user experience:

- **Our legitimate interests.** We process this personal data on the basis of Palantir's legitimate interest in understanding how Palantir's websites are used and how best they can be improved.

To enable your visit to a Palantir designated space:

- **Our legitimate interests.** We process this personal data on the basis of our legitimate interest to keep our employees, contractors, visitors, our confidential information, intellectual property and that of our customers safe in Palantir designated spaces.

Event management:

- **Our legitimate interests.** We process this personal data on the basis of Palantir's legitimate interest to provide engaging and relevant content to promote Palantir products, services and ethical values.

To protect our business, our affiliates, and others:

- **Our legitimate interests.** We process this personal data on the basis of Palantir's legitimate interest to protect against harm to Palantir's rights and property, and to ensure the safety of our employees, users and others such as bringing or defending legal claims.

To comply with legal obligations:

- **Our legal obligation.** We process this personal data on the basis of Palantir's legal obligation to perform such processing, such as where the processing is necessary to comply with our legal or regulatory obligations, such as tax reporting or regulatory requirements.

To help you exercise your rights and control over your personal data:

- **Your consent.** We will process this personal data where you ask us to process this data.

To provide training and certification services:

- **Our legitimate interests.** We process this personal data on the basis of Palantir's legitimate interest if you take a course through your employer.
- **Our contract with you.** We will process this personal data in order to fulfil our contract with you if you engage with us directly to understand the use of our training and certification services and how best they can be improved.

**You have the right to object to our processing of your personal data where we rely on Palantir's legitimate interest.** Where we rely on our legitimate interests as the legal basis for processing your personal data, you can object to that processing. We will action your request unless we have compelling legitimate grounds to continue to process your personal data, or where it is needed for legal reasons. Where we have a compelling legitimate interest to continue the processing, we will communicate that clearly to you following your request.

**You have the right to object to your processing of your personal data where we use your personal data for marketing.** Where we use your personal data for marketing purposes, you can unsubscribe from, or "opt out" of, receiving marketing communications from us by using the "unsubscribe" link in any communications we send to you. See the [Cookies and Similar Technologies](#) and [Your rights](#) sections.

**Where we rely on your consent, you may withdraw your consent.** Where we rely on your consent to process your personal data, you may withdraw that consent at any time to prevent our continued processing of your personal data for that purpose. See the [Your rights](#) section.

**Where we need your personal data to comply with a contractual obligation or the law.** Where we require your personal data to fulfil our contract with you, or to comply with a legal obligation, if you fail to provide us with the personal data we need, it might prevent us from being able to comply with our obligations under that contract or fulfil our legal obligations, which might ultimately prevent us from providing you with our products or services. We will let you know where this is the case.

## **Additional disclosures for California residents**

### **California Consumer Privacy Act Notice**

*Last updated April 2024.*

This section (the "CCPA Notice") provides additional information regarding the California Consumer Privacy Act of 2018 (the "CCPA"), as amended by the California Privacy Rights Act of 2020, and supplements the disclosures and information throughout this Privacy Statement. The commitments in this CCPA Notice apply only to individuals covered by the CCPA and are subject to certain statutory exceptions laid out in the CCPA. This CCPA Notice does not apply to information we collect about individuals in their capacity as present or former job applicants, employees, contractors, owners, directors, or officers of Palantir.

This Privacy Statement and CCPA Notice have been designed to be accessible to people with disabilities. If you experience any difficulties accessing the information here, please contact us at [accommodations@palantir.com](mailto:accommodations@palantir.com) or use the relevant details in the [Contact Us](#) section. To print this Privacy Statement and CCPA Notice, please click [here](#).

## **Personal Information we collect**

Under the CCPA, “Personal Information” is information that identifies, relates to, or could reasonably be linked with a particular consumer or household. “Personal Information” does not include publicly available information, deidentified or aggregated information, or information covered by certain sector-specific privacy laws. “Sensitive Personal Information” refers to information that reveals a consumer’s social security, driver’s license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of mail, email, and text messages unless Palantir is the intended recipient of the communication; genetic data; and biometric information.

Below, we identify (1) the categories of Personal Information and Sensitive Personal Information (as listed in the CCPA) that we plan to collect and use, and have collected and used within the preceding 12 months; (2) the categories of recipients to which we have disclosed each category of Personal Information or Sensitive Personal Information for our operational business purposes within the preceding 12 months; (3) the criteria we use to determine the retention period for each category of Personal Information or Sensitive Personal Information; and (4) the categories of Personal Information and Sensitive Personal Information we have sold or shared within the preceding 12 months, as “sale” and “sharing” are defined in the CCPA.

Please note, we do not sell Personal Information in the traditional sense of the word for monetary consideration. However, because the definitions of “sale” and “sharing” under the CCPA are broad enough to potentially include the disclosure of your information to certain types of advertising and marketing partners, we provide consumers with the right to opt-out of any such sale or sharing of their Personal Information. We do not knowingly sell or share the Personal Information of anyone under 16 years old.

## **Use of Personal Information**

We use Personal Information for a variety of business and commercial purposes, as described in the [Why and how we use your personal information](#) section above.

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### **Category of Personal Information Collected:**

- Contact Data identifiers such as name, address, email address, telephone number, mobile phone number, IP address, and social media handles.

### **Disclosed to Which Categories of Recipients for Operational Business Purposes:**

- Palantir affiliates

- Service providers that provide services to us, such as performing functions around provision of technical infrastructure, marketing services, general processing, and maintenance services
- Third-party partners, such as partners offering co-branded services with us, selling or distributing our services, running co-branded events, or engaging in joint marketing activities with us (“Third-Party Partners”)
- Government authorities, state institutions, or other parties pursuant to law

**Sold and/or Shared for Cross-Contextual Behavioral Advertising? If so, to Which Categories of Third Parties:**

Yes

- IP address, social media handles and other Technical Data,
- Advertising and marketing partners
- Advertising technology vendors
- Social media platforms

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**Category of Personal Information Collected:**

- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, address, telephone number, driver’s license or state identification card number, or financial information such as payment or billing information.

**Disclosed to Which Categories of Recipients for Operational Business Purposes:**

- Palantir affiliates
- Service providers that provide services to us, such as performing functions around provision of technical infrastructure, marketing services, general processing and maintenance services
- Third-Party Partners
- Government authorities, state institutions, or other parties pursuant to law

**Sold and/or Shared for Cross-Contextual Behavioral Advertising? If so, to Which Categories of Third Parties:**

Yes, name, address and telephone number:

- Advertising and marketing partners
- Advertising technology vendors
- Social media platforms

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**Category of Personal Information Collected:**

- Commercial information, such as records of personal property, history of products or services purchased, obtained or considered.

**Disclosed to Which Categories of Recipients for Operational Business Purposes:**

- Palantir affiliates

- Service providers that provide services to us, such as performing functions around provision of technical infrastructure, marketing services general processing and maintenance services

**Sold and/or Shared for Cross-Contextual Behavioral Advertising? If so, to Which Categories of Third Parties:**

No

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**Category of Personal Information Collected:**

Internet or other similar network activity, such as information on a consumer's interaction with a website, application, or advertisement.

**Disclosed to Which Categories of Recipients for Operational Business Purposes:**

- Palantir affiliates
- Service providers that provide services to us, such as performing functions around provision of technical infrastructure, marketing services, general processing and maintenance services

**Sold and/or Shared for Cross-Contextual Behavioral Advertising? If so, to Which Categories of Third Parties:**

Yes

- Advertising and marketing partners
  - Advertising technology vendors
  - Social media platforms
- 

**Category of Personal Information Collected:**

- Sensory data, such as audio, electronic, visual, or similar information.

**Disclosed to Which Categories of Recipients for Operational Business Purposes:**

- Palantir affiliates
- Service providers that provide services to us, such as performing functions around provision of technical infrastructure, marketing services, general processing and maintenance services
- Government authorities, state institutions, or other parties pursuant to law

**Sold and/or Shared for Cross-Contextual Behavioral Advertising? If so, to Which Categories of Third Parties:**

No

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**Category of Personal Information Collected:**

- Professional or employment-related information, such as company name, occupation contact details, occupation, employment history, areas of expertise, and your experience with Palantir products.

**Disclosed to Which Categories of Recipients for Operational Business Purposes:**

- Palantir affiliates
- Service providers that provide services to us, such as performing functions around provision of technical infrastructure, marketing services general processing, and maintenance services

**Sold and/or Shared for Cross-Contextual Behavioral Advertising? If so, to Which Categories of Third Parties:**

Yes

- Advertising and marketing partners
  - Social media platforms
- 

**Category of Personal Information Collected:**

- Education information, such as information about your educational attainments (this category is defined to exclude any publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)), registrations for courses, assessments, and the results of courses and assessments.

**Disclosed to Which Categories of Recipients for Operational Business Purposes:**

- Palantir affiliates
- Service providers that provide services to us, such as performing functions around provision of technical infrastructure, marketing services, general processing and maintenance services
- Your employer or the applicable entity through which you applied for training or certification.

**Sold and/or Shared for Cross-Contextual Behavioral Advertising? If so, to Which Categories of Third Parties:**

No

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**Category of Personal Information Collected:**

- Inferences drawn from other Personal Information to create a consumer's profile reflecting personal or professional preferences, characteristics, or predispositions.

**Disclosed to Which Categories of Recipients for Operational Business Purposes:**

- Palantir affiliates

- Service providers that provide services to us, such as performing functions around provision of technical infrastructure, marketing services, general processing and maintenance services
- Government authorities, state institutions, or other parties pursuant to law

**Sold and/or Shared for Cross-Contextual Behavioral Advertising? If so, to Which Categories of Third Parties:**

Yes

- Advertising and marketing partners
  - Advertising technology vendors
  - Social media platforms
- 

Below, we provide this information related to Sensitive Personal Information:

**Category of Personal Information Collected:**

- Personal Information that reveals a consumer's driver's license, state identification card, or passport number

**Disclosed to Which Categories of Recipients for Operational Business Purposes:**

- Palantir affiliates
- Third-party service providers that provide services to us, such as performing functions around technical infrastructure and processing, maintenance, and payment processing
- Government authorities, state institutions, or other parties pursuant to law

**Sold and/or Shared for Cross-Contextual Behavioral Advertising? If so, to Which Categories of Third Parties:**

No

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We may use Personal Information to generate deidentified data sets. To the extent we treat data as deidentified under the CCPA, we will maintain and use that data solely in deidentified form and will not attempt to reidentify that data with any individuals, other than to assess whether the deidentification process complies with applicable law or as otherwise permitted by applicable law.

**Retention Period**

We use the following criteria to determine the period of time for which we retain each category of Personal Information and Sensitive Personal Information:

for as long as our services to which this Statement applies;

as long as we anticipate you may be interested in our products;

to fulfil the purpose(s) for which we collected the Personal Information or Sensitive Personal Information;

to provide and secure our products and services;

to resolve disputes, establish legal defenses, enforce our agreements and comply with applicable laws;

to conduct audits; and

to comply with our internal policy requirements.

### **Sources of Personal Information**

We obtain the categories of Personal Information listed above (including Sensitive Personal Information) directly from consumers or from devices on which our products or services are installed, as well as from the following categories of sources: our affiliates, publicly-available databases, third-party business partners, social media sites, and other third-party sources.

### **Use of Sensitive Personal Information**

Sensitive Personal Information is only used or disclosed to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services; to prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted Personal Information or other information; to resist malicious, deceptive, fraudulent, harmful or illegal actions directed at the business and to prosecute those responsible for those actions; to ensure the physical safety of natural persons; short-term, transient use; or perform services on behalf of the business.

### **Disclosure**

Any disclosures of your information to third parties over the preceding 12 months have been in accordance with the permitted categories in the [When do we disclose your personal information](#) section of the Privacy Statement above.

### **Your CCPA Rights**

California residents may make the following types of requests under the CCPA:

#### **Requests to Know, Delete, Correct or Opt-out of Sharing:**

Request to Know: You may request that we disclose the following information to you about our collection and use of your Personal Information, in each case including Sensitive Personal Information: (1) the categories of Personal Information we collected about you; (2) the categories of sources from which we collected this Personal Information; (3) the categories of Personal Information that we have sold, shared, or disclosed, (4) the categories of recipients to whom this information was sold, shared, or disclosed; (5) the business or commercial purpose for selling, sharing, or disclosing Personal Information; and (6) the specific pieces of information we collected about you.

**Request to Delete:** You may request that we delete Personal Information and Sensitive Personal Information that we have collected from you. We may limit or deny your deletion request in certain cases, in accordance with exceptions specified in the CCPA.

**Request to Correct:** You may request that we correct inaccurate Personal Information and Sensitive Personal Information that we maintain about you, taking into account the nature of the information and the purposes of the processing of the information.

**Request to Opt-Out of the Sale or Sharing:** You may opt out of our “sale” of Personal Information or “sharing” of Personal Information.

### **How to Submit Requests to Know, Delete, or Correct**

If you would like to exercise a CCPA right with respect to Palantir, please complete the form [here](#) or submit an email request to [ccpa-requests@palantir.com](mailto:ccpa-requests@palantir.com) with “California Request to Know,” “California Request to Delete,” or “California Request to Correct” in the subject line. For a “Request to Know,” please specify what details you would like to know, including any specific pieces of Personal Information you would like to access. For a “Request to Delete,” please specify what information you would like to have deleted (which may be all your information as required by the CCPA). For a “Request to Correct,” please specify what information you would like to have corrected.

If you submit a request, we may ask for information necessary to verify your identity and eligibility to assert this right, and we will respond to verified requests in accordance with the CCPA.

If your request relates to Personal Information that we process about you as a service provider or contractor on behalf of a customer, please direct your request to our relevant customer. If you wish to make your request directly to us, please provide the name of our customer on whose behalf we processed your Personal Information. We will refer your request to that customer and will support them to the extent required by applicable law in responding to your request.

**Authorized Agent.** You may also utilize an authorized agent to exercise your CCPA rights on your behalf. As part of our verification process, we may request that an authorized agent provide, as applicable, proof concerning status as an authorized agent to act on your behalf. If an authorized agent is making a Request to Know, Request to Delete, or Right to Correct on behalf of a California resident and has not provided a power of attorney from the resident pursuant to Probate Code sections 4121-4130, we may also require the resident to verify their own identity directly with us; or directly confirm with us that they provided you permission to submit the request.

**Right to non-discrimination.** You may not be discriminated against because you exercise any of your rights under the CCPA, and Palantir is committed to this principle.

## How to Submit Requests to Opt-Out of Sale or Sharing

To opt-out of sale or sharing, please visit “Do Not Sell or Share My Personal Information” by submitting a form [here](#), clicking on “Cookie Settings” which can be found at the bottom left of this web page, or by emailing us at [ccpa-requests@palantir.com](mailto:ccpa-requests@palantir.com). Due to a lack of industry standard to enable the recognition of “Do Not Track” (“DNT”) privacy preferences we cannot commit to recognize and honor all “Do Not Track” preferences. However, we do recognize opt-out preference signals as required by the CCPA. Opt-out preference signals will be processed in accordance with the CCPA.

## Contact Us

If you have any questions or requests in connection with the CCPA, please contact us at the methods provided below:

*Mailing address:*

Palantir Technologies Inc.

Attention: Legal Department, Privacy Statement Issues

100 Hamilton Ave.

Suite 300

Palo Alto, CA 94301

*Email:* [privacy@palantir.com](mailto:privacy@palantir.com)