

**This Privacy Policy was last modified and is effective as of September 5, 2024.**

**California Notice at Collection:** If you are a California resident, see the [California Privacy Rights Statement](#) section below for important information about your rights under California law. If you are located in the European Economic Area, UK, or Switzerland, please also see the [Supplemental European Privacy Statement](#) below.

Your privacy is important to Rubrik, Inc., and its affiliates, including Rubrik International, Inc., 3495 Deer Creek Road, Palo Alto CA, 94304 (“Rubrik”, “we” or “us”).

In this Privacy Policy, we provide information about how we process personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including, as applicable, our websites, applications, social media pages, marketing activities, live events, visiting our facilities, and other activities described in this Privacy Policy) (collectively, the “Online Services”).

We provide a cybersecurity monitoring solution to our business customers. This Privacy Policy does not apply to information that we process on behalf of our business customers (such as businesses and other organizations) while providing our services to them. Our use of information that we process on behalf of our business customers may be governed by our agreements with such customers. If you have questions or concerns regarding your personal information that we process on behalf of a business customer (including to exercise any rights you may have with respect to such information), please direct your concerns to that business customer.

Our websites, products and services are designed and intended for businesses and their representatives. We do not offer products or services for use by individuals for their personal, family or household purposes. Accordingly, we treat all personal information we collect as pertaining to individuals in their capacities as representatives of the relevant business and not their individual capacities.

You can download a printable copy of this Privacy Policy [here](#).

## **What Personal Information Do We Collect?**

We collect various categories of personal information to provide you with the Online Services, as follows:

- **Contact and Request Information:** We collect personal information that allows us to be in contact with you (such as name, email address, phone number and address) and other personal information that you voluntarily provide to us when you contact us via our Online Services or chat features with a question, register for an event, comment or request in relation to our products and services.
- **Account Information:** If you create an account on one of our Online Services, we collect your company, user identifier and password. We also collect information about your usage of our Online Services in association with your account, namely, your account preferences, which features of the Online Services you use and for how long, and any requests or orders made via your account.
- **Website Information and Mobile Information:** When you access our websites, we automatically collect your computer or other device’s internet protocol (IP) address and other technical

information about your computer or other device and website usage, namely, your browser type and version, internet service provider, time zone setting, referring/exit pages, operating system, date/time stamps and/or clickstream data. We also use cookies and other tracking technologies, including chat technologies, on our websites; for more information, please see the Cookies and Other Technologies Information section below.

- **Public Information about You:** If you have identified yourself to us as a user of our Online Services, expressed interest in our products or services, or may have an interest in our products or services, we may collect personal information from publicly available sources, such as social media, public directories etc. We also use third-party search, data enrichment and prospecting information providers to find business contact information about potential business customers who may be interested in our services [e.g. LinkedIn Sales Navigator, ZoomInfo, Lusha, 6Sense].
- **Audiovisual Information about You:** Photograph, and images/footage captured/recorded on CCTV or other audio, video and related security/monitoring systems or captured during marketing/public filming events/sessions (including recording of virtual or live workshops or other events/sessions).
- **Marketing Information:** Your preferences for receiving our marketing communications and details about your engagement with them.
- Other data not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

We may also provide public bulletin boards or forums on our Online Services. Please note that any personal information you post via these bulletin boards or forums may be accessible to the public. This information can be seen, collected, and used by others, including being cached, copied, screen captured, or stored elsewhere by others (e.g., search engines), and we are not responsible for any such use of this information.

### **How Do We Use Your Personal Information?**

We use your personal information to access, deliver, manage and optimize our products and services, to administer your choices, for understanding or analyzing website traffic, for personalizing your website and advertising experiences where applicable and to provide Online Services. In particular, we may use:

- Personal data collected to access, deliver and manage the services you have licensed or subscribed to, including setting up user and admin accounts, providing engineering and business customer support and managing features and functionality of other auxiliary or third party services.
- Contact and request information to respond to your comments, questions and requests, and provide you with any product documentation or whitepapers you request. As permitted by applicable law, including with your consent where required, we may use your contact information to provide you with marketing communications, promotional offers and updates on new services and benefits.
- Business contact information to administer or invite you to live events, webinars, conduct sales planning and outreach that we legitimately believe you would be interested in, or to grant you access to a physical office or facility. This information is stored within business customer relationship marketing databases.

- Website information and mobile information to monitor the performance of our websites and mobile applications, analyze trends, usage and activities in connection with our websites, email marketing activities and mobile applications, and ensure their technological compatibility with users. This includes use of machine learning as well as tools and services like Adobe Analytics, Marketo, and 6Sense.
- Account information to manage your Online Services, account or portal that you have signed up to, communicate with you in relation to your account, personalize our Online Services for you, including pre-filling forms where available if you are in our business customer relationship marketing database and have consented (where applicable) to cookies, provide you with customer service, product updates and warranty information, and monitor the performance of our Online Services.
- We may also use website information, mobile information, predictive analytics and information stored in our customer relationship management database for targeted advertising purposes where permitted by applicable law.
  - We use third-party advertising partners such as 6Sense, Influo2, Facebook, Google and LinkedIn who may use cookies and other technologies to collect website information and mobile information and other information to serve online ads about Rubrik that we think will interest you. This is called interest-based advertising. We may also share information about our users with these companies to facilitate behavioral or targeted advertising to those or similar users on other online platforms.
  - We may send you targeted email messages which may include the use of web beacons so that we can understand if the message was successfully delivered, opened or shared. When clicking on links in an email, we may record that activity within our email management software, analytics platforms and customer relationship marketing databases so that we can understand the performance of these emails as applicable by law. We may use this information to predict the likelihood of your continued interest in our products and services, as well as to personalize your website experience, or to show you more relevant advertisements. For more information, please see the Cookies and Other Technologies Information section below.
- Public information including but not limited to, your social media handles or social media activity such as likes or comments if you engage with any of Rubrik's social media content. We may combine this with other personal information we may have about you to personalize our Online Services for you and identify products and services that we believe may be of interest to you or your business.
- Audiovisual information about you in connection with operating and managing any facilities or business operations, and hosting or managing any events that we may sponsor or be a participant.
- Marketing and analytics information about you to understand your potential interest in our services and to send you personalized direct marketing communications based on your needs and interests.
- Recorded information may be used, including recording phone calls (in accordance with applicable laws) for training, quality assurance and administrative purposes. If required by applicable law, we will give you the option to object to a call being recorded.

- We may use Generative AI (GenAI) models and chatbots to enhance or improve certain products and services, such as automated content generation, personalized recommendations, code development or review, quality assurance, and customer support. When you provide feedback or interact with our chatbot, we may also use the transcripts and feedback received to refine and optimize these models. These GenAI models are trained on datasets managed by Rubrik and are designed to generate outputs based on user inputs and relevant source documents. We ensure that all data used in training and feedback processes is handled in accordance with our privacy policies and applicable regulations.
- We also use your personal information as necessary to comply with our legal and contractual obligations and to protect our legal interests, such as in the event of a complaint or dispute.
- We may create aggregated, de-identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified and/or anonymized data by removing information that makes the data identifiable to you. We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Online Services and promote our business. We will not attempt to re-identify any such data, except as permitted by law.

Additionally, in some cases, we may specifically ask for your consent to collect, use, or share your personal information, such as when required by law.

### **What Personal Information Do We Disclose?**

Rubrik may disclose your personal information to the following third parties, and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection:

- To Rubrik's service providers, who act on Rubrik's behalf and instructions to fulfill product orders, deliver services, provide IT, website or webinar hosting and customer support (including online chat functionality and data enrichment or cleansing providers) and security services, and fulfill the other purposes set forth above.
- To other Rubrik-owned business entities for the purposes of coordinating our global enterprise's provision and development of products and services.
- To third-party advertising partners, for the targeted advertising practices, described below.
- To business and marketing partners, such as third parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.
- As required by applicable law, including, without limitation, in response to any government or regulatory agency request, to cooperate with law enforcement investigations, or upon receipt of any court order.
- To professional advisors, such as lawyers, auditors, bankers, and insurers, where necessary in the course of the professional services that they render to us.

- To business transferees (e.g., a prospective or actual purchaser or seller in the context of a merger, acquisition or other reorganization or sale of Rubrik’s business or assets). Rubrik’s practice is to seek reasonable protection for information in these types of transactions.
- To courts and public authorities to protect you, Rubrik or third parties from harm, including fraud or instances where somebody’s physical safety is at risk.

Service providers acting on Rubrik’s behalf shall be obliged to adhere to confidentiality requirements no less protective than those set forth herein and will only receive access to your personal information as necessary to perform their functions.

We also perform statistical analyses of the users of our Online Services to improve the content, design and navigation of the Online Services and our other products and services. In these cases, we use aggregate or statistical data that cannot reasonably be used to identify you in most cases. When you engage with an email or other technology (such as chat features on our site), fill in a form, attend an event we host or sponsor, we may store this information in our analytics or CRM systems to better understand your interests in order to provide you with the most relevant communication related to our products and services.

### **Sources of Personal Information**

If Rubrik does not obtain your personal information directly from you, Rubrik may obtain it from the following sources: publicly available sources (such as public websites, public authorities, the internet, social media, or registers), Rubrik’s employees or consultants or employers of our consultants, Rubrik’s affiliates and partners, subsidiaries or newly acquired entities, public authorities, educational institutions, suppliers and vendors, including any third-party data providers, and when you visit any Rubrik offices.

### **Your Choices**

In this section, we describe the rights and choices available to all users. Users who are located in California and Europe can find additional information about their rights below.

Access or update your information. If you have registered for an account with us through the Online Services, you may review and update certain account information by logging into the account or by contacting us.

Opt-out of communications. If you no longer wish to receive marketing-related communications, you may opt-out of receiving these emails by clicking “[Unsubscribe](#)” found in emails we send you. Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.

Blocking images/clear gifs. Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.

Advertising choices. You may control or limit use of some of your personal information for targeted advertising by clicking to access your [cookie settings](#) or through the following settings/options/tools:

- Browser settings. Changing your internet web browser settings to block third-party cookies. If you have enabled a legally recognized browser-based opt-out preference signal (such as Global Privacy Control) on your browser, we recognize such preference in accordance and to the extent required by applicable law.
- Privacy browsers/plug-ins. Using privacy browsers and/or ad-blocking browser plug-ins that let you block tracking technologies.
- Platform settings. Google, LinkedIn and Meta offer opt-out features that let you opt-out of use of your information for interest-based advertising from their websites.
- Ad industry tools. Opting out of interest-based ads from companies that participate in the following industry opt-out programs:
  - Network Advertising Initiative: [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)
  - Digital Advertising Alliance: [optout.aboutads.info](http://optout.aboutads.info).
  - Mobile settings. Using your mobile device settings to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes.

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for interest-based advertising purposes.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

### **Third-Party Websites**

Our Online Services may include links to third-party applications, products, services, or websites. If you access those links, you will leave our Online Services. Rubrik does not control these third-party sites or their privacy practices, which may differ from Rubrik's practices. The Rubrik Privacy Policy does not cover the personal information you choose to provide to or that is collected by these third-parties. You are encouraged to review the privacy documentation of any third-party site you interact with before you allow them to collect and use your personal information.

Rubrik may also provide social media features, such as the Facebook, LinkedIn, Vimeo, YouTube or Twitter buttons that enable you to share information with your social networks to interact with Rubrik on various social media websites. Your use of these features may result in the collection or sharing of information about you depending on each specific social media website. This may include your IP address, which page you are visiting on our site, and a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are governed by the privacy policy of the company providing it.

### **Persons under the Age of 13**

We do not knowingly collect personal information from minors under the age of 13. If we learn that we have collected the personal information of a minor under 13 years old, we will comply with applicable legal requirements to delete the information.

## **Cookies and Other Technologies**

Rubrik and our partners (e.g., marketing partners, analytics, advertising, or service providers) use various tracking technologies such as cookies, web beacons, pixels, tags and scripts alone or in conjunction with cookies to analyze trends on our Online Services, administer our Online Services, and to gather firmographic and demographic information about our user base as a whole. We receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis in most cases. If you provide personal information on our website and accept cookies, Rubrik may combine this data in our CRM or analytics systems.

Please see our Cookies Policy [here](#) for more details including, information about your choices with respect to advertising and social media cookies and for access to our cookie consent manager. We respond to both the Do Not Track and the Global Privacy Control signal.

We also use chat technologies, such as those provided by Drift, Inc. and similar technology providers that employ cookies and software code to operate the chat features that you can use to communicate with us through the Online Services. Drift, Inc. and other third parties may access and use information about web pages visited on our website, your IP address, your general geographic information (e.g., city, state), and other personal information you share through online chats only for the purposes described in this Privacy Policy.

## **Targeted Advertising Practices**

We rely on a third-party services provider to serve and manage our advertising on other sites. These service providers may use technologies such as cookies and other non-cookie technology to gather information about your activities on our websites and other sites in order to provide you with advertising based upon your browsing activities, interests or other information we may provide them. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#) (or if located in the European Union click [here](#)).

Please note this does not opt you out of being served ads. You may continue to see more generic ads.

## **Protection of Personal Information**

Rubrik takes a number of precautions — including administrative, technical, and physical measures — designed to safeguard your personal information against loss, theft, and misuse, as well as against unauthorized access, disclosure, alteration, and destruction. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

## **Retention of Personal Information**

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **Access to Personal Information**

As described above, you can help ensure that your contact information and preferences are accurate, complete, and up to date by contacting us using the information below. For other personal information, to the extent required by applicable data protection law, we make good faith efforts to provide you with access so you can request that we correct the data if it is inaccurate or delete the data if Rubrik is not required to retain it by law or for legitimate business purposes. We will respond to your request within 30 days or sooner where required by law. As permitted by applicable law, we may decline to process requests where the data is required to be retained by law, required for legitimate business purposes, or jeopardizes the privacy of others.

## **Privacy Policy Updates**

Rubrik may update its Privacy Policy from time to time to reflect changes to our information practices. When we change the policy in a material way, we will provide you with notice as required by applicable law, including notifying you by updating the date of this Privacy Policy and posting it on the Online Services or other appropriate means. We encourage you to periodically review this page for the latest information on our privacy practices.

## **Contacting Us**

We value your opinions. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

If you have any general questions or comments for Rubrik, please contact us at:

Rubrik, Inc.  
3495 Deer Creek Road  
Palo Alto, California 94304  
USA

Or via e-mail at [privacy@rubrik.com](mailto:privacy@rubrik.com) or via [webform](#).

You can also contact our Data Privacy Officer's by emailing [dpo@rubrik.com](mailto:dpo@rubrik.com) or via letter, clearly marked for the attention of the Data Privacy Officer, at 3495 Deer Creek Road, Palo Alto, CA. 94304.



## California Privacy Rights Statement

This section describes how we collect, use and share Personal Information of California residents in our capacity as a “business” under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, “CPRA”) and the rights these users may have with respect to their Personal Information.

For purposes of this section, the term “Personal Information” has the meaning given in the CPRA and does not include information exempted from the scope of the CPRA.

This section does not apply to our collection, use, and sharing of Personal Information of our job applicants and employees. We provide a different privacy notice to such individuals, and that notice applies to such individuals instead of this section.

**Your California privacy rights.** California residents have the rights listed below. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:
  - The categories of Personal Information that we have collected.
  - The categories of sources from which we collected Personal Information.
  - The business or commercial purpose for collecting and/or selling Personal Information.
  - The categories of third parties with which we share Personal Information.
  - The categories of Personal Information that we sold or disclosed for a business purpose.
  - The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Correction.** You can ask us to correct inaccurate Personal Information that we have collected about you.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out.**
  - Opt-out of certain processing of Personal Information for targeted advertising purposes. You can opt-out of certain processing of personal information for targeted advertising purposes.
  - If you have enabled a legally recognized browser-based opt-out preference signal (such as Global Privacy Control) on your browser, we recognize such preference in accordance and to the extent required by applicable law. You will need to turn this on for each browser. You can also opt out by engaging with your cookies setting and turning off Social Media and Advertising cookies.
  - Opt-out of profiling/automated decision making. You can opt-out of automated processing or profiling performed on personal information to evaluate, analyze, or

predict personal aspects related to a person's economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

- o Opt-out of other sales of personal data. You can opt-out of other sales of your Personal Information.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CPRA.

**Exercising your right to information/know, access, correction, and deletion.** You may submit requests to exercise your right to information/know, access, correction, or deletion at <https://www.rubrik.com/legal/privacy-request>, or via email to [privacy@rubrik.com](mailto:privacy@rubrik.com).

**Exercising your right to opt-out of the “sale” or “sharing” of your Personal Information.** Like many companies, we use services that help deliver targeted ads to you as described above. California law may classify our use of some of these services as “selling” or “sharing” your Personal Information with the advertising partners that provide the services. You can submit requests to opt-out of certain processing of Personal Information for targeted advertising purposes or other sales of Personal Information here: <https://www.rubrik.com/legal/privacy-request>, or via email to [privacy@rubrik.com](mailto:privacy@rubrik.com).

**Verification of identity; authorized agents.** We will need to verify your identity in order to process your information/know, access, correction, or deletion requests and reserve the right to confirm your residency. To verify your identity, we may require government identification, a declaration under penalty of perjury, or other information, where permitted by law.

Your authorized agent may make a request on your behalf upon our verification of the agent’s identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CPRA rights on your behalf, provide the information we request to verify your identity, and provide us with confirmation that you have given the authorized agent permission to submit the request.

**Personal Information that we Collect, Use, and Disclose.** We have summarized the Personal Information we collect by reference below to both categories defined in the “What personal information do we collect” section of this Policy above and the categories of Personal Information specified in the CPRA and describe our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of Personal Information not described below.

Personal Information (“PI”) we collect	CCPA statutory category	Source of PI	Business/ commercial purpose for PI collection	Categories of third parties to whom we “disclose” PI for a business purpose	Categories of third parties to whom we “sell” or “share” PI
Contact and Request Information	Identifiers Commercial	You Third - party	For the purposes disclosed in “How do we use your	Service providers Rubrik-owned	Business and marketing partners

	<p>information</p> <p>California customer records</p> <p>Internet or network information</p>	<p>sources</p> <p>Automatic collection</p>	<p>personal information?"</p>	<p>business entities</p> <p>Third-party advertising partners</p> <p>Business and marketing partners</p> <p>Business transferees</p> <p>Others as required by applicable law</p> <p>Professional advisors</p> <p>Courts and public authorities</p>	
<p>Account Information</p>	<p>Identifiers</p> <p>Commercial information</p> <p>Professional or employment information</p> <p>California customer records</p> <p>Internet or network information</p>	<p>You</p> <p>Automatic collection</p>	<p>For the purposes disclosed in "How do we use your personal information?"</p>	<p>Service providers</p> <p>Rubrik-owned business entities</p> <p>Third-party advertising partners</p> <p>Business and marketing partners</p> <p>Business transferees</p> <p>Others as required by applicable law</p> <p>Professional advisors</p> <p>Courts and public authorities</p>	<p>Business and marketing partners</p>

<p>Website information and mobile information</p>	<p>Identifiers  Internet or network information</p>	<p>Automatic collection</p>	<p>For the purposes disclosed in “How do we use your personal information?”</p>	<p>Service providers  Rubrik-owned business entities  Third-party advertising partners  Business and marketing partners  Business transferees  Others as required by applicable law  Professional advisors  Courts and public authorities</p>	<p>Advertising partners (to facilitate online advertising)  Business and marketing partners</p>
<p>Audiovisual information</p>	<p>Sensory information</p>	<p>You  Automatic collection</p>	<p>For the purposes disclosed in “How do we use your personal information?”</p>	<p>Service providers  Rubrik-owned business entities  Others as required by applicable law  Business transferees  Professional advisors  Courts and public authorities</p>	<p>N/A</p>

<p>Marketing information</p>	<p>Identifiers</p> <p>Commercial information</p> <p>California customer records</p> <p>Internet or network information</p>	<p>You</p> <p>Third - party sources</p> <p>Automatic collection</p>	<p>For the purposes disclosed in “How do we use your personal information?”</p>	<p>Service providers</p> <p>Rubrik-owned business entities</p> <p>Third-party advertising partners</p> <p>Business and marketing partners</p> <p>Business transferees</p> <p>Others as required by applicable law</p> <p>Professional advisors</p> <p>Courts and public authorities</p>	<p>Advertising partners (to facilitate online advertising)</p> <p>Business and marketing partners</p>
<p>Data derived from the above</p>	<p>Inferences</p>	<p>N/A</p>	<p>To provide and optimize our products and services</p> <p>To market and advertise to you</p> <p>For compliance and protection purposes as described in this Privacy Policy</p>	<p>Service providers</p> <p>Rubrik-owned business entities</p> <p>Third-party advertising partners</p> <p>Business and marketing partners</p> <p>Business transferees</p> <p>Others as required by applicable law</p> <p>Professional advisors</p> <p>Courts and public authorities</p>	<p>Advertising partners (to facilitate online advertising)</p> <p>Business and marketing partners</p>

## California Privacy Rights Reporting

	Requests Submitted	Requests Fulfilled in Whole Or In Part*	Average Days to Respond	Average Days to Complete a Request**
Requests for access to Personal Data	0	-	-	-
Requests to delete Personal Data	4	3	1	11
Objections to processing Personal Data	6	6	1	7
Requests to correct Personal Data	0	-	-	-

\*Requests may be unable to be completed due to factors like duplicate requests, the inability to verify the resident's identity, or lack of response.

\*\*Time to complete a request may depend in part on receipt of information from the person making the request, such as information to verify the person's identity or information about the action requested.

Data is for all requests received by Rubrik Inc. Affiliates from California residents between January 1 and September 3, 2024.

## Supplemental European Privacy Statement

The information provided in this Supplemental European Privacy Statement applies only to individuals in the European Economic Area, United Kingdom, and Switzerland (collectively, “Europe”). If you are based in Europe, this Supplemental European Privacy Statement applies to you in addition to the Privacy Policy above.

References to “personal information” in this Privacy Policy should be understood to include references to “personal data” as defined by the “GDPR” (i.e., the General Data Protection Regulation 2016/679 (“EU GDPR”) and the EU GDPR as it forms part of UK law (“UK GDPR”). Under the GDPR, personal data is information about an individual, from which that individual is either directly identified or can be identified. It does not include ‘anonymous data’ (i.e., information where the identity of the relevant individual has been permanently removed and that individual is no longer identified or identifiable).

Rubrik, Inc. is the controller in respect of the personal data covered by this Privacy Policy for the purposes of the GDPR. See ‘European Contacts’ for our contact details.

Cookies. With respect to web cookies and other technologies that are not strictly necessary for our provision of the Online Services, Rubrik seeks consent from users of the Online Services in Europe based on a separate [Cookies Policy](#).

### Legal Basis of Processing.

- In respect of each of the purposes for which we use your personal data, the GDPR requires us to ensure that we have a “legal basis” for that use. Our legal bases for processing your personal information described in this Privacy Policy are listed below. Where we need to perform a contract, we are about to enter into or have entered into with you (“Contractual Necessity”).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests (“Legitimate Interests”). More detail about the specific legitimate interests pursued in respect of each Purpose we use your personal information for is set out in the table below.
- Where we need to comply with a legal or regulatory obligation (“Compliance with Law”).
- Where we have your specific consent to carry out the processing for the Purpose in question (“Consent”).

We have set out below, in a table format, the legal bases we rely on in respect of the relevant Purposes for which we use your personal information – for more information on these Purposes and the data types involved, see ‘How we use your personal information’.

Purpose	Categories of personal information involved	Legal basis
To respond to your comments, questions and requests	Contact and Request Information	Legitimate Interests We have a legitimate interest in offering you a good

		service, including by communicating with you where you have contacted us
To manage your account	Account Information	Contractual Necessity
To monitor the performance of our websites and mobile applications	Website Information and Mobile Information	Consent where applicable by law; otherwise Legitimate Interests We have a legitimate interest in ensuring the ongoing security and proper operation of our Online Services and associated IT services, systems, and networks
To serve interest-based advertising	Website Information and Mobile Information	Consent where applicable by law; otherwise Legitimate Interests We have a legitimate interest in offering you a good service, including by allowing you to customize your experience with advertising relevant to your interests
To personalize our Online Services	Public Information	Consent where applicable by law; otherwise Legitimate Interests We have a legitimate interest in offering you a good service which is personalized to you and that remembers your selections and preferences
To host or manage any events that we may sponsor or be a participant	Audiovisual Information	Legitimate Interests We have a legitimate interest in promoting the products and services offered by our business
To send you personalized direct marketing communications based on your needs and interests	Marketing Information	Consent where applicable by law; otherwise Legitimate Interests We have a legitimate interest in promoting the products and services offered by our business and sending marketing communications for that purpose
To comply with our legal and contractual obligations and protect our legal interests	Any and all data types relevant in the circumstances	Compliance with Law Legitimate Interests Where Compliance with Law is not available, we have a legitimate interest in participating in, supporting, and following legal process and requests, including through cooperation with authorities. We and any relevant third parties may also have a legitimate interest of ensuring the protection, maintenance, and enforcement of our and their rights, property, and/or safety
To create aggregated, de-identified and/or anonymized data		Legitimate Interests We have a legitimate interest in ensuring that our Online Services and how we use your personal data are not intrusive, to the extent possible.



**Personal Data Transfers outside of Europe.** Rubrik transmits some of your personal data to countries where the data protection laws may not provide a level of protection equivalent to the laws in your jurisdiction. All transfers of your personal data from Europe to a country that has not been deemed to provide an adequate level of protection will be based upon an adequacy decision or governed by appropriate safeguards in accordance with the GDPR (e.g., the European Commission’s Standard Contractual Clauses or the UK’s International Data Transfer Agreement). Any onward transfer is subject to appropriate onward transfer requirements as required by applicable law.

**Data Retention.** Rubrik keeps personal data as long as required to provide our Online Services to you and comply with applicable laws. For example, if you register for an account on the Online Services, we retain your personal data for as long as you have an account with us and then for only as long as required for us to comply with applicable laws, discharge our contractual obligations to you, or defend our legal interests in connection with any claim or defense we could face before any formal dispute resolution body. We take reasonable measures to ensure that personal data is deleted, erased or anonymized as soon as possible once the purposes for which personal data was collected have been fulfilled.

**Data Subject Rights.** European data protection laws give you certain rights regarding your personal data. If you are located in Europe, you may ask us to take the following actions in relation to your personal data that we hold:

- **Access.** Provide you with information about our processing of your personal data and give you access to your personal data.
- **Correct.** Update or correct inaccuracies in your personal data.
- **Delete.** Delete your personal data where there is no good reason for us continuing to process it - you also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Transfer.** Transfer a machine-readable copy of your personal data to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal data, for example if you want us to establish its accuracy or the reason for processing it.
- **Object.** Object to our processing of your personal data where we are relying on Legitimate Interests – you also have the right to object where we are processing your personal data for direct marketing purposes.
- **Withdraw Consent.** When we use your personal data based on your consent, you have the right to withdraw that consent at any time.

You can exercise such rights by accessing the information in your account or by submitting a request via <https://www.rubrik.com/legal/privacy-request> or via email to [privacy@rubrik.com](mailto:privacy@rubrik.com). Please note that these rights may be subject to limitations and conditions under the GDPR or applicable national data protection laws.

**Your Right to Complain.** In addition to your rights outlined above, if you are not satisfied with our response to a request you make, or how we process your personal data, you can make a complaint to the data protection regulator in your habitual place of residence.

- For users in the European Economic Area – the contact information for the data protection regulator in your place of residence can be found here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)
- For users in the UK – the contact information for the UK data protection regulator is below:

The Information Commissioner's Office  
Water Lane, Wycliffe House  
Wilmslow - Cheshire SK9 5AF  
Tel. +44 303 123 1113  
Website: <https://ico.org.uk/make-a-complaint/>

**Your Choices.** You are not required to provide any personal data to Rubrik, but if you do not provide any personal data to Rubrik, you may not be able to use our Online Services or conduct business with us effectively. You can use our Online Services without consenting to cookies that are not strictly necessary; the only consequence is that our Online Services will be less tailored to you.

**Profiling.** Rubrik does not use in connection with our Online Services automated decision-making in a way that produces legal effects concerning you or which significantly affects you.

### **Data Privacy Framework Participation**

Rubrik complies with the EU-U.S., UK Extension to EU-U.S., and Swiss-U.S. Data Privacy Framework Programs as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information transferred from the European Union, United Kingdom, and Switzerland to the United States. Rubrik has certified to the Department of Commerce that it adheres to the Data Privacy Framework Principles. If there is any conflict between the terms in this privacy policy and the Data Privacy Framework Principles, the Data Privacy Framework Principles shall govern. To learn more about the Data Privacy Framework program, please visit: <https://www.dataprivacyframework.gov/s/and> to view our certification, please visit: <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000GwHuAAK&status=Active>. Additionally, Rubrik's Data Privacy Framework Notice can be found: [HERE](#)

Rubrik's privacy practices, described in this Privacy Policy, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal information transferred among participating APEC economies. More information about the APEC framework can be found here: [www.cbprs.org](http://www.cbprs.org)

### **European Contacts**

If you have a privacy concern, complaint, a question for the data protection officer for your region, or a question or comments regarding this Supplemental European Privacy Statement, please contact us at: [privacy@rubrik.com](mailto:privacy@rubrik.com); or via [webform](#). You can also contact any of our affiliates directly at the following:

<p><b>Rubrik Cloud Data Management Limited</b> 4th Fl 103/104 O'Connell Street Limerick V94 AT8 Ireland</p>	<p><b>Rubrik France SaS</b> 43-47 avenue de la Grande Armee 75116 Paris France</p>	<p><b>Rubrik The Netherlands B.V.</b> <b>Hoogoorddreef 54</b> 1101 BE Amsterdam The Netherlands</p>
<p><b>Rubrik UK Limited</b> 55 Baker Street London W1U 7EU England</p>	<p><b>Rubrik Germany GmbH</b> Bethmannstraße 50-54 60311 Frankfurt AM Main Germany</p>	<p><b>Rubrik Switzerland GmbH</b> Schiffbaustrasse 2 8005 Zurich Switzerland</p>
<p><b>Rubrik Italy S.r.l.</b> Viale Abruzzi 94 20131 Milano (MI) Italy</p>		