

Smartsheet Privacy Notice

Last Updated: October 2019

At Smartsheet, we understand that you need to know how data about you (i.e., personal data) is used. The Smartsheet Privacy Notice is comprised of this page and the notices below which describe how we collect, use, and share personal data and explain your related rights and choices. 'We' are Smartsheet Inc. 'You' may be a visitor to one of our websites including www.smartsheet.com ('Sites') or a user of our internet-delivered work collaboration services and applications, including our mobile applications, or any of our services available through the Sites ('Services').

Specific Notices

Who We Are

Your Choices

Your Rights

Personal Data Retention

How We Protect Personal Data

Children

International Transfers and Privacy Shield Notice

Changes to this Notice

How to Contact Us

English Version Controls

Specific Notices

Together with the information on this page, the following notices describe our use of your personal data based on how we interact with you:

General Privacy Notice. When we interact with you outside the Services (e.g., on our Sites, during events, or through surveys).

Services Privacy Notice. When you sign up for or use Services which we provide to you or, if you are an organizational user, to our customer with whom you have a relationship (e.g., employer/employee).

Cookie Notice. When data is collected automatically from your device by way of cookies and other tracking technologies.

Applicant Notice. When you apply for a job with Smartsheet.

Who We Are

Smartsheet Inc. is headquartered in the United States, with offices in Washington and Massachusetts. You can learn about us and our Services [here](#).

Smartsheet Inc. may share personal data with our affiliated companies for our or our affiliate's internal business purposes (e.g., when you purchase an affiliate's services from Smartsheet). The following privacy notices are tailored for the different ways your personal data may be collected, used, shared and processed by different Smartsheet lines of business:

- Artefact Product Group LLC dba 10,000 Ft
- TernPro, Inc. d/b/a Slope
- Smartsheet UK Ltd. formerly known as Helpa Ltd. and Converse.ai

Your Choices

Marketing Communications. You can opt out of being contacted by us for marketing or promotional purposes by following the instructions in marketing emails we send or by unsubscribing [here](#).

Custom Audiences. If you'd prefer we do not include you in custom audiences, submit this form.

Cookies. Please visit our Cookie Notice to learn about and exercise your choices relating to cookies.

Your Rights

You may have certain rights relating to your personal data under local data protection laws or based on your use of our Services. For example:

European Economic Area

Erasure. You can ask us to erase your personal data if certain conditions are met. We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary for compliance with a legal obligation or for the establishment, exercise, or defense of legal claims.

Objection. You can object to any processing of your personal data which is done on the basis of our 'legitimate interests', if you believe your fundamental rights and freedoms outweigh our legitimate interests. Once you have objected, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms. In addition, you can object to the processing of your personal data for direct marketing

purposes, which includes profiling to the extent that it is related to such direct marketing. We will then cease the processing of your personal data for direct marketing purposes.

Portability. You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another data controller, but only where our processing is based on your consent and the processing is carried out by automated means.

Rectification. You can ask us to correct information; we may verify the accuracy of the data before rectifying it.

Restriction. You can ask us to restrict (i.e., keep but not use) your personal data, but only where: its accuracy is contested (see 'Rectification' above), to allow us to verify its accuracy; the processing is unlawful, but you do not want it erased; it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise, or defend legal claims; you have exercised the right to object, and verification of any overriding grounds is pending. We can continue to use your personal data following a request for restriction where we have your consent; to establish, exercise, or defend legal claims; or to protect the rights of another.

Withdrawal of Consent. You can withdraw your consent where processing is based on a consent you have previously provided. If you have questions about how to withdraw a consent you had provided, please complete this form.

Exercise of Rights. To exercise your rights please contact us using this form or using the contact details provided under the "How to Contact Us/Dispute Resolution" heading. We do not discriminate based on whether you choose to exercise your choices and rights and will not, based on your exercise of rights, deny the Services to you; charge you different rates (including through penalties or discounts/benefits); provide a different level or quality of Services; or suggest you may receive such different treatment.

California

Access. You can ask us to confirm we're processing your personal data, provide you with details about such processing, and give you a copy of your personal data.

Erasure. You can ask us to erase your personal data if certain conditions are met. We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary for compliance with a legal obligation or for the establishment, exercise, or defense of legal claims.

Portability. You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it 'ported' directly to another data controller, but only where our processing is based on your consent and the processing is carried out by automated means.

Exercise of Rights. To exercise your rights please contact us using this form or using the contact details provided under the "How to Contact Us/Dispute Resolution" heading. We do not discriminate based on whether you choose to exercise your choices and rights and will not, based on your exercise of rights, deny the Services to you; charge you different rates (including through penalties or discounts/benefits); provide a different level or quality of Services; or suggest you may receive such different treatment.

Mobile users

Access. You can ask us to confirm we're processing your personal data, provide you with details about such processing, and give you a copy of your personal data.

Erasure. You can ask us to erase your personal data if certain conditions are met. We are not required to comply with your request to erase your personal data if the processing of your personal data is necessary for compliance with a legal obligation or for the establishment, exercise, or defense of legal claims.

Withdrawal of Consent. You can withdraw your consent where processing is based on a consent you have previously provided. If you have questions about how to withdraw a consent you had provided, please complete this form.

Exercise of Rights. To exercise your rights please contact us using this form or using the contact details provided under the "How to Contact Us/Dispute Resolution" heading. We do not discriminate based on whether you choose to exercise your choices and rights and will not, based on your exercise of rights, deny the Services to you; charge you different rates (including through penalties or discounts/benefits); provide a different level or quality of Services; or suggest you may receive such different treatment.

Data Retention

We keep your personal data for as long as reasonably necessary for the purposes set out in our notices (see 'How We Use Personal Data' in the applicable notice). We'll keep your personal data longer if required for tax or accounting purposes, to ensure we would be able to defend or raise a claim, or where we have a specific need - though we will generally not keep personal data for longer than seven years following the last date of communication with you. Where personal data is no longer required, we anonymize or dispose of it in a secure manner.

How We Protect Your Information

We have implemented technical, physical, and administrative safeguards to protect your personal data. However, no company, including Smartsheet, can guarantee the absolute security of Internet communications.

Children’s Personal Data

Our Sites are not directed toward children under 18 and we don’t knowingly collect personal data from minors. If you are under 18, please do not use the Sites or Services or share personal data with us. If you learn that anyone younger than 18 has unlawfully provided us personal data, please contact us.

International Transfers and Privacy Shield Notice

Personal data we collect may be transferred to, used, and stored in the United States or other jurisdictions in which Smartsheet, our affiliates, or service providers are located; these locations (including the United States) may not guarantee the same level of protection of personal data as the one in which you live. Smartsheet assesses the circumstances involving all cross-border data transfers and has suitable safeguards in place to require that your personal data will remain protected in accordance with this notice.

Smartsheet participates in the EU-U.S. and U.S.-Swiss Privacy Shield Frameworks and Principles (collectively, the “Privacy Shield Principles”). We will comply with the Privacy Shield Principles with respect to personal data transferred to the United States from the European Economic Area (‘EEA’), the United Kingdom, and Switzerland. You can review the Privacy Shield Principles, learn more about Privacy Shield, and view our Privacy Shield certification at <https://www.privacyshield.gov/>. Smartsheet’s commitments under the Privacy Shield Principles are subject to the investigatory and enforcement powers of the United States Federal Trade Commission. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Smartsheet is and will remain liable for the processing of personal data it receives under each Privacy Shield Framework and subsequently transfers to a third party acting as an agent on its behalf (see ‘How We Share Personal Data’ in the applicable notice). We comply with the Privacy Shield Principles for all onward transfers of personal information from the EEA, including the onward transfer liability provisions. If there is a conflict between the terms of this notice and the Privacy Shield Principles, the Privacy Shield Principles will govern.

In addition, Smartsheet has implemented the European Commission’s Standard Contractual Clauses for transfers of personal data between our affiliated companies, which require all of our affiliates to protect personal data they process from the EEA in accordance with European Union data protection law. We have implemented similar appropriate safeguards where legally required with our third party service providers and partners; details can be provided upon request.

Changes to this Notice

We may update this notice to reflect changes to our privacy practices, changing technologies, industry practices, regulatory requirements, or for other reasons. If we make any material changes that affect the way we treat your

data, we will notify you by email, through the Sites, or by other legally acceptable means. We encourage you to periodically review this notice for the latest information on our privacy practices.

How to Contact Us/Dispute Resolution

You have the right to complain to a data protection authority about our collection and use of your personal data, but we encourage you to reach out to us first. The best way to reach us is by filling out this form. Smartsheet's Privacy Counsel serves as Smartsheet's data protection contact and can be reached at:

Webform: Contact Privacy Form

Email: privacy@smartsheet.com

Address: Attn: Legal - Privacy Office, 10500 NE 8th Street, Suite 1300, Bellevue WA 98004

Residents of the EEA. The controller of your personal data is Smartsheet Inc. Where processing is undertaken by our affiliated companies, they are joint controllers with Smartsheet Inc. for your personal data. You may contact our EU Representative, Smartsheet UK Ltd, at:

Webform: Contact Privacy Form

Email: privacy@smartsheet.com

Address: Attn: Smartsheet Legal, Clarendon House, 116 George St, Edinburgh EH2 4LH

Complaints or Questions About Our Privacy Shield Certifications. If you have any questions or complaints regarding our Privacy Shield Certification, please complete this form or email privacy@smartsheet.com. We will respond within 45 days of receiving your complaint and will promptly investigate and attempt to resolve it. If you reside in the EEA and your complaint cannot be resolved through this process, we will participate in the dispute resolution process administered by JAMS. For information about how to initiate a Privacy Shield claim with JAMS, please contact JAMS directly. Under certain conditions (described on the Privacy Shield website), you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

English Version Controls

Unless prohibited by local laws, non-English translations of this notice are provided for convenience only and in the event of any ambiguity or conflict between translations, the English version is authoritative and controls.

Smartsheet General Privacy Notice

This notice applies where we process personal data through our Sites, during events, or in any other interactions with you outside of your use of the Services.

Personal Data We Collect

How We Use Personal Data

How We Share Personal Data

Blogs; Forums

Linked Sites; Third Party Widgets

Who We Are

Your Choices

Your Rights

Personal Data Retention

How We Protect Personal Data

Children

International Transfers and Privacy Shield Notice

Changes to this Notice

How to Contact Us

English Version Controls

Personal Data We Collect

We may collect personal data directly from you, from third parties, or automatically when you use the Sites. We collect this personal data for the purposes outlined below in 'How We Use Personal Data'. See this table for categories of personal data we collect.

How We Use Personal Data

We will only use your personal data if we have a lawful basis to do so, as illustrated by this table. Specifically, we use your personal data at your instruction or as follows:

Providing and Personalizing our Sites. To operate and administer the Sites and to provide you with the content you choose to access or request; to tailor web content we display to you in order to offer location customization (e.g., setting a default language) and to otherwise personalize your experience using the Sites. We use cookies and similar tracking technologies to automatically collect your personal data for this purpose (see our Cookie Notice).

Personalizing Events. To tailor event invitations we send or display to you in order to offer location customization (e.g., local event offerings). We use cookies and similar tracking technologies to automatically collect your personal data for this purpose (see our Cookie Notice).

Identifying Customer Opportunities. To identify and assess potential new users through tools like LinkedIn Sales Navigator, and to engage with individuals responding to web content produced by Smartsheet.

Sending Marketing Communications. For direct marketing, promotional, and other non-transactional communications (e.g., newsletters, calls, SMS, or push notifications) in order to share information about special offers, promotions, and events or to otherwise contact you about Smartsheet products or information we think may interest you, in accordance with your marketing preferences.

Displaying, Measuring Personalized Advertisements. To provide more relevant advertising to you on the Sites or third party platforms; to conduct related marketing research (e.g., by measuring the success of targeted advertising campaigns). We use cookies and similar tracking technologies to automatically collect your personal data for this purpose (see our Cookie Notice).

Managing Event Registrations and Contests. To plan and host events or webinars you've registered for or attend, including sending related communications to you; and to provide contests, promotions, and sweepstakes you've chosen to participate in or register for (contests may have additional rules relating to how we process your personal data).

Analytics and Improvement. To better understand how you access and use the Sites and Services; and for other research and analytical purposes, such as to evaluate and improve the Sites and to develop additional services, content, and features (e.g., if you choose to participate in a survey or user-interface study, we may use your email address to reach out with follow-up questions or additional studies).

Protect Legal Rights and Prevent Misuse. To protect the Sites, Services, and the rights of users and other individuals; to prevent unauthorized access and other misuse; and where we believe necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the

safety of any person, or violations of our terms of use or this notice. We may use machine or deep learning technologies for these purposes (e.g., for fraud prevention or detection).

Comply with Legal Obligations. To comply with the law or legal proceedings (e.g., we may disclose data in response to lawful requests by public authorities, including responding to national security or law enforcement requests).

General Business Operations. Where necessary to the administration of our general business, accounting, recordkeeping, and legal functions.

How We Share Personal Data

We will not sell your personal data to a third party or allow a third party to use personal data we provide for its own marketing purposes. We may share information about you with your consent, at your request, or as follows:

To Our Service Providers. We use third party service providers to process your personal data to assist us in business and technical operations. Smartsheet has data processing agreements with such service providers limiting their use of and access to personal data to specific purposes. They provide services relating, but not limited to fraud detection and prevention, billing, customer support, internet and connectivity, marketing (direct mail, email, lead generation), event organizing, security, user experience.

To Infrastructure Processors. We use third parties for some of the infrastructure used to host content and personal data we process, including cloud providers. Smartsheet has data processing agreements with such service providers and their use of and access to personal data is limited to specific purposes.

To Affiliates. We may share your personal data with our affiliates for marketing or lead generation and qualification purposes.

As Custom Audiences. We may share a hashed (scrambled) version of your email address, name, city, state, or similar information with advertising partners to assist us in reaching you with more relevant advertisements outside of the Sites (and to measure the success of such campaigns); these partners are not permitted to retain, use, or disclose this information for their own third-party marketing purposes. If you'd like to opt out of custom audiences, complete this form.

As Required by Law. We release information about you if we believe we must do so to comply with the law or a subpoena, bankruptcy proceeding, or similar legal process. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

To Protect Rights. We may disclose information about you, such as your name, contact information, and billing information, to enforce our agreements with you or to protect the rights and safety of Smartsheet, our customers, our users, and the general public, or as evidence in litigation in which we are involved.

As Aggregate and Anonymized Information. We may share aggregate or anonymized information about you with our third party service providers for our internal business purposes which may include marketing, advertising, research, or similar purposes.

In a Business Transaction. If Smartsheet is involved in a merger, acquisition, or sale of all or a portion of its assets, your information may be transferred to the acquiring entity as part of the transaction (provided that we inform the buyer it must use your personal data only for the purposes disclosed in this notice), and may also be reviewed as part of the due diligence review for the transaction (e.g., we may need to provide a list of all customer accounts and payment histories).

Blogs; Forums; Testimonials

Our Sites may contain publicly accessible blogs and interactive features (e.g., the community website). Any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your information from our blog or community forum, please complete this form. With your consent, we may publish testimonials you share with us, which could contain personal data such as your full name and other information you choose to share. If you wish to update or remove your testimonial, please complete this form.

Linked Sites; Third Party Widgets

Links to Other Websites. Our Sites may include links to other websites with privacy practices that may differ from ours. Any information you submit to a website not belonging to Smartsheet is governed by that site's privacy statement, not this one.

Plugins and Social Media Widgets. Our Sites may include social media features and widgets ('widgets'), such as a 'share this' button or other interactive mini-programs. Widgets can be used to provide you specific services from other companies (e.g., displaying the news, opinions, music, etc.). Personal data such as your email address may be collected through widgets. Cookies may also be set by widgets to enable them to function properly. Widgets displayed on our Sites are not hosted by Smartsheet and are subject to the privacy policies of the third party company providing the widget, and not this notice.

General Privacy Notice
Categories of Personal Data Collected

Purposes of Processing	Categories of Personal Data Processed For Each Purpose	Legal Bases of Processing (EU Users)*	How We Gather Data From You
<p>Providing Our Sites,</p> <p>Personalization, or</p> <p>Event Registration & Contests.</p>	<p><i>Directly from You:</i></p> <ul style="list-style-type: none"> • name, email address, physical address, phone number, and other similar contact information; • professional and organizational profile information, such as title, department, and company size/revenue; • payment information (e.g., partial credit card number and billing address); • feedback, testimonials, inquiries, and non-Service related phone conversations, chats or emails; • image (still or video), voice, and other identifiers when you attend an event or use certain features on the Sites (e.g., a profile photo in Smartsheet Community); • location information (e.g., from your language preference on the Sites or a provided address); and • any additional information you choose to share on the Sites. <p><i>From Third Parties:</i></p> <ul style="list-style-type: none"> • event registration information (e.g., name, email address, company, 	<p>Necessary to enter into or perform a contract with You (upon your request, or as necessary to make the Sites available),</p> <p>Legitimate interests**, or</p> <p>With your consent.</p>	<p><i>We may collect personal data directly from you when you:</i></p> <ul style="list-style-type: none"> • interact with the Sites or community features; • search for or indicate interest in the Services; • register for or attend an event attended or hosted by Smartsheet; • communicate with us by phone, email, or other means; and • fill out a webform, questionnaire, or other information request. <p><i>We may collect personal data automatically when you:</i></p> <ul style="list-style-type: none"> • interact with our Sites; • download content from our Sites; and • communicate with us by email (e.g., opening

	<p>title, etc.) from event coordinators or vendors; and</p> <ul style="list-style-type: none"> location of devices, for example through IP look-up. <p><i>Automatically:</i></p> <ul style="list-style-type: none"> email addresses and phone numbers used to contact us; and network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider. 		<p>emails or accessing links in emails).</p>
<p>Marketing & Promotions,</p> <p>Customer Opportunities, or</p> <p>Advertising.</p>	<p><i>Directly from You:</i></p> <ul style="list-style-type: none"> location information (e.g., from your language preference on the Sites or a provided address); professional organizational profile information, such as your title, department, and company size/revenue; and usernames, aliases, and other authentication information with respect to optional features (e.g., Smartsheet Community). <p><i>From Third Parties:</i></p> <ul style="list-style-type: none"> name, email address, physical address, phone number, and other similar contact information; and business contact information, including mailing addresses, job 	<p>Legitimate interests**, or</p> <p>With your consent.</p>	<p><i>We may collect personal data directly from you when you:</i></p> <ul style="list-style-type: none"> interact with the Sites or community features; search for or indicate interest in the Services; register for or attend an event attended or hosted by Smartsheet; communicate with us by phone, email, or other means; and fill out a webform, questionnaire, or other

	<p>titles, email addresses, phone numbers, IP addresses, social media profiles, LinkedIn URLs and custom profiles.</p> <p><i>Automatically:</i></p> <ul style="list-style-type: none"> • network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider; and • identifiers and information contained in cookies (see our Cookie Notice). 		<p>information request.</p> <p><i>We may collect personal data automatically when you:</i></p> <ul style="list-style-type: none"> • interact with our Sites; • download content from our Sites; and • communicate with us by email (e.g., opening emails or accessing links in emails).
<p>Analytics & Improvement</p>	<p><i>Directly from You:</i></p> <ul style="list-style-type: none"> • your name, email address, physical address, phone number, and other similar contact information if you choose to participate in a survey or user interface study. <p><i>From Third Parties:</i></p> <ul style="list-style-type: none"> • location of devices, for example through IP look-up. <p><i>Automatically:</i></p> <ul style="list-style-type: none"> • identifiers and information contained in cookies (see our Cookie Notice); • the full Uniform Resource Locators (URL) clickstream event data on our Sites, including referrer data, click event data (including date and time), content 	<p>Legitimate interests**, or</p> <p>With your consent.</p>	<p><i>We may collect personal data directly from you when you:</i></p> <ul style="list-style-type: none"> • interact with the Sites or community features; • search for or indicate interest in the Services; • register for or attend an event attended or hosted by Smartsheet; • communicate with us by phone, email, or other means; and • fill out a webform, questionnaire, or other

	<p>you viewed or search queries on our Sites, performance data (e.g., page response times), downloads, HTTP response codes, and page interaction information (e.g., clicks); and</p> <ul style="list-style-type: none"> network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider. 		<p>information request.</p> <p><i>We may collect personal data automatically when you:</i></p> <ul style="list-style-type: none"> interact with our Sites; download content from our Sites; and communicate with us by email (e.g., opening emails or accessing links in emails).
<p>Protect Rights/Prevent Misuse,</p> <p>Comply with Legal Obligation, or</p> <p>General Business Operations.</p>	<p><i>Directly From You:</i></p> <ul style="list-style-type: none"> name, email address, physical address, phone number, and other similar contact information. <p><i>Automatically:</i></p> <ul style="list-style-type: none"> network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider; and computer and device information, such as device, application, or browser type and version, browser plug-in type and version, operating system, or time zone setting. 	<p>Compliance with a legal obligation; or</p> <p>Legitimate interests**.</p>	<p><i>We may collect personal data directly from you when you:</i></p> <ul style="list-style-type: none"> interact with the Sites or community features; search for or indicate interest in the Services; register for or attend an event attended or hosted by Smartsheet; communicate with us by phone, email, or other 5means; and fill out a webform, questionnaire, or other

			<p>information request;</p> <p><i>We may collect personal data automatically when you:</i></p> <ul style="list-style-type: none"> • interact with our Sites; • download content from our Sites; and • communicate with us by email (e.g., opening emails or accessing links in emails).
--	--	--	--

*For the personal data from the EU that we process, this column describes the relevant legal bases under GDPR and local implementing laws of EU member states for processing personal data from the EU; this does not limit or modify the obligations, rights, and requirements under the privacy laws of non-EU jurisdictions. Additional information about our legal bases for processing particular categories of data is available upon request.

** For the personal data from the EU, the processing is in our legitimate interests, which are not overridden by your interests and fundamental rights.

Smartsheet Services Privacy Notice

This notice applies with respect to personal data we process when you sign up for or use the Services.

Scope

Personal Data We Collect

How We Use Personal Data

How We Share Personal Data

Integrations; Notifications; Linked Websites

Mobile Application

Choices Relating to Your Use of the Services

Who We Are

Your Choices

Your Rights

Personal Data Retention

How We Protect Personal Data

Children

International Transfers and Privacy Shield Notice

Changes to this Notice

How to Contact Us

English Version Controls

Scope

Content Out of Scope. Our Services permit customers to share and manage information by uploading and submitting 'content' that can be shared, stored, and accessed through the Services. This notice does not cover that

content, including any personal data contained in it. Customers control the nature of the content and are the data controllers. We are a data processor of such content, which means we only use it as directed by customers.

Sharing With Other Users of the Services. Some of the features and functionality of the Services involve disclosure of your personal data to other users of the Services; for example, your name, email address, and profile image may be displayed when a user views collaborators on a “sheet” and users may see the history details on a sheet (e.g., your email, access/edits, date and time stamp, etc.). Customers, as data controllers, control the disclosure of content with other users of the Services. We, as a data processor, follow instructions from customers with respect to how their content is shared with other users of the Services.

Organizational Users. When you use the Services on behalf of an organization (e.g., your employer), your use is administered and provisioned by your organization in accordance with its own policies regarding the use and protection of personal data. With respect to personal data contained in content, we are collecting and processing your personal data on behalf of your organization, who is the data controller. Smartsheet is not responsible for the privacy or security practices of our customers. We may also share personal data with your organization about your use of the Services that may include technical details (e.g., metadata) relating to your content or usage of the Services. If you have questions about how your data is being accessed or used by your organization, please refer to your organization's privacy policy and direct your inquiries to your organization’s system administrator. Please note that if you lose access to your account (e.g, change of employment), you may lose access to content associated with that account.

Personal Data We Collect

We collect personal data directly from you, from third parties, and automatically when you use the Services. We collect this personal data for the purposes outlined below in ‘How We Use Personal Data’. If we cannot collect this data, we may be unable to on-board you as a customer or provide the Services to you. See this table for categories of personal data we collect.

How We Use Personal Data

We will only use your personal data if we have a lawful basis to do so, as illustrated by this table. Specifically, we use your personal data at your instruction or as follows:

Provision of Services. To provide and operate our Services, fulfill your orders and requests, process your payments, for bug and error reporting and resolution, to perform upgrades and maintenance, and for similar purposes. This may include the use of machine or deep learning technologies, as described in the *Analytics and Improvement* paragraph below.

Customer Support. To communicate with you about your use of the Services; to respond to your communications, complaints and inquiries; to provide technical support; and for other customer service and support purposes.

Personalization. To tailor content we send or display to you in order to offer location customization (e.g., setting a default language) and to otherwise personalize your experience using the Services.

Identifying Customer Opportunities. To assess potential customer opportunities as they relate to engaging new users, meeting the demands of our customers, and enhancing particular users' experiences (e.g., engaging with customer user groups).

Analytics and Improvement. To better understand how our users access and use the Services, and for other research and analytical purposes (e.g., to evaluate and improve the Services and develop additional products, services, and features). We may use machine or deep learning technologies for these purposes which may allow us to provide users predictive tips and other features (e.g., suggestions for column types or text).

Protect Legal Rights and Prevent Misuse. To protect the Services and the rights of users and other individuals; to prevent unauthorized access and other misuse; and where we believe necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, or violations of our terms of use or this notice. We may use machine or deep learning technologies for these purposes (e.g., for fraud prevention or detection).

Comply with Legal Obligations. To comply with the law or legal proceedings; for example, we may disclose information in response to lawful requests by public authorities, including responding to national security or law enforcement requests.

General Business Operations. Where necessary for the administration of our general business, accounting, recordkeeping, and legal functions.

How We Share Personal Data

We will not sell your personal data to a third party or allow a third party to use personal data we provide for its own marketing purposes. We may share information about you with your consent, at your request (including when you use Integrations or Notifications), or as follows:

To Your Organization. If you use Smartsheet on behalf of an organization (e.g., your employer), that organization may (i) access information associated with your use of the Services including usage and other data (e.g., who has accessed, shared, amended, created, edited, or deleted content), and the contents of the communications and files associated with your account; (ii) control and administer your account, including controlling privacy-related

settings (e.g., in-app profile settings including choices relating to displaying a profile image); and (iii) access and control content (as noted above, content is outside the scope of this notice).

To Resellers. If you sign up for certain products or services (e.g., free trials) and you are located outside the United States, we may share your personal data with a Smartsheet reseller so they can contact you about our products, services, and offers. We will disclose such sharing when you sign up for the applicable product or service, and will, where required by law, obtain your consent or allow you to opt-out from such sharing. If you purchase Services through a reseller (regardless of location), we may share certain information about your account and feature usage with the reseller (or their affiliate) in furtherance of their relationship with you. Resellers are independent data controllers of your personal data.

Payment Processors. If you use a third party to facilitate your payment obligations, we will share certain account-usage and billing-related information about your account with such third party for billing and business administration purposes. Payment processors are independent data controllers of your personal information.

To Our Service Providers. We use third party service providers to process your personal data to assist us in business and technical operations. Smartsheet has data processing agreements with such service providers limiting their use of and access to personal data to specific purposes. They provide services relating to, for example, customer relationship management, communication, fraud detection and prevention, billing, customer support, internet and connectivity, marketing, security, training, and user experience.

To Infrastructure Processors. We use third parties for some of the infrastructure used to host personal data we process, including cloud providers. Smartsheet has data processing agreements with such service providers limiting their use of and access to personal data to specific purposes.

To Affiliates. If you purchase one of our affiliate's services through Smartsheet, we may share your personal data with the affiliate to provision and service your account.

In Transactions Involving Third Parties. We may make services, software, and content provided by third-parties available for use on or through the Services; if you engage with a third party provider of such features, you will be notified or otherwise made aware of personal data being shared related to those transactions with that third-party.

As Required by Law. We release information about you if we believe we must do so to comply with the law or a subpoena, bankruptcy proceeding, or similar legal process.

To Protect Rights. We may disclose information about you, such as your name, contact information, and billing information, to enforce our agreements with you or to protect the rights and safety of Smartsheet, our customers, our users, and the general public, or as evidence in litigation in which we are involved.

As Aggregate and Anonymized Information. We may share aggregate or anonymized information about you with our third party service providers for our internal business purposes which may include marketing, advertising, research, or similar purposes.

In a Business Transaction. If Smartsheet is involved in a merger, acquisition, or sale of all or a portion of its assets, your information may be transferred to the acquiring entity as part of the transaction (provided that we inform the buyer it must use your personal data only for the purposes disclosed in this notice), and may also be reviewed as part of the due diligence review for the transaction. For example, we may need to provide a list of all customer accounts and payment histories.

Integrations; Notifications; Linked Websites

Integrations. Our Services may provide access via connectors and integrations ('integrations') to your third party accounts such as Tableau, Slack, or Facebook. Integrations can be used to pull and/or push information from/to the Services, and to enable the applicable third party to receive notifications, such as sheet updates, from the Services. Any information you authorize to be transferred from the Services to an integration is governed by the third party's privacy statement, not this one. We encourage you to carefully read the privacy statement of any third party you authorize to receive information from the Services.

Sending Notifications. Our Services allow you to send notifications (e.g., update requests) to other individuals through email, SMS, and other third-party messaging platforms (e.g., Slack, Facebook Messenger, and Microsoft Teams). Any information you authorize to be transferred from the Services is governed by the third party's privacy statement, not this one. We encourage you to carefully read the privacy statement of any third party you authorize to receive information from the Services.

Links to Other Websites. Our Services include features which allow you to link to other websites with privacy practices that may differ from ours. Any information you submit to a website not belonging to Smartsheet is governed by that site's privacy statement, not this one.

Mobile Application; Geolocation Data

If you choose to download the Smartsheet mobile application ('mobile app'), we may receive additional personal data from your mobile device, in accordance with your preferences. The mobile app may have access to your device's camera or its geographic location, depending on the features you enable in the Services. Through your device settings, you have the ability to configure what functionality (e.g., your device's camera or mobile location) the mobile app can access and we will only access this information at your request. The mobile app may also gather information related to your use of the mobile app (e.g., device identification, login credentials, language, and time zone); device event information (e.g., crashes, system activity, and hardware settings); and information

regarding your interaction with the mobile app, which we may use to provide and improve the mobile app. If you use the services on behalf of an organization, information obtained by the mobile app may be accessible to your organization. For additional information about your use of the mobile app, see the Mobile End User License Agreement.

Choices Related to Your Use of the Services

In addition to “Your Rights” described here, you have the following choices in relation to your use of the Services:

Closing Your Account. If you wish to close your account, you may do so by logging in and using the Account Administration settings or by submitting this form . If you shared any content or information through our Services with other users, it will continue to be accessible to those users.

Correcting Your Account. If you are not using the Services on behalf of your organization, you may log in and use the Account Administration settings or submit this form to access or update your account profile information. If you are an organizational user, you may login log in and use the Account Administration settings or contact an administrator on your account to access or update account profile information. If you have questions about how to withdraw a consent you had provided, please complete this form.

Services Privacy Notice Table

Categories of Personal Data Collected

Purposes of Processing	Categories of Personal Data Collected For Each Purpose	Legal Bases of Processing (EU Users)*
Provision of Services, or Customer Support.	<p><i>Directly from You:</i></p> <ul style="list-style-type: none"> • your name, email address, physical address, phone number, and other similar contact information • professional and organizational profile information, such as title, department, and company size/revenue; • payment information, including partial credit card number and billing address; • content of feedback, testimonials, inquiries, support requests, and any phone conversations, chat sessions and emails with or to us; and • your image (still or video), voice, and other identifiers that are personal to you when you use certain features on the Services. <p><i>From Third Parties:</i></p> <ul style="list-style-type: none"> • your employer may provide your email address in order to provision your account; • subscription, purchase, support, or other information about your interactions with products and services offered by us, our affiliates, or third parties (e.g., Smartsheet global resale partners) in relation to the Services; • providers of business contact information, including mailing addresses, job titles, email addresses, phone numbers, IP addresses, social media profiles, LinkedIn URLs and custom profiles; • payment information, including partial credit card and billing address from our payment processors; • usernames, aliases, and other authentication and security credential information from third party accounts, for example if you choose to use single sign-on services (e.g., Google OpenID, Skype, and Microsoft Single Sign-On); and • search results and links, including lead generation tools and paid listings. <p><i>Automatically:</i></p>	<p>Necessary to enter into or perform a contract with you (upon your request, or as necessary to make the Services available),</p> <p>Establish, defend or protect legal interests,</p> <p>Compliance with law, or</p> <p>Legitimate interests**.</p>

	<ul style="list-style-type: none"> • email addresses and phone numbers used to contact us; • authentication and security credential information; • the geo-location of your device or computer when using certain features in the Services; • the clickstream through the Services (including date and time), performance data (e.g., page response times), download errors, and page interaction information (e.g., clicks); and • identifiers and information contained in cookies (see our Cookie Notice). 	
Customer Opportunities	<p><i>Directly from You:</i></p> <ul style="list-style-type: none"> • content of feedback, testimonials, inquiries, support requests, and any phone conversations, chat sessions and emails with or to us. <p><i>From Third Parties:</i></p> <ul style="list-style-type: none"> • providers of business contact information, including mailing addresses, job titles, email addresses, phone numbers, IP addresses, social media profiles, LinkedIn URLs and custom profiles. <p><i>Automatically:</i></p> <ul style="list-style-type: none"> • network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider. 	Legitimate interests**, or With your consent.
Personalization	<p><i>Directly from You:</i></p> <ul style="list-style-type: none"> • location information (e.g., from your language preference on the Sites or a provided address); and • information about your professional profile and your organization, such as your title, and you organization size and revenue. <p><i>From Third Parties:</i></p> <ul style="list-style-type: none"> • name, email address, physical address, phone number, and other similar contact information; and • business contact information, including mailing addresses, job titles, email addresses, phone numbers, IP addresses, social media profiles, LinkedIn URLs and custom profiles. 	Legitimate interests**, or With your consent.

	<p>Automatically:</p> <ul style="list-style-type: none"> identifiers and information contained in cookies (see our Cookie Notice); and network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider. 	
Analytics & Improvement	<p><i>Directly from You:</i></p> <ul style="list-style-type: none"> information provided in support or bug tickets, such as name, email address, company. <p><i>From Third Parties:</i></p> <ul style="list-style-type: none"> location of devices, for example through IP look-up. <p><i>Automatically:</i></p> <ul style="list-style-type: none"> identifiers and information contained in cookies (see our Cookie Notice); the clickstream through the Services (including date and time) page response times, download errors, and page interaction information (such as scrolling, clicks, and mouse-overs); and metrics, such as offering usage, occurrences of technical errors, diagnostic reports, your settings preferences, backup information, API calls, and other log.s 	Legitimate interests**, or With your consent.
Protect Rights and Prevent Misuse, General Business Operations, or Comply with Legal Obligation.	<p><i>Directly from You:</i></p> <ul style="list-style-type: none"> your name, email address, physical address, phone number, and other similar contact information. <p><i>Automatically:</i></p> <ul style="list-style-type: none"> network and connection information, such as the Internet protocol (IP) address used to connect your computer or other device to the Internet and information about your Internet service provider; and computer and device information, such as device, application, or browser type and version, browser plug-in type and version, operating system, or time zone setting. 	Compliance with a legal obligation, or Legitimate interests**.

* For the personal data from the EU that we process, this column describes the relevant legal bases under GDPR and local implementing laws of EU member states for processing personal data from the EU; this does not limit or modify the obligations, rights, and requirements under the privacy laws of non-EU jurisdictions. Additional information about our legal bases for processing particular categories of data is available upon request.

** For the personal data from the EU, the processing is in our legitimate interests, which are not overridden by your interests and fundamental rights.

With respect to each of the Purposes of Processing in the table above, we may collect personal data directly from you, your profile, or automatically, when you:

- purchase, sign up for, or log into the Services;
- configure or modify your personal settings;
- interact with or use the Services, including creating or modifying access permissions;
- communicate with us by phone, email, or other means to provision or otherwise service or support your account; and
- fill out a webform, questionnaire, or other information request to provision or otherwise service or support your account.

Smartsheet Cookie Notice

This notice explains how we may use cookies, pixels, and similar tracking technologies to gather information about your use of the Sites and Services - and your rights to control our use of them. This notice supplements Smartsheet's Privacy Notice; please visit www.smartsheet.com/legal/privacy for more complete information about our use of personal data.

What is a Cookie?

What are the Different Types of Cookies Used by Smartsheet?

How Does Smartsheet Use Cookies?

Your Choices

Other Tracking Technologies

Updating this Notice

How to Contact Us?

Cookies Used in Our Services

Cookies Used on the Sites

What is a Cookie?

A cookie is a small text file that is placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners to make websites work (or work more efficiently) and to provide reporting information. Cookies can be session cookies or persistent cookies. A session cookie expires automatically when you close your browser; a persistent cookie will remain on your device until it expires or you delete your cookies.

Persistent cookies can be used to make tasks like logging into services easier for returning users by remembering a user's login information. Expiration dates are set in the cookies themselves; some may expire after a few minutes while others may expire after a few years. Cookies set by the website owner (in this case, Smartsheet) are called 'first party cookies'. Cookies set by parties other than the website owner are called 'third party cookies'. Third party cookies enable third party features or functionality to be provided on or through a website (e.g., advertising, interactive content, and analytics). The company that sets third party cookies can recognize your computer both when it visits the company's website and when it visits certain other websites. For more information on cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org.

What are the Different Types of Cookies used by Smartsheet?

Essential Cookies. These are sometimes called ‘necessary,’ as without them we cannot provide many services that you need for the Sites and Services to function (e.g., essential cookies help remember your preferences as you move around the Services). Because these cookies are necessary to deliver the Sites and Services to you, you cannot refuse them. You can block or delete them by changing your browser settings, as described below under ‘Your Choices.’

Performance and Analytics Cookies. These cookies may be set on your device when you visit the Sites to track information about how the Services and Sites are being used so we can make improvements and report on our performance. These cookies may collect information such as how visitors use the Sites, the number of visits to the Sites or Services, and how long a user stays on the Sites or Services. We might also use performance cookies to test new pages or notify you about new features to see how users react to them. Statistics cookies on the Sites may either be first party cookies or third party cookies.

Functional Cookies. These are also sometimes called ‘preference’ cookies. During your visit to the Sites, cookies are used to enhance the performance of the Sites and to remember information you have entered or choices you have made (such as your language or region) but are non-essential to your use of the Sites.

Advertising Cookies. These third party cookies are placed by third party advertising platforms or networks on our Sites in order to deliver ads and track ad performance, and to enable advertising networks to deliver ads that may be relevant to you based upon your activities (sometimes called ‘behavioral,’ ‘tracking,’ or ‘targeted’ advertising). For more information, see ‘Behavior Targeting and Remarketing.’

How Does Smartsheet Use Cookies?

To make our Services and Sites as user-friendly as possible, we – like many other companies – use cookies to uniquely identify you, to help us process your transactions and requests, to track aggregate and statistical information about user activity, and to display advertising on third-party sites. Specifically, on the Sites, we use these technologies to manage content, analyze trends, monitor page visits and content downloads, administer the Sites, track users’ movements around the Sites, and to gather statistics about our user base as a whole. In the Services, we only use necessary cookies for authentication and session management. These technologies may provide us with personal data, information about devices and networks you utilize to access our Sites and Services, and other information regarding your interactions with our Sites and Services. We may combine the information we receive from cookies with personal data we have otherwise collected. For information about the specific cookies used on the Sites and the Services please see the applicable tables below.

Third-Party Analytics. We also use automated devices and applications, such as Google Analytics (more info [here](#)) and Optimizely (more info [here](#)) to evaluate the use of our Sites. We use these tools to gather non-personal information about users to help us improve our Sites and user experiences. These analytics providers may use cookies and other technologies to perform their services, and may combine the information they collect about you on our Sites with other information they have collected for their own purposes. This notice does not cover such uses of data by third parties.

Behavioral Targeting and Remarketing. We use advertising platforms, including but not limited to Google Ads/DoubleClick (more info [here](#)), Facebook Custom Audience (more info [here](#)), LinkedIn Marketing (more info [here](#)), Microsoft/Bing (more info [here](#)) and Marketo (more info [here](#)), to display ads as part of our advertising campaigns. As a result, our ads may be displayed to you on a search results page or on third party sites. Our advertising partners use cookies and other technologies such as web beacons to collect information about your activities on our Sites and other sites to provide you targeted advertising based upon your interests. The information collected through this process does not enable us or them to identify your name, contact details or other personally identifying details unless you choose to provide these. However, these third parties may collect your IP address or other device identifiers and combine the information they collect on our Sites with information about your visits to other sites to create market segments that they will use to more effectively advertise our services and those of other advertisers. Their tools may also limit the number of times you see the same advertisement and help measure the effectiveness of our advertising campaigns.

Your Choices

EU Residents. You have the right to decide whether to accept or reject cookies. You can exercise your cookie preferences [here](#).

Opting-Out. You can set or change your web browser controls to accept or refuse cookies. The “help,” “tools,” or “edit” portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you disable cookies, you may still access our Sites but be aware that some features of our Sites may not function. Most advertising networks offer you a way to opt out of targeted advertising. If you wish to not have this cross-site information used for the purpose of serving you targeted ads, you may opt-out of many ad networks by clicking [here](#) (or if located in the European Union, click [here](#)). Additional information is available at <http://www.aboutads.info/choices/> and <http://www.youronlinechoices.com>. Please note, we do not control any of the above opt-out links and are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms. You will continue to receive ads on the websites you visit, but the ad networks from which you have opted out will no longer target ads to you based upon your activities on other sites.

Do Not Track. Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Currently, our systems do not recognize browser "do-not-track" requests. In the meantime, you can use the "help" portion of the toolbar on most browsers to learn how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether as explained above.

Other Tracking Technologies.

Cookies are not the only way to recognise or track visitors to a website or an application. We and our third party service providers may use other, similar technologies from time to time, like web beacons (sometimes called 'tracking pixels' or 'clear gifs'), which are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, these web beacons are embedded invisibly on web pages and are not stored on your hard drive. We might use web beacons to track the activities of Site visitors, to help us manage content, for targeted marketing, and to compile statistics about usage. We and our third party service providers also might use clear GIFs in HTML emails to our customers to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their functioning.

Updating this Notice

This notice may be updated from time to time in order to reflect operational, legal, or regulatory changes. We will notify you of any changes by posting the new notice on the Site and adjusting the "Last Updated" date. If you are a Smartsheet customer and we make any material changes, we may notify you by email (sent to the email address specified in your account) or by means of a notice through the Services prior to the change becoming effective.

How to Contact Us?

Please visit www.smartsheet.com/legal/privacy-notices for details on how to contact our Privacy Office.

Cookies Used in Our Services

We use the following cookies in connection with your access to and use of our Services for the purposes of authentication and session management.

[IN-APP COOKIE TABLES LISTED HERE]

Cookies Used on the Sites

Smartsheet uses the cookies listed below on the Sites. We engage a third party to scan our Sites and automatically generate an up-to-date cookie table, as such this list may be updated from time to time. Smartsheet regularly

manually verifies this table (and updates it as needed). Where the purpose is “pending” below, this means that a description was not automatically available and the manual update has not yet occurred.

This table applies only to: www.smartsheet.com, de.smartsheet.com, es.smartsheet.com, fr.smartsheet.com, pt.smartsheet.com, it.smartsheet.com, ru.smartsheet.com, jp.smartsheet.com, community.smartsheet.com, help.smartsheet.com, and developers.smartsheet.com.

[SITES COOKIE TABLES LISTED HERE]

Smartsheet Candidate Privacy Notice

This notice applies with respect to personal data we collect from applicants for employment, internships, and independent contracting opportunities via our application forms, website, referrals, or other recruitment channels.

Personal Data We Collect

How We Use Personal Data

How We Share Personal Data

Who We Are

Your Choices

Your Rights

Personal Data Retention

How We Protect Personal Data

Children

International Transfers and Privacy Shield Notice

Changes to this Notice

How to Contact Us

English Version Controls

Personal Data We Collect

From You

- Identification and contact details. This includes information such as your name, address, email address, phone number and other contact information, as well as your gender, date of birth, nationality or nationalities, and national identifiers (for example, national ID, passport, or social security number).
- Employment history. This includes information about your previous employers and job titles.

- Background information. This includes information like your academic and professional qualifications, education, details included in your CV or résumé (some of which could include details about memberships or interests that reveal sensitive personal information about you), transcripts and employment references.
- Reference information. This includes information about your professional references that you share with us (including their name, contact information and job title, though it is your responsibility to get your references' consent to share their personal information with us), as well as information we receive from background checks (when we have them completed for a role), and information provided by other third parties.
- Previous applications and roles with us. This includes information about any prior applications you may have made for a position with us or any previous employment history with us.
- Your immigration or visa status. This includes information that would let us know if you are authorized or able to become authorized to work for one of our group companies.
- Other information you voluntarily provide. This includes information that you may provide throughout the recruitment process, including, for example, through assessment exercises and interviews.

Unless permitted or required by law, there are certain types of information that we generally try to avoid collecting. For example, information that reveals race or ethnicity, religious, political or philosophical beliefs or trade union membership; genetic or biometric data; or information concerning your health/sex life ("Sensitive Personal Data"). We may collect some Sensitive Personal Data from you for legitimate recruitment and employment-related purposes, including meeting compliance obligations; providing accommodations for disabilities; equal opportunity monitoring; for anti-discrimination purposes; and to satisfy reporting obligations. Separately, you may choose to disclose, voluntarily, Sensitive Personal Data during the recruitment process. If required by law, we will request your consent if we collect Sensitive Personal Data.

From Third Parties

We may gather Personal Data about you from third parties, including:

- Professional references
- Background info provided or confirmed by academic institutions and training or certification providers
- Background checking agencies and other external database holders
- Recruitment or executive search agencies

- Publicly available sources, including social media such as LinkedIn or other information available online (as part of this, we may contact any mutual connections that are evident from publicly available information)

Automatically

We automatically gather personal data from our Site's "Careers" page. The Careers page is available for you to visit and search for open positions. For more details about the personal data we collect through our Sites, please see our Cookie Notice.

How We Use Personal Data

We rely on these legal bases for the processing of personal data we collect under this notice. Where we rely on a legitimate business interest to process such information, we use the personal information in furtherance of legitimate business interests that include:

Registering Office Visitors: To register visitors to our offices and to manage non-disclosure agreements that visitors may be required to sign, to protect Smartsheet's offices and confidential information against unauthorized access.

Protect Legal Rights and Prevent or Address Misconduct. To protect Smartsheet employees and other individuals; prevent unauthorized access to Smartsheet; and where we believe necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the safety of any person.

Comply with Legal Obligations. To comply with the law or legal proceedings; for example, we may disclose information in response to lawful requests by public authorities, including responding to national security or law enforcement disclosure requirements.

General Business Operations. Where necessary to the administration of our general business, accounting, recordkeeping, employment, and legal functions.

Special Note Regarding European Union Applicants. For the personal data from the European Union that we process, the relevant legal bases for such processing under the General Data Protection Regulation ((EU) 2016/679) (and local implementing laws of EU member states) include: (i) our legitimate business interests*; (ii) with your consent; (iii) compliance with law; and (iv) to establish, defend, or protect our legal interests. These bases do not limit or modify the obligations, rights, and requirements under the privacy laws of non-EU jurisdictions.

*For the personal data from the EU, the processing is in our legitimate interests, which are not overridden by your interests and fundamental rights. Marketing to EU data subjects is done only with opt-in consent.

How We Share Personal Data

To Our Service Providers. We use third party service providers to process your personal data to assist us in business and technical operations. Smartsheet has data processing agreements with such service providers limiting their use of and access to personal data to specific purposes. They provide services relating, but not limited to performing services on our behalf and only in accordance with our instructions, or to comply with legal requirements.

To Affiliates. We may share your personal data with our affiliates for employment opportunities and positions.

As Required by Law. We release information about you if we believe we must do so to comply with the law or a subpoena, bankruptcy proceeding, or similar legal process. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

To Protect Rights. We may disclose information about you, such as your name and contact information, to enforce our agreements with you or to protect the rights and safety of Smartsheet, our customers and users, and the general public, or as evidence in litigation in which we are involved.

In a Business Transaction. If Smartsheet is involved in a merger, acquisition, or sale of all or a portion of its assets, your information may be transferred to the acquiring entity as part of the transaction (provided that we inform the buyer it must use your personal data only for the purposes disclosed in this notice), and may also be reviewed as part of the due diligence review for the transaction (e.g., we may need to provide a list of all customer accounts and payment histories).