

Gunderson Dettmer Client Questionnaire Data Mapping for Privacy Policy

This questionnaire is designed to help us efficiently prepare your company's privacy policy. Please save a local copy of this PDF, complete the fields below and email the completed form to your Gunderson Dettmer attorney.

Please keep these important notes in mind as you respond to the following questions:

- Our goal is to make your privacy policy accurate while avoiding the need for frequent updates. Accordingly, in addition to your current practices, your answers should reflect what you plan to do in the foreseeable future.
- Your answers should reflect personal data you collect and "control" and not personal data you collect and process solely as a service provider for other companies. If your business is B2B, you should answer these questions with regard only to personal data that you collect and use for your own purposes, and not data that your B2B customers share on your platform, if you exercise no control over that data. If your business is both B2B and B2C, you should connect with your Gunderson Dettmer attorney to ensure the correct scope of information is being provided.

Select the channels through which you collect personal data:
 □ Website □ Mobile app □ Desktop app □ Internet-of-things device or other hardware □ Sites or services run by third parties, through embedded cookies, pixels or other tracking technologies □ Other:

☐ Please check here if you receive personal data <u>about any third parties</u> from your customers or users (including if you collect this information on your customers' or users' behalf).
For example, if your company is an HR SaaS platform and you gather personal data about your customer's employees for that customer. Or if your company is a media editing platform, and your users can process photos/videos of other people in connection with their use of your services.

LEGAL DISCLAIMER: Gunderson Dettmer Stough Villeneuve Franklin & Hachigian, LLP provides these materials for information purposes only and not as legal advice. This questionnaire is designed to help your Gunderson Dettmer attorney prepare your Company's privacy policy. The questions may need to be customized for your Company and may not cover all information required to be disclosed in your privacy policy. Applicable laws continue to evolve and this questionnaire may need to be accordingly updated. The provision of this questionnaire does not create any attorney-client or other relationship between you and Gunderson Dettmer Stough Villeneuve Franklin & Hachigian LLP. Contact your Gunderson Dettmer attorney if you are a current client and have questions.



Collection of Personal Data

Please fill out the chart in this section to help us understand the personal data you collect and share. The descriptions that follow explain the categories of third parties listed in the chart's third column.

- **Service Providers**: Companies that process personal data from you in the course of providing you with services (e.g. hosting providers, ISPs, HR/payroll platforms, payments processors).
- Advertising Partners: Companies in the marketing or advertising space, including those that help serve targeted ads (e.g. ad networks, data brokers that help with ads/marketing).
- **Analytics Partners**: Companies that provide analytics on web traffic or usage of the site (e.g. tools that track user clicks or how visitors found your site).
- **Business Partners**: Companies with whom you partner to offer goods or services to your users (e.g. joint products or promotions).
- Parties Users Authorize, Access, or Authenticate: Sites users knowingly access on or through
 your services or parties with whom a user directly shares information (e.g. social networks,
 sometimes through share buttons; third party accounts that users can connect to their account
 on your services).

Category of Personal Data	Examples of Personal Data	Categories of Third Parties With Whom You Share the Personal Data
Instructions: please check all categories of data that you collect. If you do not collect any data in a given category, leave that box unchecked.	Instructions: please check the pieces of data you collect. Leave types of data that you don't collect unchecked. If you collect data that is not listed, please include it in the "Other" space.	Instructions: please check all categories of third parties with whom you share each category of data.
☐ Profile or Contact Data	☐ First and last name ☐ Email address ☐ Phone number ☐ Mailing address ☐ Other: (if users create accounts, list all information collected in connection with account registration)	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:



Category of Personal Data	Examples of Personal Data	Categories of Third Parties With Whom You Share the Personal Data
☐ Identifiers	 □ Social security number □ Driver's license number □ Passport number □ Cultural or social identifiers (for example, being a skateboarder, a Green Bay Packers fan or an environmental activist) □ Other: 	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:
☐ Payment Data	 □ Payment card type □ Credit or debit card number (full number) □ Credit or debit card number (last 4 digits only) □ Bank account information □ Billing address □ Billing phone number □ Billing email □ Other: 	□ Payment Processor Only OR □ Service Providers □ Advertising Partners □ Analytics Partners □ Business Partners □ Parties Users Authorize, Access or Authenticate □ Other:
☐ Commercial Data	□ Purchase history (of products or services, either purchased, obtained, or considered) □ Consumer profiles (collections of data to summarize or predict consumer interests or purchasing habits) □ Records of personal property □ Other:	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:



Category of Personal Data	Examples of Personal Data	Categories of Third Parties With Whom You Share the Personal Data
□ Online Identifiers	☐ Unique identifiers such as account name and passwords ☐ Other unique personal or online identifiers ☐ Other:	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:
□ Device/IP Data	☐ IP address ☐ Device ID ☐ Domain server ☐ Type of device/operating system/browser used to access the Services ☐ Other:	 □ Service Providers □ Advertising Partners □ Analytics Partners □ Business Partners □ Parties Users Authorize, Access or Authenticate □ Other:
☐ Web Analytics	□ Browsing or search history □ Web page interactions (including with ads) □ Referring webpage/source through which users accessed the Services □ Non-identifiable request IDs □ Statistics associated with the interaction between device or browser and the Services □ Other:	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:



Category of Personal Data	Examples of Personal Data	Categories of Third Parties With Whom You Share the Personal Data
□ Social Network Data	 □ Email □ Phone number □ User name on the social network □ IP address □ Device ID □ Info from user's social media profile specify: □ Other: 	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:
☐ Demographic Data	☐ Age / date of birth ☐ Zip code ☐ Gender ☐ Race ☐ Ethnicity ☐ Sexual orientation ☐ Political opinions ☐ Religious beliefs ☐ Union membership ☐ Other:	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:
☐ Professional or Employment-Related Data	☐ Resume ☐ Job title ☐ Job history ☐ Performance evaluations ☐ Other:	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:



Category of Personal Data	Examples of Personal Data	Categories of Third Parties With Whom You Share the Personal Data
☐ Non-Public Education Data	☐ Grades or transcripts ☐ Student financial information ☐ Student disciplinary records ☐ Other:	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:
☐ Geolocation Data	☐ IP address-based location information ☐ Specific location data (i.e. GPS) ☐ Other:	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:
☐ Biometric Data	☐ Fingerprints ☐ Scan of face or hand geometry (including faceprints) ☐ Voiceprints ☐ Retina or iris scans ☐ Genetic data ☐ Other:	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:



Category of Personal Data	Examples of Personal Data	Categories of Third Parties With Whom You Share the Personal Data
☐ Sensory Data	☐ Photos, videos or recordings of a user's environment ☐ Other:	 □ Service Providers □ Advertising Partners □ Analytics Partners □ Business Partners □ Parties Users Authorize, Access or Authenticate □ Other:
☐ Health Data	 ☐ Medical conditions ☐ Weight ☐ Health or exercise activity monitoring ☐ Mental health information ☐ Medical insurance information ☐ Other: 	 □ Service Providers □ Advertising Partners □ Analytics Partners □ Business Partners □ Parties Users Authorize, Access or Authenticate □ Other:
☐ Inferences Drawn from Other Personal Data Collected	☐ Profiles reflecting user attributes, behavior, preferences or abilities/aptitudes ☐ Other:	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:



Category of Personal Data	Examples of Personal Data	Categories of Third Parties With Whom You Share the Personal Data
☐ Other Identifying Information that You Voluntarily Choose to Provide	☐ Identifying information in emails or letters from users ☐ Other:	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:
□ Other:	□ Other:	☐ Service Providers ☐ Advertising Partners ☐ Analytics Partners ☐ Business Partners ☐ Parties Users Authorize, Access or Authenticate ☐ Other:



Sources of Personal Data

Please indicate the sources of the personal data that you collect:

•	Directly from the user:
	 □ Information the user provides □ Cookies, analytics or tracking tools placed on your website □ Cookies, analytics or tracking tools placed on third party sites □ Other:
•	From public records:
	☐ Records from the government, public social media posts, etc.☐ Other:
•	From third parties:
	 □ Vendors – analytics providers □ Vendors – lead generation or creating user profiles □ Advertising partners (ad networks) □ Data brokers □ Social media networks (for example, if users can log into your service with or connect their Facebook/Google/Twitter accounts) □ Other:
•	Other:
	□ Other:



Uses of Personal Data

This section contains our standard disclosure about how you use the personal data that you collect. Please let us know if any of these are not applicable (by unchecking) or applicable (by checking), or if you use personal data in any other way:

Providing, Customizing and Improving the Services:

Providing users with the products, services or information they request.

Meeting or fulfilling the reason users provided the information to the Company.

Providing support and assistance for the Services.

Improving the Services, including testing, research, internal analytics and product development.

Personalizing the Services, website content and communications based on users' preferences.

Doing fraud protection, security and debugging.

Carrying out other business purposes stated when collecting users' Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act.

Creating and managing user accounts or other user profiles. (if applicable)

Processing orders or other transactions; billing. (if applicable)

Other:

• Marketing the Services:

Marketing and selling the Services.

Showing users advertisements, including interest-based or online behavioral advertising. (if applicable)

Other:

Corresponding with You:

Responding to correspondence from users, contacting users when necessary or requested, and sending users information about the Company or the Services.

Sending emails and other communications according to user preferences or that display content that you think will interest users.

Other:



Meeting Legal Requirements and Enforcing Legal Terms:

Fulfilling the Company's legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.

 $\label{protecting} \mbox{ Protecting the rights, property or safety of users, the Company or another party.}$

Enforcing any agreements with users.

Responding to claims that any posting or other content violates third-party rights.

Resolving disputes.

Other:



Sharing of Personal Data

Tell us how you share the personal data you collect:

•	With Service Providers:
	 ☐ Hosting, technology and communication providers ☐ Security and fraud prevention consultants ☐ Analytics providers ☐ Support and customer service vendors ☐ Product fulfillment and delivery providers ☐ Payment processors: ☐ Stripe ☐ Square ☐ Braintree ☐ Other:
	□ Other:
•	With Advertising Partners:
	 □ Ad networks □ Data brokers □ Marketing providers □ Other:
•	With Business Partners:
	☐ Businesses that your users have a relationship with Please explain:
	 □ Companies that you partner with to offer joint promotional offers or opportunities □ Other:



•	With Parties that Users Authorize, Access or Authenticate:					
	 □ Third parties that users access through the services □ Social media services □ Other users □ Other: 					
•	Other:					
	□ Other:					



Sales of Personal Data

The CCPA distinguishes between two types of data sharing with third parties. Information can be disclosed for a "business purpose" or "sold."

- **Disclosures for a business purpose** limit how a third party can use personal data you share with them. Generally, they can only use the data for the purpose of providing services to you and not for their own purposes.
- Sales of personal data are when you receive money, or anything else of value, in exchange for the personal data you're sharing. This may include sharing your users' personal data with an analytics or advertising partner, depending on the partner's rights with respect to that data.

The distinction between disclosing personal data for a business purpose and selling personal data may be difficult to determine. Please contact your Gunderson Dettmer attorney to help you further understand your obligations when you are "selling" personal data.

Given the distinction above, please let us know if you think you are selling personal data to these or any other third parties:

We	don't sell personal data.
We	sell personal data to the following third parties:
	Ad Networks
	Data brokers
	Marketing providers
	Customers
	If so, please list and explain:
	Business Partners If so, please list and explain:
	Other:



Additional Questions Do users have the option to create an account? ☐ No ☐ Yes Are the services free, or are you selling anything ☐ Free (either products/goods, or services that users pay ☐ Paid for)? Will children (aged 16 and younger) be allowed to □ No use your services? ☐ Yes Note: there are various laws that regulate how companies collect and process data from children. These requirements are quite onerous, so unless your product/service is explicitly aimed at children, we recommend excluding children as customers/users. If your product/service is aimed at children, let us know and we can discuss. Do you collect personal data from users in Europe? □ No ☐ Yes – we collect and control this data ☐ Yes – but only as a service provider to our customers If yes, please explain what services you offer to people in the EU, and estimate what percent of your user base or sales are in the EU: If yes, please describe the ways in which you market or plan to market to the EU and/or whether you ship goods or make services available in the EU (e.g. apps available for download): If yes, please indicate whether you have an entity, offices or personnel in the EU: If yes, please indicate whether you track online □ No behavior of individuals in the EU: ☐ Yes ☐ Privacy Shield certification If yes, tell us which transfer mechanism you are using to transfer personal data out of the ☐ Model clauses EU: If Privacy Shield certified, tell us who ☐ Better Business Bureau you are using for dispute resolution: ☐ JAMS ☐ Other:



Do you do business in California and collect personal data from users there? On January 1, 2020, the California Consumer Privacy Act (CCPA) went into effect. This law contains a number of obligations for companies that are subject to it. Generally speaking, you are subject if you do business in CA and meet one of these three criteria: 1) annual gross revenue of over \$25,000,000; 2) handle data of more than 50,000 CA-based people or devices; or 3) 50% of your business revenue comes from selling personal data. — If yes, do you offer users any kind of incentive or compensation for the use of their data? Under the CCPA, you are not allowed to discriminate against users who request that you do not sell their personal data). Notwithstanding that, you are, under certain narrow circumstances, allowed to offer users some kind of incentive or compensation for the use of their personal data. If you are offering users any different levels of service or prices based on how you use their data, select "Yes" and we can work with you to draft an appropriate disclosure. — If so, please briefly explain.	☐ No ☐ Yes If yes, do you (or will you in the foreseeable future) meet any of the 3 listed criteria? ☐ No ☐ Yes ☐ No ☐ Yes
 If yes, do you have the information of 10,000,000 or more CA-based people or devices? 	□ No □ Yes
Is selling or sharing personal data a significant part of your business model?	□ No □ Yes



Third Party Cookies

Please tell us which types of cookies you use in connection with your services (including your website and any mobile apps):

Cookie Type / Use					
☐ Essential	☐ Functional	☐ Analytics /	☐ Ad Analytics	☐ Ad Tracking	
These are necessary for your site / services to work.	These help record user choices / preferences over time.	Performance These are for user tracking / analytics.	These help you track the performance of ads, if an ad was viewed, etc.	These help you serve interest-based ads.	

NOTE: Depending on the nature, location and risk profile of your business, you may need to do a more detailed analysis of your third party cookie usage. Your Gunderson Dettmer attorney can help you evaluate if completing the following chart is necessary at this stage.

Cookie Developer	Third Party Cookie Type / Use					
	Essential	Functional	Analytics / Performance	Ad Analytics	Ad Tracking	
Adobe (Omniture)						
Amazon						
AppNexus						
Braintree						
Chartbeat						
Crowdsignal						
Datadog						
Facebook						
Flurry						
Google (Adsense; Doubleclick)						
Google (Analytics; Firebase)						
Impact Radius						
Integral Ad Science						
LinkedIn						
Marketo						
Microsoft (Bing)						
MOAT						
Oath						
OpenX						
PubMatic						



Cookie Developer	Third Party Cookie Type / Use					
	Essential	Functional	Analytics / Performance	Ad Analytics	Ad Tracking	
Rocket Fuel						
Salesforce						
Segment						
Square						
Stripe						
Twitter						
Yahoo						
Other:						
Other:						
Other:						
Other:						
Other:						
Other:						
Other:						
Other:						