

## TENABLE AND THE CCPA

Tenable (“we”, “us”, the “**Company**” or “**Tenable**”) is committed to protecting the privacy and security of your personal information. This Notice describes how we collect, use, disclose, or otherwise process your personal information during and after your working relationship with us, in accordance with the California Consumer Privacy Act (“**CCPA**”) as amended by the California Privacy Rights Act (“**CPRA**”).

This Notice applies to you if you (1) are a resident of the State of California, and (2) are an employee, intern, consultant, individual contractor, or director of the Company. It also applies to third parties whose information you provide to us (e.g., emergency contacts, and named beneficiaries) that reside in the State of California. Please ensure that you provide a copy of this Notice to any third parties whose personal information you provide to us.

Where we refer to “employee personal information” or “employment” in this Notice we do so for convenience only and this should in no way be interpreted as purporting to confer employment status on non-employees to whom this Notice also applies. This Notice does not form part of any contract of employment and does not confer any contractual rights on you or place any contractual obligation on us.

Tenable is responsible for deciding how we hold and use personal information about you. When we process your personal information, we will always apply the core principles of the CCPA to ensure it is:

1. Used lawfully and in a transparent way.
2. Collected only for purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Kept only as long as necessary for the purposes we have told you about.
5. Kept securely.

**If you have any questions about this Notice or about how we handle your personal information, please email [privacy@tenable.com](mailto:privacy@tenable.com).**

## What is personal information?

Your personal information is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with you.

We may collect the following categories of personal information about you:

- **Identifying information**, such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, employee number, Tenable security and system access information (e.g., login and password information, key card number and usage), tax ID number, or other similar identifiers.
- **Financial, medical, or health insurance information**, such as financial account details, tax information, withholdings, salary, benefits, and expenses.
- **Demographic information, including information about protected characteristics**, such as gender or gender

identity, marital status, race, national origin, military service, and disability status.

- **Internet or other electronic network activity information**, such as browsing history, search history, and information regarding your interaction with our website or intranet site; information, including technical information, contained on or collected through a Company-owned device or network; and information captured on security systems, which may include Closed Circuit Television (“CCTV”) and key card entry systems.
- **Professional or employment-related information**, such as work location, job/position title, assignments, supervisor and reporting information, employment contract information, compensation data, promotion information, benefits information, expenses information (e.g., receipts, travel details), information regarding previous work experience, professional skills, professional memberships, community involvement, qualifications and work history, training details, and assessment and performance-related information.
- **Education information**, such as schools attended and degrees conferred.
- **Audio recordings, visual, electronic, or other similar information**, such as photos or audio or video recordings captured during your employment.
- **Geolocation information**, for example, if you use Tenable-issued computers or mobile devices with data loss prevention tracking features enabled.
- **Inferences drawn from any of the information listed above.**

We may collect certain data that qualifies as sensitive personal information, such as:

- Social Security number, driver’s license, state identification card, or passport number;
- Personal information that reveals racial or ethnic origin, religious beliefs, or sexual orientation; and
- Personal information collected and analyzed concerning health (e.g., related to the provision of health benefits or accommodations or office safety protocols, such as vaccination status, health questionnaires, or other similar health information).

Other than directly from you, we may collect your personal information from the following categories of external sources:

- Background check and employee screening agencies;
- Former employers, references and/or coworkers;
- Educational institutions;
- Tenable employees with whom you work, such as your supervisor(s);
- Recruiting and staffing partners or other jobs websites;
- Professional licensing and certification bodies; or
- Benefits providers.

We will use your personal information for the following purposes:

- To administer our working relationship with you; and
- To enable us to comply with legal obligations.

## How and for what purposes does Tenable process your personal information?<sup>1</sup>

The following are the purposes for which we may process your personal information. For each purpose, we also list the types of data we may process to fulfill such purposes.

<p><b>Recruitment &amp; Selection</b></p> <ul style="list-style-type: none"> <li>- Making a decision about your recruitment</li> <li>- Determining the terms of an offer of employment</li> <li>- Checking that you are legally entitled to work in the United States</li> </ul>	
Types of personal information	Identifiers including personal contact details (telephone, email, address), name, gender, professional or employment-related information, such as prior employment history (name of employer, tenure, job title), education information and training history (institutions, qualifications, grades, courses attended and references). Occasionally depending on the position, additional information may be required as part of pre-employment checks (criminal records etc.).

<p><b>Monitoring</b></p> <ul style="list-style-type: none"> <li>- To monitor your use of information and communication systems to ensure compliance with our IT, confidentiality and harassment policies (to the extent permitted by law)</li> <li>- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution</li> <li>- To track entry and exit of buildings/car parks to ensure the physical security of our office sites (to the extent permitted by law)</li> </ul>	
Types of personal information processed	Audio, electronic or visual, or similar information, such as CCTV footage and other information obtained through electronic means such as swipe card records, information about your use of our information and communications systems (to the extent permitted by law).

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<sup>1</sup> Tenable does not process personal information in a discriminatory manner. Tenable is an equal employment opportunity employer and does not tolerate discrimination or harassment on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, genetic information, or any other characteristic protected by law.

<p><b>Staff Administration</b></p> <ul style="list-style-type: none"> <li>- Business management and planning</li> <li>- Establishing and maintaining benefits policies and plans</li> <li>- Determining promotions, compensation, transfers, terminations, etc.</li> <li>- Dealing with legal disputes and regulator enquiries</li> <li>- Preventing fraud</li> <li>- Executing grievance and disciplinary processes</li> <li>- Complying with health and safety obligations</li> <li>- Absence management (sick leave, family leave, etc.)</li> <li>- Time management</li> <li>- Coordinating travel</li> <li>- Coordinating building/car park access</li> </ul>	
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Types of personal information processed	Identifiers including personal contact details (telephone, email, address), name, gender, next of kin and emergency contact information, date of birth, marital status and dependents, social security number/tax ID number, bank account details, copies of relevant identification documents (passport, drivers license, etc.), employment information including details of qualifications, performance ratings, copies of employment contracts and supporting documents, ongoing records of training and vocational development, location of employment, start date of employment, current and historic job titles, working hours, professional memberships, remuneration details and history, disciplinary and grievance information, individual requirements under health and safety regulations, health information relevant to sickness absence, travel information, timesheet information, car registration number, trade union details, collective agreement affiliations, details of termination.
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<p><b>Payroll</b></p> <ul style="list-style-type: none"> <li>- Paying you</li> <li>- Withholding and remitting tax and social security</li> <li>- Filing reports with the tax and social security authorities</li> <li>- Coordinating monetary benefits (allowances, vouchers etc.)</li> <li>- Tracking working time and annual leave</li> </ul>	
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Types of personal information processed	Current and historic remuneration data, payslips, identifiers such as social security number/tax ID number, tax status and relevant notices received from regulators, annual leave, sickness absence and working time information, bank account details
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<p><b>Performance Management</b></p> <ul style="list-style-type: none"> <li>- Conducting performance reviews</li> <li>- Managing performance and work-related training</li> <li>- Making decisions about salary and compensation</li> <li>- Making decisions about promotions, demotions, or termination</li> </ul>	
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Types of personal information processed	Emails, appraisals, meeting notes, expressions of opinion or future intentions, audio/visual recordings or other similar information.
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<b>Equality</b> <ul style="list-style-type: none"> <li>- Equal opportunities monitoring and reporting</li> <li>- Managing discrimination and harassment claims</li> </ul>	
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Types of personal information processed	Information about your race, gender, nationality, ethnicity, religious beliefs, or sexual orientation
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We collect and process your sensitive personal information where necessary and in compliance with applicable local data protection laws. In particular, Tenable processes sensitive personal information:

- To carry out its obligations as an employer (e.g., verifying your identity and eligibility to work, administering benefits);
- To comply with legal obligations (e.g., equal opportunity reporting obligations); and
- Where necessary, for the establishment or defense of legal claims.

Tenable does not use sensitive personal information for any other purposes, including to infer characteristics about you.

**If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to administer our working relationship with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

**Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and seek your specific, informed consent to use your personal data for such purpose.

**Does Tenable disclose your personal information to third parties?**

We may disclose your data to third parties, including third-party service providers and Tenable affiliates when required by law or when it is necessary to administer the working relationship with you. Any of the categories of personal information that we collect may be disclosed to third parties to further the purposes and activities described in this section.

The following activities are performed by third-party service providers:

- Payroll and equity management;
- Benefits provision and administration;
- Tax compliance and accounting;
- HR consulting;
- Legal services; and
- IT services

We will disclose your personal information to Tenable affiliates as part of our standard reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support, and the hosting of data.

We may also disclose your personal information to other third parties in the context of the possible sale or restructuring of the business, or with a government authority if required by law.

We require all of our third-party service providers and Tenable affiliates to take appropriate security measures to protect your personal information in accordance with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only permit them to process your personal information for specified purposes, in accordance with our instructions as identified under our agreement with them.

In the preceding twelve (12) months, Tenable has not sold personal information, including the personal information of individuals under sixteen years (16) of age, or shared such personal information for the purposes of targeted advertising.

## **How long does Tenable store your personal information?**

We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, unless a longer period is necessary for our legal, accounting, or reporting requirements, or for the exercise or defense of legal claims. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, we may anonymize your personal information so that it can no longer be associated with you, in which case, it is no longer considered personal information and we may use such data without further notice to you. Once you are no longer employed or engaged by Tenable, we will retain and securely destroy your personal information in accordance with our policies, practices and/or applicable laws and regulations.

## **What security measures does Tenable use to protect your personal information?**

We have implemented appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, as outlined in this Notice and they are subject to a duty of confidentiality.

We have also implemented procedures to respond to any data security breach. We will notify you and any applicable government agency of a data security breach when we are legally required to do so.

## What rights do you have under the CCPA?

California residents may have the following rights relating to their personal information:

- **Right to access** – You may have the right to request a copy of the specific pieces of personal information that Tenable collects about you.
- **Right to know** – You may have the right to know what personal information we have collected about you, including, as applicable, the categories of personal information we have collected, the sources from which we collected that personal information, the business or commercial purposes for which we collected and disclosed that personal information, the categories of personal information that we disclosed to third parties for business purposes, and the categories of third parties to whom we disclosed personal information.
- **Right to delete** – You may have the right to request that Tenable delete the personal information we have collected from you.
- **Right to correct personal information** – You may have the right to update inaccurate information that we process about you.

Your rights are subject to certain exceptions under the CCPA, for example, even if you request that we delete your personal information, we may be required to retain it to comply with a legal obligation.

To exercise rights in relation to your personal information, you can email us at [privacy@tenable.com](mailto:privacy@tenable.com) using “CCPA Request” in the subject line.

Your request must (1) provide sufficient information to allow us to verify that you are the person about whom we have collected personal information, and (2) describe your request in sufficient detail to allow us to understand, evaluate, and respond to it. We may not respond to requests that do not meet these criteria. We will only use personal information provided in your request to verify your identity and complete your request.

You may also authorize an agent (“**Authorized Agent**”) to exercise your CCPA rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

### Non-Discrimination

We will not discriminate or retaliate against an employee, job applicant or independent contractor because for exercising any of the rights described.

\* General information about Tenable’s privacy practices is available at <http://www.tenable.com/privacy>.