JetBrains Privacy Notice

Version 3.0, last updated: 3 July, 2024

In this Privacy Notice, we describe the types of data, including Personal Data, (collectively, "data") that we and our associated companies collect from you when you use JetBrains Websites and certain JetBrains products and services as described in this Privacy Notice (collectively, our "services"), how we and our associated companies use and disclose that data, and your options for accessing or updating your data.

For information about your privacy choices, please see Section 10, Your Privacy Choices and Rights, and Section 14, Privacy Notice Specifications for Certain U.S. Jurisdictions.

If you are a resident of California, please also refer to Section 13, Privacy Notice Specifications for California Residents, for information about the categories of personal information we collect and your rights under California privacy laws.

The data controllers are JetBrains s.r.o., Praha 4, Na Hřebenech II 1718/8, PSČ 140 00, Czech Republic, and the associated companies of JetBrains (collectively "JetBrains," "we," or "us").

JetBrains and its associated companies act as joint data controllers, who are jointly responsible for compliance with data protection legislation. JetBrains s.r.o. is primarily responsible for exercising the rights of data subjects and providing information about data processing.

This Privacy Notice identifies what Personal Data we may process about you. The extent varies depending on whether you are just visiting our Website or using our products or services. We do not process health data or otherwise sensitive data about you. For more information, you can contact us anytime at privacy@jetbrains.com . This document applies only to situations where we act as a Personal Data controller. More information about circumstances in which we are in the role of data processor can be found in our Data Processing Agreement . The list of our partners who might process your Personal Data, including the location of the data, can be found here .

1. Definitions

The following definitions are used throughout this Privacy Notice:

COPPA. Children's Online Privacy Protection Act. in the US.

GDPR. General Data Protection Regulation (EU) 2016/679 as amended.

JetBrains Software Product. Any software product distributed or made available by JetBrains under the JetBrains Subscription Agreement or any other JetBrains Agreement, **excluding** third-party software. Any such third-party software is governed by its own terms and conditions and Privacy Notice.

JetBrains Software as a Service. Any JetBrains Software Product that is offered as a hosted solution, where the software is installed and maintained by JetBrains and provided to you as a service.

JetBrains Website. Any website that is the property of JetBrains, including, but not limited to, everything hosted under the domains listed at https://www.jetbrains.com/legal/websites.

JetBrains Account. An account you create and which JetBrains may use in communicating with you or providing JetBrains Products to you. It contains your first name, last name, email address, username, and, if uploaded voluntarily, your photograph or another avatar. Your JetBrains Account is accessed via a username and password or a similar authentication method and can be used to manage your Personal Data.

JetBrains Terms of Use. The JetBrains Subscription Agreement, the JetBrains Terms of Use for a product or a service, the JetBrains License Agreement, or other agreements you have in place with JetBrains covering JetBrains Products or services.

Personal Data. Any data relating to an identified or identifiable natural person.

All other terms used in this Privacy Notice (such as controller, processor, data subject, and others) that are defined in Article 4 of the GDPR shall have the same meaning as defined in Article 4 of the GDPR.

JetBrains Software Products, the JetBrains Website, JetBrains Accounts, and JetBrains Software as a Service may be collectively referred to as "**JetBrains Products**" or "**products and services**."

2. Why We Collect Data and What We Collect

We collect data for various reasons, such as:

a) **To provide you with software, services, or information**. We may collect data, including your Personal Data, that is required to provide you with software, support, and services, license validation and checking for updates, providing support, reporting issues and bugs, and other processing connected with the use of JetBrains Products or information. We may use collected data to develop and test products and services. You may explicitly provide the Personal Data required for you to receive the software, support, or services, whether you purchase or use JetBrains Products, use our support forums, sign up for a JetBrains Account, register for a webinar, participate in a survey, and/or subscribe to receive marketing and/or technical information and content. This data may also be collected in the course of your using JetBrains Products. We may use third-party service providers, acting as data processors, to assist us in providing JetBrains Products to you or in our operations. For example, we may use third-party service providers to provide data storage and backup services. The legal basis for this data processing is the performance of a contract between you and us. With your consent, your Personal Data may also be transferred to third-party service providers, acting as separate data controllers, who provide products and services complementary to JetBrains Products (further data processing performed by these service providers is governed by their privacy policies). The legal basis for this data processing is consent.

b) **To protect us from piracy and the unlawful use of our software or services**. We may collect data that is necessary to protect us from piracy or the unlawful or unauthorized use of our software or services, or that is necessary to ensure the security of our software or services, including both Personal Data provided by you (see above) and data collected in the course of your use of JetBrains Products. The legal basis for this data processing is JetBrains' legitimate interest in protection from piracy and from the unlawful use of JetBrains software and services. Such personal data may include your IP address and information about your JetBrains Account. Collecting this data may include asking for your school records to prove that you are indeed a student if you are applying for a student license.

c) **To improve our offerings based on usage**. With your consent, we may collect anonymous data based on your use of JetBrains Products. We use this data to better understand the usage patterns of our products and the behaviors of our collective audience. At times, we may share this information in an aggregated anonymous form with third parties. Since the data is anonymous, no personal data is processed. Please refer to our Cookie Notice for more information regarding the collection of non-anonymous data (cookies) when you are using the JetBrains Website.

d) **For JetBrains' internal evidence and to protect the rights and interests of JetBrains and other users**. We may collect data that is required as evidence of the provision of software and services to you, of any communication between you and us, of your contact details, of your use of our software and services, of your compliance with the terms of the agreement between you and JetBrains, of any payments or refunds, and of any issues or disputes between you and us. We may use and disclose this data where we believe, in our sole judgment, that it is legitimate and appropriate to do so to protect our rights and interests and the rights and interests of other users of JetBrains Products or services, or where we believe there has been a violation of this Privacy Notice that could affect the interests of JetBrains or its customers for a period corresponding to the statute of limitations. The legal basis for this data processing is our legitimate interest in keeping internal evidence and protecting the rights and interests of us and other users.

e) **To promote and market our products and services**. We may use feedback that you voluntarily provide about our products or services. As permitted by applicable law, we may use such feedback in the form of anonymized quotes or in other ways in accordance with the JetBrains Terms of Use. We also may use data that we collect and aggregate to assist us in determining the appropriate marketing and advertising for our products and services. In doing so, we may share anonymous aggregated data with third parties to assist us with these efforts. With your consent or if permitted by applicable law on the legal basis of legitimate interest, we may also use your contact details to send you commercial communications about our products and services. This may include reaching out to you if you used a trial or EAP version of a JetBrains Product, if you started a purchase process on the JetBrains Website but did not complete it, if you have used JetBrains Products in the past, or in similar scenarios. We may also use third-party service providers to assist us with our email marketing. In that case, the third-party service provider will

have access to your email address, your name, and other information necessary to engage in the marketing. Such third-party service providers will act as data processors and will not use your Personal Data for their own purposes. As more fully described in the **How We Collect Data** section, we also may use third-party service providers to assist us with our digital advertising, including through cross-contextual advertising on third-party properties. In that case, the third-party service provider will have access to your online identifiers and information about your use of our products and services. The legal basis for this data processing is our legitimate interest in promoting and marketing our products and services, or your explicit consent. During conferences or events, we may use badge scanning services, also called lead retrieval or scanning, where we can scan your badge and collect certain Personal Data to enable us to contact you for the above-mentioned purposes.

f) **To fulfill legal duties stipulated by accounting, taxation, and other laws**. We may use and disclose your Personal Data where required by law, such as in keeping and disclosing our accounts, in keeping and disclosing our tax records, and in response to a court order, valid subpoena, or other legal process for the period of time required by such laws. The legal basis for this data processing is our compliance with our legal obligations.

You may object at any time to the processing of your Personal Data unless you provide us with consent for such processing. In that case, you may revoke your consent.

Examples of Personal Data involved in data processing include:

- Name;
- Email address;
- Phone number;
- Username;
- Password;
- Photograph (if voluntarily provided);
- Cookies or other tracking identifiers;
- Internet Protocol (IP) address;
- Information about your device and/or internet browser;
- SSH public key;
- Physical address;
- Information about subscription and payments, including financial information associated with our accounts and payments;
- Tax ID;
- Data about your use of JetBrains Products, services, and your JetBrains Account;
- Comments, voluntarily provided feedback, and any data provided in survey responses or forms; and
- Data in issue reports pertaining to JetBrains Products and services, such as project or device names.

Where appropriate, we will prompt you to give us your consent to collect and process your data as described above. This may happen within JetBrains Products, on the JetBrains Website, or in another environment set up by JetBrains, always in a clear and conspicuous manner. You can manage your Personal Data and opt-outs as described in Section 5, Transparency, below.

3. How We Collect Data

We collect Personal Data directly from you when you interact with our products and services or communicate directly with us. We may also collect data about you from third parties. For example, if you access our products or services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect from that third-party application personal information about you that you have made available via your privacy settings. We also collect data automatically when you visit the JetBrains Website or use JetBrains Products.

- **Automatic collection of personal information**. We may collect certain information automatically when you use our services, such as your IP address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising, and other unique identifiers, browser or device information, location information (including approximate location derived from your IP address), and internet service provider. We may also automatically collect information regarding your use of JetBrains Products, such as pages that you visit before, during, and

after using our products and services, information about the links you click, the types of content you interact with, and the frequency and duration of your activities, and other information about how you use our services.

- **Crash reports**. If you provide crash reports within JetBrains Products, we may collect personal information related to them, including detailed diagnostic information about your device and the activities that led to the crash.
- Please note that you can edit such reports to make sure they do not contain any Personal Data, or you can contact our customer support without providing the logs.
- **Cookies (and other technologies)**. For more information regarding cookies and other tracking technologies, please refer to our Cookie Notice.
- **AI**. If you are using JetBrains AI, we or our LLM providers may collect personal data related to your AI service usage. For more information, please consult our dedicated policy.
- **Online forms**. We may collect Personal Data via a form based on the nature of your interaction with us. Each form explains our purpose for collecting such data in more detail.
- **Social media platforms**. Our products and services may containbuttons for social media platforms, such as Facebook, Instagram, and X, and these buttons might include widgets such as the "Share This" button or other interactive mini-programs. These features may collect personal information such as your IP address, and they may set a cookie to enable them to function properly. Your interactions with these platforms are governed by the privacy policies of the companies providing them.
- **Direct interaction**. We may collect Personal Data from you as part of your interaction with us, for example, when we provide product or sales support to you.

4. How We Protect Children's Personal Data

Our products and services are generally not designed for and are not offered to children under the age of 13. In some cases, there's an exception to this approach, and children under 13 might be able to use our products. When a child confirms that they are under 13 years old, we ask for their parent's or legal guardian's email address to obtain permission to process such Personal Data for this purpose in accordance with COPPA and GDPR. If we don't receive permission within three (3) days or we are denied permission, the Personal Data collected through the form will be automatically deleted after three (3) days. We don't send marketing communications to children under 15 years old. Children between the ages of 13 and 16 are asked to confirm that they discussed the processing of their data with their parents or legal guardians and have their permission.

5. Transparency

To respect your privacy, before using your Personal Data, we will inform you about the categories of Personal Data we collect and the purposes we use them for. We will also inform you about the data management options that you may have. For this purpose, we use agreements, terms of use, and consent notices embedded in JetBrains Products and services, which are available here. You may also contact us at privacy@jetbrains.com.

6. Sharing of Personal Data

Collected Personal Data is shared in accordance with the JetBrains Terms of Use of a given product or service, as well as this Privacy Notice. Additionally, we share collected Personal Data within the JetBrains group of companies described above, which act as joint data controllers and process Personal Data for the purposes described in the section Why We Collect Data and What We Collect, or with our data processors, a list of which can be found here, who help us operate our software and services.

As part of the functionality of a given product or service, collected Personal Data may be shared with other representatives of your company, in accordance with the JetBrains Terms of Use covering that product or service.

Through our JetBrains Website, we may share your Personal Data with third-party advertising partners. These third-party advertising partners may apply technologies and other tracking tools on our services to collect information regarding your activities and your device (e.g. your IP address, cookie identifiers, page(s) visited, location, and time of day). These advertising partners may use this information (and similar information collected from other services) to deliver personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as "interest-based advertising," "cross-context behavioral advertising," or "personalized advertising.

We may also share your Personal Data with certain third parties (such as with tax authorities or with other government bodies exercising their statutory powers) if we are obliged to do so under applicable legislation, to protect our legal rights and those of others, or if such sharing is necessary to achieve the purposes defined in section Why We Collect Data and What We Collect (especially with government bodies or with parties harmed as a result of violations of applicable laws).

If we are involved in a merger, an acquisition, financial due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or a transition of service to another provider. In that case, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

YouTube API Services. We may display YouTube videos on the JetBrains Website using the API client. The API client uses YouTube API Services. By interacting with the video, you agree to YouTube's Terms of Service and acknowledge Google's Privacy Notice. By interacting with the JetBrains Website, you acknowledge our Privacy Notice.

- Information we collect. The API client collects and uses data from YouTube API Services. It also collects information from the devices you use to access the JetBrains Website in accordance with your tracking preferences in accordance with our Cookie Notice.
- **How we use your information**. We use the data collected from the API client to display YouTube videos through it. YouTube can access information about the videos you viewed on the JetBrains Website and display advertisements based on your viewing history. YouTube ad settings are available here. We use first-party and third-party cookies to enhance and personalize your website experience.
- **Sharing**. We may share authorized data with Google (including YouTube).
- **Your rights**. You can manage or revoke Google's access to your data via Google's Security Settings.

7. Security

To secure your Personal Data, our products and services are designed with security, data protection, and privacy in mind.

We encrypt your data in transit and at rest where it is technically feasible. For the protection of data during transmission, we use an up-to-date TLS (Transport Layer Security) protocol to encrypt your data. To encrypt data at rest, we use strong, up-to-date encryption algorithms, such as AES-256. All encryption keys are regularly rotated, and access to them is strictly limited.

We thoroughly review all Personal Data usage processes before implementation to help achieve compliance with applicable data-protection-related laws and to safeguard user information. This is done to minimize data usage and to make sure that you, as the data owner, are informed about the processing. When the reason for data storage expires, and we are no longer required to keep it, we remove your Personal Data from our servers or anonymize it for further usage. Depending on the activity within which your data is collected, it may appear in datasets used for research. Before using the datasets for research or other purposes you are not informed of, we remove or anonymize your Personal Data in the datasets.

We use suppliers to host our products and services and JetBrains Websites and to process your data in accordance with this Privacy Notice. When choosing a supplier, JetBrains performs a supplier risk assessment process to evaluate their compliance with legal regulations and security standards and help ensure that your data is stored in a secure location with appropriate security measures in place.For more details about security at JetBrains, please visit our Trust Center.

8. Location of Your Information

The default location for any Personal Data of our customers is the EU, unless specified otherwise. For Software as a Service products, we may provide the option for our customers to choose between hosting their instance in the EU or in other regions. For JetBrains AI, the default location of Personal Data storage may differ; see this link. At times, JetBrains may process or transfer some of your Personal Data (such as your name and email address) to our affiliate companies or subprocessors outside the EU. Any such transfer and processing will be done in accordance with the applicable laws on data protection and this Privacy Notice and will be based on a relevant adequacy decision of the European Commission, especially regarding standard data protection clauses. For more information, please clickhere.

9. Third-Party Links

JetBrains Products and Websites may contain links to other websites provided by third parties not under JetBrains' control. When following a link and providing information to a third-party website, please be aware that JetBrains is not responsible for the data provided to that third party. This Privacy Notice only applies to JetBrains Websites, so when you visit other websites, even when you click on a link posted on JetBrains Websites, you should read their privacy policies.

10. Your Privacy Choices and Rights

Your Privacy Choices:

The privacy choices you have regarding your personal information are determined by the specific laws applicable to you and your data. The following may apply to you:

- **Email communications**. If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction and product-related emails regarding JetBrains Products you have access to. We may also send you certain non-promotional and transactional communications and you will not be able to opt out of those communications (e.g. communications regarding updates to our terms or to this Privacy Notice).
- **Cookies and personalized advertising**. You may stop or restrict tracking by clicking on the "Opt-Out" link in the footer of our Website. You can adjust your preferences by interacting with the cookie banner that is displayed when you visit the Opt-Out page. Please note that cookie-based opt-outs are effective only on the specific device where you opted out.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the Network Advertising Initiative, the Digital Advertising Alliance, the European Digital Advertising Alliance, and the Digital Advertising Alliance of Canada.

Please note that you must opt out separately in each browser and on each device.

- **Data retention and deletion**. If at any time you choose to cease using JetBrains Products, you may ask for your Personal Data to be removed from our servers by sending a request to privacy@jetbrains.com or via your JetBrains Account. After the Personal Data removal, we may keep pseudonyms of your Personal Data solely as a record of the data removal. Generally, we retain your Personal Data as long as we need to in order to achieve the purpose for which it was collected. We may retain your information if it is required for compliance with legal obligations and/or defense in the event of a violation of the JetBrains Terms of Use and/or Privacy Policies. We may also have copies of your information in application logs, weblogs, and/or backups made for security and support purposes if this is mentioned in a JetBrains Terms of Use or consent text accepted before the Personal Data collection. These backups will not be accessible as separately delineated information. We may store Personal Data pertaining to a customer or user for as long as they are entitled to a license for or usage of JetBrains Products. Further, we may keep the data to protect ourselves from damage in the event of

litigation in accordance with the current legislation. Please note, however, that you must retain a copy of all data that you have placed on our servers in case of any loss. Further, if you cease using our software and/or services, we will not be responsible for the retention of any of your data.

- **Data management**. You may manage your Personal Data in your JetBrains Account, including by opting out of certain kinds of data collection. You can also adjust your preferences in the settings of JetBrains Products. Email preferences can also be set by clicking on the "Unsubscribe" link in the footer of emails sent by us. You are responsible for the correctness of the Personal Data you provide to us. We expect you to check the Personal Data you provide to us, and if any inconsistency appears, update your Personal Data or report the inconsistency to JetBrains.

Your Privacy Rights:

As permitted by applicable law, you may have the right to request a copy of the information that we hold about you. To do so, please go to your JetBrains Account and ask for a copy through the means available there, or contact privacy@jetbrains.com. Where permitted by applicable law, we may charge a fee for this service.

Moreover, as set out in locally applicable Personal Data protection laws, you may have the right to: (i) request access to your Personal Data; (ii) request rectification of your Personal Data; (iii) request the erasure of your Personal Data; (iv) request a restriction on the processing of your Personal Data; (v) request Personal Data portability; or (vi) object to, or opt-out of, the processing of your Personal Data in some cases.

- **Right of access**. You may have the right to obtain from us a confirmation as to whether or not Personal Data concerning you is being processed, and, where that is the case, to request access to your Personal Data. The information about Personal Data processing includes the purposes of the processing, the categories of Personal Data concerned, the recipients or categories of recipients to whom your Personal Data has been or will be disclosed, etc. However, this is not an absolute right, and the interests of other individuals may restrict your right of access. Further, you may have the right to obtain a copy of your Personal Data undergoing processing. For additional copies requested, we may charge a reasonable fee based on administrative costs.
- **Right to rectification**. You may have the right to obtain from us the rectification of inaccurate Personal Data. Depending on the purposes of the processing, you may have the right to have incomplete Personal Data made complete, in particular by providing a supplementary statement.
- **Right to erasure (right to be forgotten)**. Under certain circumstances, you may have the right to require us to delete your Personal Data.
- **Right to a restriction of processing**. Under certain circumstances, you may have the right to require us to restrict the processing of your Personal Data. In this case, the respective Personal Data will be marked and may only be processed by us for certain purposes.
- **Right to Personal Data portability**. Under certain circumstances, you may have the right to receive the Personal Data that you have provided us concerning you in a structured, commonly used, and machine-readable format, and to transmit this Personal Data to another entity.
- **Right to Object**. Under certain circumstances, you may have the right to object at any time, on grounds relating to the particular situation, to the processing of your Personal Data by us, and we may be required to no longer process your Personal Data.

These rights can be exercised by sending an email to privacy@jetbrains.com.

You may also contact JetBrains to get up-to-date information about the processing of your Personal Data and any Personal Data recipients.

You may lodge a complaint related to the processing of your Personal Data with the competent data protection authority for the country where you are located or with theCzech data protection authority, as we are based in that country.

11. Changes to This Notice

This Privacy Notice is current as of the date of the last update set forth above. We may change this Privacy Notice from time to time, so please be sure to check back periodically. We will post any changes to this Privacy Notice on the JetBrains Website. If we make any changes to this Privacy Notice that materially affect our practices with regard

to the Personal Data we have previously collected from you, we will endeavor to provide you with an advance notice of such changes by highlighting them on the JetBrains Website.

12. Contact Us

If you have any questions or concerns, or if you feel that this Privacy Notice has been violated in any way, please let us know immediately by contacting privacy@jetbrains.com. If you wish to contact our DPO, please contact dpo@jetbrains.com.

13. Privacy Notice Specifications for California Residents

NOTICE AT COLLECTION AND SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

This Notice at Collection and Supplemental Notice for California Residents describes our information practices pursuant to applicable California privacy laws, including the California Consumer Privacy Act (the "CCPA"), as amended. To the extent you are a California resident, and we collect "personal information" subject to the CCPA, the following applies. This section does not address or apply to our handling of publicly available information or personal information that is otherwise exempt under the CCPA.**An Important Note**: This Privacy Notice does not apply to any of the personal information that we process on behalf of our customers through their use of our products and services ("**Customer Underlying Data**"). Our customers' respective privacy policies govern their collection and use of Customer Underlying Data. Our processing of Customer Underlying Data is governed by the contracts that we have in place with our customers, not this Privacy Notice. Any questions or requests relating to Customer Underlying Data should be directed to the relevant customer.

Categories of Personal Information Collected and Disclosed

The following table describes the categories of personal information JetBrains collects and the categories of third parties to whom we may disclose this information for a business or commercial purpose.

Category of Personal Information Collected by JetBrains	Category of Third Parties We May Disclose Personal Information to for a Business Purpose
Identifiers: Name, signature, address, unique personal identifier, online identifier, Internet Protocol address, and telephone number.Note: Some personal information included in this category may overlap with other categories.	• Business partners • Affiliates • Data analytics providers • Advertising networks • Advisors and agents • Others as required by law
Customer records: Name, contact information, and financial or payment information (e.g. bank account number).	• Business partners • Affiliates • Advisors and agents • Others as required by law
Commercial information: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	• Business partners • Affiliates • Data analytics providers • Advertising networks • Advisors and agents • Others as required by law

Category of Personal Information Collected by JetBrains	Category of Third Parties We May Disclose Personal Information to for a Business Purpose
Internet or other electronic network activity: Browsing history, search history, and information on a consumer's interaction with an internet website, application, or advertisement.	• Business partners • Affiliates • Data analytics providers • Advertising networks • Advisors and agents • Others as required by law
Location data: Physical location based on IP address and physical address.	• Business partners • Data analytics providers • Advertising networks • Advisors and agents • Others as required by law
Inferences drawn from other personal information to create a profile about a consumer: Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	• Business partners • Data analytics providers • Advertising networks • Advisors and agents • Others as required by law

Sources of Personal Information

For details on sources of personal information, see the section **How We Collect Data**. More details are available upon request.

Purposes of Collection, Use, and Disclosure

As described in more detail above in Sections 2 and 6, **Why We Collect Your Data and What We Collect** and **Sharing of Personal Data**, in general, we may collect, use, disclose, and otherwise process personal information for the following business or commercial purposes and as otherwise directed or consented to by you:

- To provide our products and services to you;
- To protect us from piracy and the unlawful use of our software or services;
- To improve our offerings based on usage;
- For JetBrains' internal evidence and to protect the rights and interests of JetBrains and other users;
- To advertise and market our products and services to you;
- General business and operational support; and,
- To comply with applicable laws.

"Sales" and "Sharing" of Personal Information.

The CCPA defines "sale" as disclosing or making available personal information to a third party in exchange for monetary or other valuable consideration, and "sharing" includes disclosing or making available personal information to a third party for purposes of cross-context behavioral advertising. While we do not disclose personal information to third parties in exchange for monetary compensation, we may "sell" or "share" the following categories of personal information: identifiers, internet and network activity information, location data (via your IP address), and inferences. We may disclose these categories to third-party advertising networks, analytics providers, and social networks for purposes of marketing and advertising and to improve and measure our ad campaigns.

We do not sell or share sensitive personal information, nor do we sell or share personal information about individuals we know are under the age of sixteen (16).

Retention of Personal Information.

We store the personal information we collect as described in this Privacy Notice for as long as you use JetBrains Products or as necessary to fulfill the purpose(s) for which it was collected, provide our products and services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws, or based upon other criteria, including, but not limited to, the sensitivity and volume of such data. Additionally, we endeavor to retain all such personal information in accordance with legal requirements.

De-Identified Information. If we create or receive de-identified information, we will maintain and use such de-identified information in de-identified form. We will not attempt to reidentify such information, except to comply with applicable law.

Privacy Rights for Residents of California

The CCPA provides California residents with specific rights regarding personal information. Subject to certain conditions and exceptions, California residents have the following rights:

- **Right to know**. You have the right to request (i) the categories of personal information we collected about you; (ii) the categories of sources from which the personal information is collected; (iii) our business or commercial purposes for collecting, selling, or sharing personal information; (iv) the categories of third parties to whom we have disclosed personal information; and (v) a copy of the specific pieces of personal information we have collected about you.
- **Right to Delete**. You have the right to request us to delete any personal information we have collected from you.
- **Right to Correct**. You have the right to request us to correct inaccuracies in your personal information.
- **Right to Opt Out of Sales and Sharing**. You have the right to opt out of "sales" and "sharing" of your personal information, as those terms are defined under the CCPA.
- **Right to Limit Use of Sensitive Personal Information**. You have the right to limit the use and disclosure of your sensitive personal information. We do not collect, use, or disclose sensitive personal information; thus, this right is not available to California residents.
- **Non-Discrimination**. |You have the right not to receive discriminatory treatment by us for the exercise of your rights conferred by the CCPA.

Submitting CCPA Requests

California residents may exercise their CCPA privacy rights as set forth below:

Right to Know, Delete, and Correct. California residents may submit CCPA requests to access/know, delete, or correct their personal information by sending an email to privacy@jetbrains.com.

Authorized Agent.Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To authorize an agent, provide written authorization signed by you and your designated agent and contact us as set forth in the **Contact Us** subsection below for additional instructions.

Verification. To protect your privacy, we will take steps to reasonably verify your identity before fulfilling your request. These steps may involve asking you to provide sufficient information that allows us to reasonably verify that you are either the person about whom we collected personal information or an authorized representative, or we may ask you to answer questions regarding your account and use of our products and services. If we cannot verify your identity or authority to make a request, we may not be able to fulfill your request.

Right to Opt Out of Sales and Sharing. To exercise your right to opt out of the "sale" or "sharing" of your personal information, you may do so via our cookie preference manager. We will apply your opt-out based upon the personal information in our records that is linked or reasonably linkable to the information provided in your request. You may also click the "Do Not Sell or Share My Personal Information" link. Please note that your request to opt out of sale or sharing will be linked to your browser identifier only. If you use a different computer or internet browser to access our sites, you will need to renew your cookie management choices.

GPC. In addition, if we detect that your browser or device is transmitting an opt-out preference signal, such as the "global privacy control" (GPC) signal, we will opt that browser or device out of cookies that result in the "sale" or "sharing" of your personal information. If you come to our Website or use our services from a different device or

from a different browser on the same device, you will need to opt out, or use an opt-out preference signal, for that browser and/or device as well. More information about GPC is available at https://globalprivacycontrol.org/.

California Shine the Light. The California "Shine the Light" law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

Right for minors to remove posted content. Where required by law, California residents under the age of 18 may request to have their posted content or information removed from the publicly viewable portions of the services by contacting us directly as set forth in the **Contact Us** subsection below or by logging into their account and removing the content or information using our self-service tools.

Contact Us

If you have any questions or concerns, or if you need to contact us regarding your privacy rights, please email us at privacy@jetbrains.com.

14. Privacy Notice Specifications for Certain U.S. Jurisdictions

Residents of certain U.S. states, including Colorado, Connecticut, Utah, and Virginia, require additional disclosures under applicable privacy laws.

Sale of Personal Information

While we do not disclose personal information to third parties in exchange for monetary compensation, we may "sell" or "share" the following categories of personal information: identifiers, such as unique personal identifiers, online identifiers, IP address, or other similar identifiers; location data (via your IP address); internet and network activity information; and inferences. We may disclose these categories to third-party advertising networks, analytics providers, and social networks for the purposes of marketing and advertising and to improve and measure our ad campaigns.

Consumer Rights

Residents of certain U.S. states, including Colorado, Connecticut, Utah, and Virginia, may have, subject to certain limitations, additional rights under applicable privacy laws, which may include:

Access. The right to confirm whether we are processing their personal information and to obtain a copy of their personal information in a portable and, to the extent technically feasible, readily usable format.

Deletion. The right to delete their personal information provided to or obtained by us.

Correction. The right to correct inaccuracies in their personal information.

Opt Out. The right to opt out of certain types of processing, including:

- To opt out of the "sale" of their personal information;
- To opt out of targeted advertising by us; and
- To opt out of any processing of personal information for the purpose of making decisions that produce legal or similarly significant effects.

You may submit a request to exercise most of your privacy rights under U.S. state privacy laws through our webform or by emailing us at privacy@jetbrains.com.

To opt out of targeted advertising by us, you can adjust your cookie settings here or on your device. In addition, our Website responds to global privacy control (GPC) signals, which means that if we detect that your browser is communicating a GPC signal, we will process that as a request to opt that particular browser and device out of sales and sharing (i.e., via cookies and tracking tools) on our Website. Note that if you come back to our Website on a different device or use a different browser on the same device, you will need to opt out (or set GPC) for that browser and device as well. More information about GPC is available at https://globalprivacycontrol.org/.

We will respond to your request as required under applicable U.S. privacy law(s). When you submit a request, we will take steps to verify your identity and request by matching the information provided by you with the information

we have in our records. In some cases, we may request additional information in order to verify your identity, or, where necessary, to process your request. If we are unable to verify your identity after a good-faith attempt, we may deny the request. If your request is denied, we will explain the basis for the denial.

If we deny your request, in certain jurisdictions you may be able to appeal our decision according to the instructions we provide in our response.

To the extent required under applicable U.S. privacy laws, you may also designate someone as an authorized agent to submit requests and act on your behalf. Authorized agents may be required to provide proof of their authorization and we may also require the relevant consumer to directly verify the identity and authority of the authorized agent.

15. Privacy Notice Specifications for Chinese Customers

If you're a customer of JetBrains Shanghai, please refer to the dedicated Shanghai Privacy Notice, which is applicable to processing of your Personal Data when interacting with our Website and ordering JetBrains Products. The processing of your Personal Data while using JetBrains Products is governed by this Privacy Notice.