

Pendo's Data Processing Addendum Frequently Asked Questions

Pendo processes data provided and/or collected by its customers in the course of delivering its services. Depending on the data a customer elects to provide or collect, this processing may include Personal Data. Pendo's Data Processing Addendum ("**DPA**") details the legal framework applicable to this processing.

Pendo's DPA is specifically tailored to our software experience management platform and reflects how we have operationalized our compliance with applicable data privacy legislation. We have developed this document to answer some of the most frequently asked questions on our DPA and data processing activities.

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1. When does the DPA apply?

You control what data Pendo receives regarding your customers (what we call the "**End Users**"). Pendo's Platform only requires a unique identifier, which can be a randomly generated value that contains no Personal Data. Whether Pendo processes any Personal Data depends entirely on what categories of data you configure the Services to collect.

If you choose to include Personal Data (such as names, email addresses, or other identifiers), the DPA governs how Pendo processes that data on your behalf. If you configure the Services to collect only anonymized data, the DPA remains part of your agreement, but imposes minimal additional obligations because no Personal Data is being processed. Should your use cases for Pendo change and you commence the provision or collection of Personal Data for processing, the DPA will be in place to govern that activity.

2. When does the DPA not apply?

The DPA does not apply to Pendo's Processing of any Personal Data for its own business/customer relationship administration purposes, its own marketing or service analytics, its own information and systems security purposes supporting the operation of the Services, nor its own legal, regulatory, or compliance purposes. Please see Pendo's [Privacy Policy](https://www.pendo.io/legal/privacy-policy/) at <https://www.pendo.io/legal/privacy-policy/> for more information on Pendo's Processing of Personal Data for such purposes.

3. Can we use our own DPA?

As a one-to-many SaaS provider, we aim to ensure that our data processing obligations remain consistent across our entire customer base. Accordingly, we are unable to accept a Customer's own data processing addendum as these usually contain custom commitments and requirements that we cannot operationalise compliance with.

Pendo's DPA contains common clauses regarding subprocessor appointments, audit rights, breach notification, restricted transfers of data, and security measures implemented and has been drafted to meet the requirements under Article 28 of the GDPR and under the California Consumer Privacy Act ("CCPA"), as well as other State Privacy Laws.

Using Pendo's DPA also helps streamline review and negotiation by aligning contractual terms with Pendo's actual processing practices.

4. What is Pendo's role under the DPA?

Under the DPA, Pendo processes Customer Personal Data solely on behalf of, and in accordance with, your instructions. In this context, Pendo is a "processor" (or "service provider" under State Privacy Laws) that processes Personal Data for another organization and does not determine the purposes or means of that processing.

Your role under Applicable Data Protection Laws will depend on your specific circumstances and legal relationship with your End Users. Please discuss this matter with your Legal team.

5. What Personal Data will Pendo process?

You have complete control over the categories of data collected within Pendo's Services. Pendo only requires a unique identifier (ID) which does not require any Personal Data and can be a randomly generated value that is anonymous to Pendo.

However, we understand all businesses are different and weigh the risks and rewards of collecting different kinds of data. You are able to change your data collection to include more or less Personal Data at any time directly in Pendo's Platform. Everything you collect is treated with the same high security standards.

Beyond that required ID, you have complete control over what additional data you collect. You can configure the Services to capture:

- No Personal Data at all (anonymous IDs only)
 - Limited Personal Data (e.g., business email addresses for internal users)
 - Additional data based on your business needs and risk tolerance
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6. Do I need to inform End Users that we will be sending data to Pendo for processing?

Under the DPA, customers are responsible for determining whether notice to, or consent from, their End Users is required in connection with the collection and processing of data through the Services. This determination depends on the categories of data you choose to collect in Pendo and your applicable data protection and privacy obligations.

While Pendo cannot advise on the specific notices or consents you may be required to provide, we are happy to help you understand the controls, configurations, and data processing practices available within the Services to support your compliance efforts, including options to manage what data is collected and how it is accessed or retained.

7. Where will my data be hosted?

Pendo offers global data hosting options. You can elect for Pendo to host your data in the **United States, European Union, Japan, or Australia**. Details of Pendo's hosting environments are available in our [Help Center](#).

8. How will Pendo protect my Personal Data?

Pendo has implemented appropriate technical and organizational measures to protect all Customer Data which includes Customer Personal Data, against unauthorized access, use, alteration, or accidental loss. These measures are detailed in Pendo's **Security Exhibit** at <https://www.pendo.io/contract-center/customers>, which is incorporated into both the DPA and your Terms of Service.

Key protections include:

- **Encryption:** Data in transit and at rest
- **Access controls:** Role-based access limitations and multi-factor authentication
- **Network security:** Firewalls, intrusion detection, and regular vulnerability testing
- **Incident response:** 24/7 security monitoring and documented breach response procedures
- **Vendor management:** Security due diligence on all Sub-Processors before engagement
- **Third-party validation:**
 - **SOC 2 Type 2 certification** (annual independent audit of security controls)
 - **ISO 27001 certification** (information security management)
 - **Regular penetration testing** by independent security firms

You can access Pendo's current **Security Exhibit** at <https://www.pendo.io/contract-center/customers>, as well as our SOC 2 reports and additional certifications through Pendo's **Trust Center** at <https://trust.pendo.io/> or by contacting your account representative.

As a customer you are responsible for properly configuring the Services according to the Documentation, safeguarding your login credentials and API keys, securing your own systems that integrate with Pendo, and implementing access controls for your Users.

9. Does Pendo transfer Personal Data outside the EEA/UK?

Yes. Pendo may transfer Customer Personal Data outside the EEA/UK in connection with delivering the Services, including for customer support and service operations.

Pendo uses multiple legal mechanisms to ensure lawful transfers, depending on where your data is transferred to:

For transfers to the United States: Pendo.io, Inc. is certified under the EU-U.S. Data Privacy Framework, the UK Extension, and the Swiss-U.S. Data Privacy Framework (collectively, "**DPF**"). This certification provides an adequacy mechanism recognized by the European Commission, the UK Government, and Swiss authorities for transfers of

Personal Data to Pendo in the U.S. Pendo's current certification is valid through November 2026 and will be renewed as long as the DPF remains a valid transfer mechanism.

For other international transfers: Pendo incorporates Standard Contractual Clauses (SCCs) into the DPA. SCCs are contractual terms approved by the European Commission that create legally binding data protection obligations on companies receiving Personal Data from the EEA, UK, or Switzerland. The SCCs require Pendo to:

- Process data only on your instructions
- Implement appropriate security measures
- Notify you of data breaches
- Assist with data subject rights requests
- Allow you to audit compliance
- Delete or return data upon termination

You do not need to sign separate SCC documents. The SCCs are deemed incorporated into your DPA automatically when applicable. If you need executed copies for your records (for example, if requested by a Supervisory Authority), you can request them by contacting privacy@pendo.io.

You remain responsible for assessing whether these transfer mechanisms are appropriate for the specific Personal Data you choose to send to Pendo and for conducting any Transfer Impact Assessments required under your applicable data protection obligations.

10. Will third-party Processors process our Personal Data?

Yes, Pendo engages Sub-Processors to assist with the provision of its Services. Pendo conducts appropriate due diligence on the data privacy and security practices of each Sub-Processor before engaging them to Process Customer Personal Data.

You can find details of Pendo's current **Sub-Processors** at our **Trust Center** at <https://trust.pendo.io/subprocessors>. This list is updated whenever Pendo adds or changes a Sub-Processor.

Please note that Pendo, in addition to its US headquarters in Raleigh, North Carolina, has global offices, which has local employees, as well as remote employees as needed. Some of these employees may work directly with your data to be able to deliver you the services you are contracting for. As such, we separately list Pendo's "Affiliates" on the Sub-Processors page of our Trust Center.

11. How will I be notified of any new Sub-Processors?

Pendo will notify you via email of any changes to its list of Sub-Processors provided that you have subscribed to receive such updates. You can do this by visiting our **Trust Center** at <https://trust.pendo.io/> and selecting the 'Subscribe to updates' option with the bell icon at the top of the page.

12. When will I be notified in the event of a Personal Data Breach?

In accordance with the requirements of the GDPR, Pendo will notify your designated contact (named on your Order Form for the Services) without undue delay upon discovering a Personal Data Breach affecting your Personal Data. We do not commit to fixed timeframes (like 24 or 72 hours) to ensure all resources are focused on proper investigation and remediation of the Personal Data Breach, and we will provide continuous updates following the

initial notification to you. You remain solely responsible for determining whether the breach must be reported to a Supervisory Authority or affected Data Subjects under Applicable Data Protection Laws and for making any such notifications.

13. How are Data Subject Requests handled?

If you receive a Data Subject Request from an End User, you can submit a request for assistance to Pendo Support by contacting privacy@pendo.io.

Depending on the nature of the Data Subject Request from an End User, you may have access to certain self-serve functionality to respond to such request:

- If your request is for data deletion, you can do this programmatically using the Pendo API endpoint. For more information, see our **Help Center article** '[Bulk delete accounts and visitors through the API](#)'
- Data deletion makes use of DNP, which is shorthand for the "do not process" setting in Pendo. You can also use DNP in isolation to allow your users to opt-out of data processing without deleting any data history. For more information, see our **Help Center article** '[Opt out of tracking with DNP](#)'

If Pendo receives a Data Subject Request directly from your End User, we will (to the extent possible) notify the End User that they need to submit the request directly to you and you will be responsible for responding, with Pendo providing reasonable assistance.

14. What will happen to my data upon termination of the Services?

Provided that you notify us of your preference within thirty (30) days of the Services termination date, Pendo will either:

- Return a complete copy of all Customer Personal Data by secure file transfer; or
- Delete or irreversibly anonymize all Customer Personal Data within Pendo's possession.

If you do not instruct Pendo within this period (and in any case following the return of Customer Personal Data), Pendo will promptly delete or irreversibly anonymize all Customer Personal Data.

15. Can you complete a Transfer Impact Assessment ("TIA") relating to your Services?

Pendo does not complete TIAs for or on behalf of its customers, though we are happy to continue to assist you with fact-based information about our services. You are the party best positioned to make legal judgments based on the type of data you are collecting and sending to Pendo.

16. What should I do if I have privacy-related questions regarding the Services?

If you have any questions about how Pendo processes Customer Personal Data, please:

- Visit our **Trust Center** at <https://trust.pendo.io/> for security and compliance information
- Review our **Privacy Policy** at <https://www.pendo.io/legal/privacy-policy/>
- Contact privacy@pendo.io
- Contact your Pendo account representative