



Privacy Policy – European Union

Version: 09/2026

Created by Gabriel Montiel, Bitkom Consult (Bitkom Service GmbH), as
external data protection officer

1. Who We Are

Trove Information Technologies, Inc., doing business as Pave (“Pave”, “we”, “us”, or “our”), located at 595 Market St., Suite 2000, San Francisco, CA 94105, USA, is the data controller responsible for the processing of personal data described in this policy.

For questions about this policy or about how Pave processes your personal data, please contact us at: privacy@pave.com.

2. EU Representative and Data Protection Officer

VeraSafe has been appointed as Pave's representative in the European Union for data protection matters, pursuant to Article 27 of the General Data Protection Regulation of the European Union. If you are in the European Economic Area, VeraSafe can be contacted in addition to privacy@pave.com, only on matters related to the processing of personal data. To make such an inquiry, please contact VeraSafe using this contact form: <https://verasafe.com/public-resources/contact-data-protection-representative> or via telephone at: +420 228 881 031. Alternatively, VeraSafe can be contacted at: VeraSafe Ireland Ltd. Unit 3D North Point House North Point Business Park New Mallow Road Cork T23AT2P Ireland.

We have designated Bitkom Service GmbH, located at Albrechtstraße 10, 10117 Berlin, Germany, as our Data Protection Officer under Art. 37 GDPR.

Email: datenschutz@bitkom-consult.de

Data subjects and supervisory authorities may contact Bitkom Service GmbH directly in relation to any matter arising under this policy or under applicable data protection law.

3. Scope of This Policy

This policy applies to visitors to our website at pave.com and related subdomains, and to users who create an account and use Pave's products and services.

This policy does not apply to personal data that Pave processes as a data processor on behalf of its business customers. Pave's core product is a compensation intelligence platform that enables companies to benchmark pay in real time, price jobs, and manage merit cycles. To provide this service, business customers connect their HR and payroll systems to Pave via automated integrations and share a selection of employee compensation data with Pave. Pave processes this data on behalf of the relevant employer, not as an independent data controller. The data is aggregated and de-identified for use in Pave's benchmarking product. If you are an employee whose compensation data has been shared with Pave by your employer, your employer is responsible for the lawfulness of that transfer, and you should consult your employer's privacy policy for information on how they handle your data.

4. Data We Collect

4.1 Data You Provide Directly

When you register for an account, we collect your first name, last name, email address and, if you register using email and password rather than single sign-on, your password credentials. We also record your acceptance of our Terms of Use. Depending on how you reach our services, we may collect a partner or referral code, the webpage or source from which you arrived, and campaign information such as UTM parameters stored in your browser. You must provide the registration information identified as required in order to create an account; if you do not provide it, we will be unable to create or administer your account.

4.2 Data Collected Automatically

When you visit our website or use our services, we automatically collect the following data:

- Device and technical data: IP address, device ID, domain server, device type, operating system, and browser type
- Web analytics: website interactions, referring webpage or source through which you accessed our services, non-identifiable request IDs, and statistics associated with the interaction between your device or browser and our services
- Location data: IP-address-based location information, collected where you use a location-enabled browser

We also collect data through cookies and similar tracking technologies. See Section 12 for details.

4.3 Data from Third Parties

We may receive personal data from the following categories of third parties:

- Other users of our services, for example where a colleague provides your contact details to grant you access
- Co-marketing and business partners, analytics providers, deal and lead registration providers, conference organizers, and advertising and marketing agencies

- Public databases and publicly accessible content
- Social media platforms, where you interact with us through them

We may combine data received from third parties with data we collect directly from you.

5. How We Use Your Data

We process your personal data for the following purposes:

- To create and manage your account and provide the services you have requested
- To provide support and assistance for our services
- To improve our services through testing, research, internal analytics, and product development
- To personalize our services and communications based on your preferences
- To ensure the security of our systems, detect fraud, and carry out debugging
- To send marketing communications where you have consented or where we have a legitimate interest and you have not opted out
- To manage sign-up for our newsletter and schedule product demonstrations
- To comply with applicable legal obligations and respond to lawful requests from competent authorities
- To enforce our agreements and exercise or defend legal claims

6. Legal Bases for Processing (Art. 6 GDPR)

We process your personal data on the following legal bases:

- Performance of a contract (Art. 6(1)(b) GDPR): processing necessary to provide the services you have signed up for, including account management and access to our platform
- Legitimate interests (Art. 6(1)(f) GDPR): improving our products and services based on usage data, sending direct marketing communications to existing customers, detecting and preventing fraud and abuse, and ensuring the security of our network

and information systems. We have assessed that our interests in these activities are not overridden by your interests or fundamental rights and freedoms, taking into account the following: the data processed for these purposes is limited to what is necessary for each specific purpose, we implement appropriate technical and organizational safeguards, and you retain the right to object to any processing based on legitimate interests at any time (see Section 10)

- Consent (Art. 6(1)(a) GDPR): placing non-essential cookies, sending marketing communications to prospective customers, and certain data sharing with advertising partners. You may withdraw consent at any time without affecting the lawfulness of prior processing
- Compliance with legal obligations (Art. 6(1)(c) GDPR): retaining records as required by applicable law and responding to lawful requests from competent public authorities

7. Data Sharing and Recipients

Pave shares personal data with the following categories of recipients:

- Service providers and subprocessors: cloud infrastructure providers, analytics tools, customer support platforms, and email delivery providers
- Business customers: where you use Pave's platform in connection with your employer's HR systems, your employer may have access to data as permitted by our agreement with them
- Advertising and analytics partners: for improving our marketing and understanding product usage, subject to your consent, where required by applicable law, and the preferences you select through our cookie consent tool
- Competent authorities: where required by applicable law or a binding court order

Pave does not sell your personal data.

8. International Data Transfers

Pave is based in the United States. Where we transfer personal data from the European Economic Area (EEA) to the United States or to another third country, we rely on the Standard Contractual Clauses (SCCs) adopted by the European Commission under Decision 2021/914 as the transfer mechanism under Art. 46(2)(c) GDPR, unless the transfer is covered by an adequacy decision of the European Commission that applies to the recipient concerned.

The SCCs are incorporated into our Data Processing Addendum, available at <https://www.pave.com/data-processing-addendum>. You may also contact privacy@pave.com to request additional information about the safeguards applicable to a transfer of your personal data.

In addition to the SCCs, Pave conducts Transfer Impact Assessments (TIAs) for transfers to its own subprocessors to evaluate whether applicable third-country law could undermine the level of protection the SCCs guarantee. These assessments are available to competent supervisory authorities upon request.

9. Data Retention

We retain personal data for as long as necessary to fulfill the purposes described in this policy, unless a longer retention period is required or permitted by applicable law.

We retain account data for the duration of your account and for thirty (30) days after closure, unless a different period has been agreed between the parties. Usage logs are retained for six (6) months. Marketing data is retained until you withdraw your consent. Where data is required for the exercise or defense of legal claims, we retain it until expiry of the applicable limitation period.

When personal data is no longer required, we delete or anonymize it in accordance with our internal deletion procedures.

10. Your Rights Under the GDPR

As a data subject in the EEA, you have the following rights:

- Right of access (Art. 15 GDPR): you may request a copy of the personal data we hold about you
- Right to rectification (Art. 16 GDPR): you may ask us to correct inaccurate or incomplete data
- Right to erasure (Art. 17 GDPR): you may ask us to delete your personal data, subject to applicable legal retention requirements
- Right to restriction of processing (Art. 18 GDPR): you may ask us to restrict how we use your data in certain circumstances
- Right to data portability (Art. 20 GDPR): you may request your personal data in a structured, commonly used, machine-readable format
- Right to object (Art. 21 GDPR): you may object to processing based on legitimate interests or to direct marketing at any time
- Right to withdraw consent (Art. 7(3) GDPR): where processing is based on your consent, you may withdraw it at any time without affecting the lawfulness of processing carried out before withdrawal

To exercise any of these rights, please contact privacy@pave.com or our Data Protection Officer at datenschutz@bitkom-consult.de. We will respond without undue delay and ordinarily within one month after receiving your request. Where permitted by law, we may extend this period by up to two additional months due to the complexity or number of requests, in which case we will inform you of the extension and the reasons for it within one month after receiving your request.

You also have the right to lodge a complaint with the supervisory authority of your country of habitual residence, place of work, or the place where you believe an infringement of applicable data protection law has occurred. A list of national supervisory authorities in the EEA is available at https://www.edpb.europa.eu/about-edpb/about-edpb/members_en.

11. Automated Decision-Making and Profiling

Pave does not make decisions based solely on automated processing, including profiling, that produce legal effects concerning you or similarly significantly affect you within the meaning of Art. 22 GDPR.

12. Cookies and Tracking Technologies

Pave uses cookies and similar technologies, including pixel tags, web beacons, and JavaScript (collectively, "cookies") on its website and platform to operate and improve our services, analyze usage patterns, and serve relevant advertising. When you first visit our website, we ask for your consent to non-essential cookies via our cookie consent tool. You may withdraw or change your consent preferences at any time via the cookie settings link in the footer of our website.

We use the following categories of cookies:

- Strictly necessary cookies are required to provide the features and services you have requested, including access to secure areas of our website. These cookies are exempt from the consent requirement under Art. 5(3) of Directive 2002/58/EC and its national implementations, and the associated processing is based on our legitimate interest in operating a functional and secure website (Art. 6(1)(f) GDPR).
- Functional cookies record your choices and settings, maintain your preferences over time, and recognize you when you return to our website. These cookies are placed on the basis of your consent (Art. 6(1)(a) GDPR).
- Performance and analytics cookies collect information about how users interact with our website, including page views, session duration, and the performance of our advertising campaigns. These cookies are placed on the basis of your consent (Art. 6(1)(a) GDPR).
- Retargeting and advertising cookies collect data about your online activity to identify your interests and serve advertising that is relevant to you. This may include cookies placed by third-party ad networks, ad servers, and advertising technology providers, which may track your activity across other websites and over time. These cookies are placed on the basis of your consent (Art. 6(1)(a) GDPR).

13. Changes to This Policy

We may update this policy from time to time to reflect changes in our practices or applicable law. The version indicated at the top of this policy reflects the most recent update.