

Glean Privacy Notice

Building trust through transparent privacy practices

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At Glean we're committed to being transparent and responsible in our approach to handling your personal data. If you interact with our website (including contacting us), use our software products and services, engage with us on social media, or attend one of our events, then this page is for you. Here we explain how and why we use your personal data, and what your privacy rights are.

We need to let you know up front that our website and software products and services aren't intended for children. We don't knowingly collect personal data relating to children under the age of 13.

Have feedback or questions about this Privacy Notice? Reach out to us at legal@glean.co.

Changes to this Privacy Notice

Although major changes are rare, we'll update this Privacy Notice when we need to, so that it remains accurate and up-to-date. This could be when we release new product features or when legal requirements change.

We won't ever make big changes without letting you know first and, when necessary, we'll get your consent. If we have your contact information in our database, we'll send you an email about upcoming changes. If you use our software products and services, we'll also let you know in an in-app message. You can read about important changes we've made to this Privacy Notice [here](#).

Who are Glean and what do you do?



We're glad you asked! At Glean, we create, develop and sell amazing audio note-taking software products and services to people and organisations around the world. You can learn more about what we do [here](#).

Glean is our company trading name, we were previously called Sonocent. Our business is made up of two legal entities:

- Sonocent Ltd - the parent company and Head Office, based in Leeds, UK
- Sonocent LLC - the subsidiary company, based in Florida, US

You can find full contact information for our offices [here](#).

So that you know, Sonocent Ltd is the [Data Controller](#) of your personal data. We might also need to share your personal data with Sonocent LLC, from time to time.

Glean and the UK General Data Protection Regulation (UK GDPR)

Because we're a UK Headquartered company with lots of UK customers and website visitors, Glean must follow the rules of the UK GDPR when it comes to handling personal data. The UK GDPR is one of the most comprehensive privacy regulations in the world currently. You can learn more about this on the UK Information Commissioner's Office (ICO) website, [here](#). With that said, at Glean, we believe that **everyone, no matter where they live**, deserves to have their privacy protected to the same high standard. That's why we follow the key principles of the UK GDPR for **all** the personal data that we handle. So whether you're in London or Washington D.C., you can expect the same treatment from us.

What are the UK GDPR principles?

- Personal data processing must be lawful, fair, and transparent
- Only process personal data for specific, legitimate purposes
- Don't process more personal data than is necessary
- Keep personal data up-to-date where possible
- Don't keep personal data for longer than is necessary
- Process personal data securely
- Be accountable

What is Personal Data?

Any information that can be used to identify you, whether directly or indirectly. Some examples include: name, email address, Internet Protocol (IP) address, telephone number.

What is Data Processing?

It means “doing something” with personal data. This can include:

- Collecting data
- Storing data
- Changing data
- Accessing data
- Viewing data
- Moving data from one place to another
- Organising data
- Categorising data
- Sharing data
- Disclosing data
- Restricting data
- Deleting data

Data Controller and Data Processor

A Data Controller makes decisions about how and why your personal data is processed. The Data Controller should always

explain the purposes of processing personal data in a Privacy Notice - like this one!

A Data Processor processes personal data *on the behalf of* a Data Controller, which means that it must follow the instructions given to it by the Controller. These instructions are a part of the contract between the Controller and the Processor, and are usually set out in a specific Data Sharing Agreement.

✅ Glean has a Data Sharing Agreement in place with every Data Processor that we work with. You can learn more about Data Sharing Agreements on the ICO's website [here](#).

Is Glean a Data Controller or a Data Processor?

We're both - it just depends on the relationship that we have with you.

When Glean is a Data Controller:

- Where you buy or trial an individual Glean software subscription directly through our website or from one of our resellers
- Where you sign up and access the Glean software via your organisation (e.g. your university)
- Where you visit our website
- Where you interact with our website, e.g. setting your cookie preferences, sending us a message through one of our contact forms, downloading our [security page](#) resources
- Where you take part in a Glean competition, survey, or case study
- Where you sign up for one of our events or connect with us at an event

When Glean is a Data Processor:

- Where you're an organisation that has purchased a Glean software subscription for the people at your organisation to use.
 - 💡 *In order to provide your people with access to Glean, you'll first need to share your name and email address with us so that we can set up your Glean Administrator access. Then, you'll need to provide us with the names and email addresses of the people that want to use Glean. You'll do this using our in-app Glean Admin Portal. We'll only use this personal data for the purpose of triggering an email inviting the person to create a user account.*
- Where you're an Assistive Technology Service Provider (ATSP) or similar third party, that is providing individuals access to the Glean software as part of a disability accommodation scheme.
 - 💡 *In order to provide these individuals with access to Glean, you'll first need to share your name and email address with us so that we can set up your Glean Administrator access. Then, you'll need to provide us with the names and email addresses of the people that want to use Glean. You'll do this using our in-app Glean Admin Portal. We'll only use this personal data for the purpose of triggering an email inviting the person to create a user account.*

What personal data does Glean collect and process?

The kind of personal data that we collect from you varies based on how you interact with us. Some personal data will be provided directly by you, for example, if you contact our customer support team. Other personal data will be collected by us automatically as you interact with our website or use our software. We get into the detail below, including explaining the reasons why we collect your

personal data, and the legal basis for doing so (sometimes there's more than one legal basis).

Glean website visitors and social media users

You're interacting with our website or engaging with us on our social media channels 

Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
<p>Information relating to cookies:</p> <p>User identifier (linked to your browsing session)</p> <p>Preferences (e.g. your language settings)</p> <p>Data about your browsing behaviour (e.g. which parts of our website you've clicked on or looked at)</p>	<p>We'll collect this data through our use of cookies and similar technologies. We need to collect this data so that we can deliver a website, marketing, and advertising experience that matches your chosen preferences.</p>	<p>Necessary to comply with a legal obligation (by law we need to let you know about our use of cookies and similar technologies).</p>


Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
<p>First name and last name</p> <p>Email address</p> <p>Mobile telephone number (optional)</p> <p>College/University name (optional)</p>	<ol style="list-style-type: none">1. If you contact us using our website contact forms, we'll collect this data so that we can reply to your message appropriately.2. Where we've collected your email address, we'll use it to let you know about important updates to this Privacy Notice.3. We may also use your email address to send you marketing communications (by email) about our events, products, and services.4. Where we've collected your mobile telephone number, we'll use it to send you marketing communications about our events, products, and services.	<ol style="list-style-type: none">1. You have given consent (you've contacted us and expect a reply).2. Necessary to comply with a legal obligation (by law we need to let you know about legal changes to this Privacy Notice).3. Necessary for our legitimate interests (to grow our business; to inform our marketing efforts).


Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
<p>Internet Protocol (IP) data:</p> <p>IP city</p> <p>IP country</p> <p>IP country code</p> <p>IP state/region</p> <p>time zone.</p>	<p>We'll collect this data automatically when you visit our website so that we understand where you're visiting from, which pages you're visiting, and how many times you're visiting them. This is part of our website analytics.</p>	<p>Necessary for our legitimate interests (we use analytics to measure the success of our website, to improve our website; to improve visitor experience; to inform our marketing efforts).</p>
<p>Geolocation (the specific geographic area from which your device is interacting with us)</p>	<p>We'll collect this data automatically when you visit our website. This is so that we can localise your interaction with us. For example, we'll display our website pages in your preferred language and show you content, including pricing, appropriate to your location.</p>	<p>Necessary for our legitimate interests (to deliver a website experience appropriate to location; to help us improve our website; to grow and develop our business).</p>

Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
<p>Technical data:</p> <p>Device type (e.g. desktop, mobile)</p> <p>Operating system type (e.g. Windows, iOS, Android)</p> <p>Browser type and version (e.g. Chrome, Edge)</p>	<p>Where you contact us using the <i>Contact Us</i> form on our Help Center page or, the <i>Need Help</i> form on the Sign In page, we'll collect this data automatically.</p> <p>Understanding what kind of device, operating system, and browser you're using helps us to provide you with a better customer support experience.</p>	<p>Necessary for our legitimate interests (to help us to troubleshoot queries and issues effectively; to improve our customer support experience; to improve our products and services; to develop our business).</p>
<p>Glean website pages you have visited (the name of the page visited)</p>	<p>Where you contact us using the contact forms on our website, we'll collect this data automatically.</p> <p>Understanding which pages you have visited helps us to provide you with a better customer support experience.</p>	<p>Necessary for our legitimate interests (to help us to troubleshoot queries and issues effectively; to improve our customer support experience; to improve our products and services; to develop our business).</p>

Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
Anything else you choose to share with us if you contact us through our website or on our social media platforms	We'll collect this data so that we can respond to your query appropriately.	You have given consent (you've contacted us and expect a reply).

Event attendees and networking connections

You're attending one of our webinars or networking events, or you've connected with us at a conference 


Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
First name and last name Email address 	1. We'll ask you to provide this data so that we can register your attendance and allow you to access the event. Where an in-person event is held at our lovely Glean offices, we'll also need to	1. You have given consent (you want to sign up and attend our event). 2. Necessary for our legitimate interests (to run our events; to grow our business; to inform our marketing efforts).

Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
	<p>collect your name for Health and Fire Safety reasons in line with our external visitor policy.</p> <p>2. We'll also collect this data from you so that we can communicate with you, which may include sending you marketing communications (by email) about our events, products, and services.</p> <p>3. Where we've collected your email address, we'll use it to let you know about important updates to this Privacy Notice.</p>	



Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest



Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
<p>Other information, depending on the specific event. This could include but isn't limited to:</p> <p>Telephone number</p> <p>Where you're based (e.g. current city)</p> <p>What you do (e.g. student, teacher, worker)</p> <p>The name of your employer, university, or college</p> <p>Age bracket (e.g. 21-30)</p> <p>Your responses to any surveys you participate in</p> <p>Anything else you choose to share with us and agree to us taking a note of</p> 	<ol style="list-style-type: none"> 1. We'll collect this data from you so that we can better understand who are our audience are, adapt our events so that they're appropriate to our audience, improve our events for future, and make sure that we market our events appropriately and successfully. 2. We'll also use this data to communicate with you, which may include sending you marketing communications (by email) about our events, products, and services. 3. Where you complete a survey, we'll first seek your consent to collect the data and we'll also let you know what 	<ol style="list-style-type: none"> 1. You have given consent (you agree to share personal information with us). 2. Necessary for our legitimate interests (to run our events; to understand who attends our events and why; to improve our events; to inform our marketing efforts; to grow our business).

Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
	the purpose of collecting the data is.	

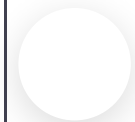
Glean software end users


You're the one using our software ✨ You've purchased an individual subscription or signed up for a free trial. Alternatively, you've been provided access to Glean by a third party (such as your employer, university, disability assessor etc).

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
First name and last name Email address Unique user ID Authentication data (we need to remember that you're logged in to our software so that you	1. We'll ask you to provide this data during the account set-up process so that we can create your Glean user account. This includes if you	1. Performance of a contract with you (to create your user account; to provide the software to you; to let you know about important changes to the agreement we have with you; to let you know about important updates or changes that may

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
don't lose your session)	<p>sign up using Single Sign On.</p> <p>2. We'll also collect this data so that we can communicate with you based on the communication preferences you've selected. Depending on your preferences, this may include:</p> <ul style="list-style-type: none">• letting you know about company news and what we've been up to (marketing and promotional communications)• letting you know about new products, features and web content we've published (marketing and promotional communications)	<p>impact your use of the software; to respond to any request you have; to provide customer support).</p> <p>2. Legal obligation (by law we need to let you know about legal changes that impact our agreement with you).</p> <p>3. Necessary for our legitimate interests (to keep our records up-to-date; to understand how users use our products and services; to inform our marketing efforts; to improve user experience; to improve and develop our products and services; to grow our business.)</p>

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
	<ul style="list-style-type: none">• letting you know about upcoming Glean events (marketing and promotional communications)• inviting you to take part in a survey, competition, feedback session, or beta trial of a new feature (marketing and promotional communications)• letting you know about important changes to your user account and access to the software, e.g. security update, planned maintenance (transactional communications)• fulfilling a request relating to your	



Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
	<p>user account e.g. sending a reset password link (transactional communications)</p> <ul style="list-style-type: none">• responding to your request for customer support (transactional communications)• letting you know about important changes to our legal agreement with you, including this Privacy Notice (transactional communications)	
<p>Mobile telephone number (optional)</p> 	<p>We'll collect this where you agree to sign up to SMS updates from us. We'll use this data to send you marketing communications about our events, products, and services.</p>	<p>Necessary for our legitimate interests to inform our marketing efforts; to improve user experience)</p>

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
Billing address City ZIP/ Postcode (optional) Region (optional) Country	<p>If you purchase a subscription to Glean, we'll ask you to provide this information during the account set up process so that we can set up your paid subscription.</p>	<p>Performance of a contract with you (to set up your subscription; to provide the software to you).</p>
Geolocation (the specific geographic area from which your device is interacting with us).	<ol style="list-style-type: none"> 1. We'll collect this automatically when you create your user account. This is so that we can localise your interaction with us. For example, we'll show you content, including our pricing, appropriate to your location. 2. If you purchase a subscription, we'll use your geolocation to direct you to the 	<p>Performance of a contract with you (to set up your subscription; to provide the software to you).</p>

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
	appropriate third party payment provider.	
Internet Protocol (IP) address	We'll collect this automatically when you use our software, to help us to identify and prevent malicious activity on your user account.	Performance of a contract with you (to keep your user account secure in line with our commitment to data security and data privacy).
Device type (e.g. Mac device, Windows device) Operating system type (e.g. iOS, Android) Browser type (e.g. Chrome, Edge)	<ol style="list-style-type: none"> We'll automatically collect information about the number of devices, types of devices, and the operating system on those devices, to help us deliver the best user experience to you. When you need technical support from us, understanding what kind of device, operating system and browser you're using helps us to 	Necessary for our legitimate interests (to help us to troubleshoot queries and issues effectively; to improve our customer support experience; to improve our products and services; to develop our business).

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
	troubleshoot issues effectively.	
<p>Any personal data captured in your Glean user account content. Content means any audio recordings, transcribed audio recordings, digital notes, slides, PDF files, images, and text).</p>	<ol style="list-style-type: none">1. We'll collect, process, and store this data as you use our software as part of the service that we provide to you.2. We'll also use this data to maintain and improve our software and the service we provide to you by:<ul style="list-style-type: none">• performing debugging or other urgent technical work to identify and repair errors that impact intended functionality or your user account security	<ol style="list-style-type: none">1. Performance of a contract with you (to provide the software to you).2. Necessary for our legitimate interests (to improve our software; to enable us to carry out research and development on our software products and services; to protect against security threats and illegal activity; to understand how users interact with our software; to improve user experience).

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
	<ul style="list-style-type: none">• performing quality assurance checks and technical research and development using randomised samples of your transcribed content• performing abuse monitoring and security and error logging to maintain or improve the safety and security of our software• evaluating improvements to our software for the purposes of product research and development• evaluating potential new features or capabilities in our software for the purposes of product research and development	



<p>Personal Data collected</p>	<p>How and why we collect this</p>	<p>Lawful basis for processing including basis of legitimate interest</p>
<p>Usage data:</p> <p>Your sign-up status (invited, signed up, invite expired)</p> <p>and</p> <p>Your activity in-app:</p> <ul style="list-style-type: none"> • how many hours/days/months ago you were last active in the software • the number of pieces of content created • the number of audio recordings made • the number of audio recordings transcribed • the names of features / buttons / Glean website 	<p>We'll collect this data from you automatically when you use the software so that we can better understand how you interact with our software, which features and aspects are popular and which aren't and how long you use our software for in a typical session.</p> <p>We'll also use this data to track the performance of our software, including how long pages take to load in our app, as well as how quickly our software responds to your actions.</p> <p>We'll also use this data in a situation where you</p>	<p>Necessary for our legitimate interests (to better understand our users; to improve user experience; to develop and improve our products and services; to grow our business).</p>

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
<p>pages clicked on and how many times</p> <ul style="list-style-type: none">• how long you've been logged in and stay in the software• how many times you launch the software• your mouse movement and clicks in the app	<p>need to provide you with technical support. For example, if you encounter an error in-app we'll track your mouse movements and clicks to help us to understand your issue, including recreating the issue, to help us resolve it.</p>	
Where you agree to participate in a user survey, competition,	Where you participate in this kind of activity, we'll first seek your	1. You have given consent (you agree to share personal information with us).

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
<p>feedback session, feature trial, case study or testimonial:</p> <p>Name</p> <p>Email address</p> <p>Organisation name</p> <p>Your responses / feedback (this could be in the form of an online survey form, telephone call, web call or video call, or video footage that you record and share with us).</p>	<p>consent to collect the data and we'll also let you know what the purpose of collecting the data is at that time.</p>	<p>2. Also necessary for our legitimate interests (to better understand our users and build relationships with our users; to improve user experience; to develop and improve our products and services; to grow our business; to inform our marketing efforts).</p>

Cookies and similar technologies

How we use cookies

We use cookies and similar technologies to help understand how you use our website and software, to remember your website / app preferences, for user authentication, to manage and track how effective our marketing efforts are, and to provide you with

targeted advertising. We might also include tracking pixels, which are small graphic images, in our emails, to help us understand if our messages were opened and if any links were clicked. In some cases, as we mention below, third parties may also get the opportunity to set cookies and similar technologies.

Types of cookies we use

Performance, Analytics, Marketing

To help us understand how our website and software is being accessed, used, and how it's performing. We also use this data to maintain, operate, and continually improve our website.

Functional

These cookies let us operate our website and software in line with the choices you make. These cookies mean that when you continue to use or return to our website and software, we can provide you with an experience that matches your chosen preferences - such as remembering your login email address for a quicker login experience, and remembering any customisation you've made (e.g. that you turned on dark mode).

Third parties and Targeted Advertising

We allow trusted third parties to use cookies on or outside our website for the same purposes described in this section. We may also use service providers acting on our behalf to use cookies for the purposes described in this section, and to provide targeted advertising. This means cookies and related technologies are used to serve you targeted ads after you've visited or interacted with our website (for example, you might see an advert for Glean's software when you're using Facebook because you agreed to our use of marketing cookies).

We don't serve targeted social adverts to people under the age of 18. This means that when we set up a retargeting advertising campaign on the Facebook platform for example, we only send the advert to people over the age of 18. We use the age settings that Facebook (Meta) provides to achieve this.

Managing your cookie preferences

You can update your cookie preferences at any time by visiting <https://glean.co/cookies>. On this page you'll see a full list of the cookies and related technologies that we use, who the provider is (where it's a third party provider), the purpose of using that specific cookie, when the cookie expires, and the type of cookie that it is e.g. HTTP cookie. This list is automatically refreshed on a monthly basis, so if we add a new type of cookie or remove a cookie, the list will update.

We need to let you know that if you refuse or disable certain types of cookies, some parts of the Glean website may become inaccessible or don't work properly.

Do Not Track

Glean uses [Cookiebot](#) to manage cookie consent. Cookiebot will honour Do Not Track preferences. For more information about Do Not Track, please visit <https://allaboutdnt.com/>.

Sensitive personal data collection (Special Category Data)

Depending on how you interact with us, there may be times where you provide us with more sensitive personal data (also called special category data). You can learn more about special category data on the ICO's website [here](#). Examples of situations where we

may collect this kind of data include; when you provide us with feedback or complete one of our surveys.

The UK GDPR requires us to have an article 6 lawful basis for processing your special category data (these are described in the tables above) *and* one of the conditions set out in article 9. Where Glean knows that an interaction between us will result in the sharing of special category data, the article 9 condition that we rely on is: **explicit consent**. This means that we'll always ask for your consent to process your special category personal data when we make a survey or feedback form available to you.

You can withdraw your consent at any time, by contacting legal@glean.co.

Opting out of marketing communications

You can ask us to stop sending you marketing emails at any time by following the unsubscribe link at the bottom of our email or by contacting us. This means that we'll stop using your personal data for marketing purposes.

However, we may still need to process your personal data for other purposes, for example, to provide you with our software, or to send you emails about important updates to our terms and conditions.

Change of purpose

We'll only use your personal data for the purposes we collected it for in the first place. In rare cases, we might use it for another reason that's consistent with the original purpose. If we need to use your personal data for an unrelated purpose, we'll contact you

first and explain the reason why and the legal basis which allows us to do this. There are specific circumstances where we may process your personal data without your knowledge or consent where we have to, or, where it's allowed by law. For example, in a situation where we'd need to cooperate with law enforcement.

Does Glean share personal data?

We'll start by saying that at Glean, we truly respect your privacy and would never sell or rent your personal data. There are instances when we'll need to share your personal data with other parties (and then only the minimum amount necessary to do what we need to do). We'll describe these here:

- Sharing within our own business, which means our UK parent company and US subsidiary company. This sharing will be for the purposes set out in this Privacy Notice relating to our role as Data Controller, or, to provide a service as a Data Processor (for example, our US company may handle the payment procedure for a US-based individual).
- Sharing with third-party service providers that process personal data on our behalf (our Data Processors). We use carefully-chosen third party providers for their expertise in particular areas, such as: processing payments, hosting services (cloud storage), customer relationship management, assisting with user feedback, product transcription services, and others. You can request an up-to-date list of all our Third Party Data Processors by emailing legal@glean.co.
- Where you've purchased a subscription to our software from one of our resellers, we may need to share limited personal data with the reseller to make sure that payment, providing

access to the software, and delivery of the software to you has been done accurately and successfully.

- Where you use our in-app feature [Send A Copy](#), the person you send a copy to will see your email address, name, and will receive the content you share.
- Where your access to the software is provided by your organisation, we'll share the the following individual **usage data** with your organisation:
 - Sign-up status (Invited / Invite Expired / Invite Withdrawn / Signed up / Expired)
 - Status history (for example, the date you accepted the invite to create your Glean user account)
 - Last active (how long ago you last created or edited content in Glean).

This data sharing forms part of our agreement with your organisation.

- Where your access to the software is provided by your organisation, and your organisation is participating in a whole organisation trial (also called a sitewide pilot), we'll share the following individual **usage data** with your organisation:
 - Sign-up status (Invited / Invite Expired / Invite Withdrawn / Signed up / Expired)
 - Status history (for example, the date you accepted the invite to create your Glean user account)
 - Last active (how long ago you last created or edited content in Glean)
 - Frequency of use in days (the number of days you've accessed Glean in the past week or month etc)

- Number of pieces of content created, including number of audio recordings made and transcribed
- The names of features, buttons and Glean website pages you've clicked on and how many times.

This data sharing forms part of our agreement with your organisation relating to the trial, and helps them to measure how successful the trial is.

- Sharing in the event of a merger, sale, acquisition, or reorganisation of all or parts of our business, data covered by this Privacy Notice may be transferred in connection with that business event.
- Sharing in the event we need to respond to a legal request for your information. We'll only ever share your data with law enforcement or other government bodies where it's required to comply with a warrant, court order, subpoena, or other lawful government requests. We'll contact if this has taken place.
- In rare cases, sharing data is necessary to investigate or take action relating to illegal activities, or, where people, our property, or the systems we use to provide our software and services to you have been harmed.

International data transfers

As a software company that provides services globally, we may transfer, store and process your personal data with third-party service providers based outside of the country in which you're based. Laws in those countries might be different from the laws of the country where you live. Where we transfer, store and process your personal data outside of the UK or EEA, we'll make sure that

the appropriate safeguard is in place to protect your personal data. These safeguards include:

- Where appropriate, we'll work with third party providers that are UK or EEA based, or, which are deemed to provide an adequate level of protection for personal data by the European Commission and UK Information Commissioner's Office (ICO).
- Where we need to work with providers based outside of the UK, EEA or other approved adequacy country, we'll make sure that we have a Data Processing Agreement in place with the third party provider. The Data Processing Agreement will also need to include the appropriate data transfer mechanism, like the Standard Contractual Clauses (SCCs).

Please reach out to us if you'd like further information on the specific mechanism used by us when transferring your personal data outside of the UK or EEA.

Data security

Glean is committed to safeguarding the confidentiality, integrity and availability of your personal data. This is why we have put in place physical, administrative, contractual, and technical measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered, or disclosed when it shouldn't be. We limit access to your personal data to those employees, agents, contractors and other approved third parties who have a business need to know. They will only process your personal data on our instructions and are subject to a duty of confidentiality.

We've also put in place procedures to deal with any suspected

personal data breach or security incident that may compromise the safety of your personal data, and we'll notify you and any applicable regulatory body of a breach where we're legally required to do so.

We do need to let you know that unfortunately, the transfer of personal data through the internet carries its own risks and we can't guarantee the security of your data transmitted through the internet - if you do this, it's at your own risk.

Our website, software and services may provide links to websites and services provided by third parties. Any information you provide on apps, third-party websites or services is provided directly to the operators of those websites or services, and is subject to their policies governing privacy and security, even if accessed via our website or in connection with our services.

To learn more about our robust approach to data security, please read our handy [Data Security web page](#).

How long Glean keeps personal data for

We'll only keep your personal data for as long as we need to, to fulfil the purposes we collected it for. This includes for the purposes of meeting any legal, accounting, or reporting requirements.

To help us to decide the appropriate retention period for personal data, we consider:

- the quantity, nature, and sensitivity of the personal data
- the potential risk of harm from unauthorised use or sharing of your personal data

- the purposes for which we process your personal data and whether we can achieve those purposes through other means
- any applicable legal requirements

In some circumstances we may completely **anonymise** your personal data (so that it can no longer be linked to you) for research or statistical purposes, or to help us to keep improving our software products and services. In these cases, we may use this data indefinitely without having to keep communicating with you about it.

Details of our retention periods for your personal data are available in our retention policy, which you can request by reaching out to us. For information about the offboarding and deletion process that your Glean user account goes through when your Glean subscription ends, or your access expires, visit [here](#).

Your privacy rights

You have the following rights in relation to your personal data that we hold:

- **Access.** You have the right to access the personal data we hold about you, and to receive an explanation of how we use it and who we share it with.
- **Correction.** You have the right to correct any personal data we hold about you that is inaccurate or incomplete.
- **Erasure.** You have the right to request for your personal data to be erased or deleted (also known as the Right to be Forgotten).
- **Object to processing.** You have the right to object to our processing of your personal data where we're relying on a legitimate interest or if we're processing your personal data for direct marketing purposes.

- **Restrict processing.** You have a right in certain circumstances to stop us from processing your personal data other than for storage purposes.
- **Portability.** You have the right to receive (in a structured, commonly used and machine-readable format) personal data that you have provided to us if we process it on the basis of our contract with you, or with your consent, or to request that we transfer this personal data to a third party.
- **Withdraw consent.** You have the right to withdraw any consent you previously gave us. We'll update your preferences for future, and this won't affect the lawfulness of processing before you gave consent.

No fee is usually required - in most cases you won't have to pay a fee for exercising your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we might refuse to carry out your request in these circumstances.

What we might need from you - We'll usually need to request specific information from you to help us confirm your identity and make sure you have the right to make the request in the first place. This is a security measure to make sure that personal data is not shared with someone who has no right to receive it. We may also contact you to ask you for further information in relation to your request to help speed up our response.

Time limit to respond - We'll aim to respond to all legitimate requests within one calendar month. Occasionally, it may take us longer than a month if your request is particularly complex or you've made several requests. In this case, we'll let you know and keep you updated.



To exercise your rights, or for more information about your rights, please reach out to us at legal@glean.co.

Additional information for California residents

This section applies only to California consumers. For purposes of this section "Personal Information" has the meaning given in the California Consumer Privacy Act ("CCPA"). It describes how we collect, use, and share California consumers' Personal Information in our role as a business.

How We Collect, Use, and Disclose your Personal Information

We have collected the following statutory categories of Personal Information in the past twelve (12) months:

- Identifiers, such as name, e-mail address, user ID, and phone number. We collect this information directly from you.
- Commercial information, such as subscription records. We collect this information directly from you.
- Geolocation data, such as IP address. We collect this information from your device.
- Financial information, such as Payment Information or financial account numbers in the process of providing you with a subscription. We collect this information from you.
- Professional data, such as your job title and company.
- Other Personal Data, in instances when you interact with us online, by phone or mail in the context of receiving help through our help desks or other support channels; participation in customer surveys or contests; or in providing our software products and services to you.

- Inferences drawn from any of the above categories, alone or in combination.

The business and commercial purposes for collecting this information from you are described in this Privacy Notice. The categories of third parties that we "disclose" this information for a business purpose are described in the "Does Glean share personal data?" section of this Privacy Notice.

💡 Under the CCPA, "sharing" is defined as the targeting of advertising to a consumer based on that consumer's personal information obtained from the consumer's activity across websites, and "selling" is defined as the disclosure of personal information to third parties in exchange for monetary or other valuable consideration. This means that our use of third-party online advertising services, which are described in the "Cookies and similar technologies" section of this Privacy Notice, may result in the disclosure of online identifiers (e.g., cookie data, IP addresses, device identifiers, and usage information) in a way that may be considered a "sale" or "sharing" under the CCPA.

The period of time for which we keep personal information is described in the "How long does Glean keep personal data for" section of this Privacy Notice.



Contact and complaints

To talk to us about this Privacy Notice or to make a complaint, please first contact us at legal@glean.co and we'll do our very best to deal with your query as soon as possible.

If you're based in the UK, you may also make a complaint to the UK's ICO (on +44 303 123 1113 or via <https://ico.org.uk/make-a->

[complaint/](#)), or to the supervisory authority where you're located.



This Privacy Notice was last updated on 11 October 2024



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