



# Glean Privacy Notice

**Building trust through transparent data privacy practices**

## Introduction

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, this page is for you. Here we explain how and why we use your personal data, and what your privacy rights are.

Have feedback or questions about this Privacy Notice? Reach out to us at [legal@glean.co](mailto:legal@glean.co).

If you're applying for a job at Glean, we have a separate Applicant Privacy Notice here.

## Changes to this Privacy Notice



Although significant 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, where required, we'll seek 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 and download previous versions, [here](#).

## ? Who is 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 individuals and organisations across the world. You can learn more about what we do [here](#).

Glean 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

Our trading name is Glean. You can find full contact information for our offices [here](#).

## 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 with respect to processing personal data. The UK GDPR is one of the most comprehensive privacy regulations in the world

currently. You can learn more about it [here](#). However, 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 from London or Chicago, 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 for the processing

## What is Personal Data?

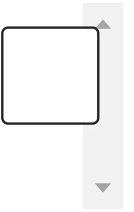
Any information that can be used to identify you, whether directly or indirectly. Some examples include: name, email address, Internet Protocol (IP) address, telephone number.

## 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 the processing 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.

## 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 cookies preferences, sending us a message using our contact form, downloading our [security\\_page](#) resources
- 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 to us 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 lawful basis for doing so (sometimes there's more than one lawful 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 (e.g. tied 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 site you've clicked on or looked at)</p>	<p>We'll collect this data through our use of cookies and similar technologies. You can customise your cookies preferences. 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>
<p>First name and last name</p>	<p>1. If you contact us using our website contact forms, we'll collect this data so</p>	

Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest <input type="checkbox"/>
<p>Email address</p> <p>College/University name (optional)</p>	<p>that we can reply to your message appropriately.</p> <p>2. Where we've collected your email address, we'll use it to let you know about important updates to this Privacy Notice.</p> <p>3. We may also use your email address to send you marketing communications (by email) about our events, products, and services.</p>	<p>1. You have given consent (you've contacted us and expect a reply).</p> <p>2. Necessary to comply with a legal obligation (by law we need to let you know about legal changes to this Privacy Notice).</p> <p>3. Necessary for our legitimate interests (to grow our business; to inform our marketing efforts).</p>
<p><i>When you become a member of our <u><a href="#">Notetaking Support Network (NTSN)</a></u>:</i></p> <p> Name</p>	<p>1. When you become a member of the network, we'll collect this data from you so that we can better understand why you joined our network and how you</p>	<p>Necessary for our legitimate interests (to better understand our market, to grow our network;</p>

Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
<p>Email address</p> <p>Name of your institution (new member question)</p> <p>Job title (new member question)</p> <p>How you heard about the NTSN (new member question)</p> <p>Confirmation of whether you want more information about our products and services (new member question)</p> <p>Any other information you choose to share with us on the network</p>	<p>found our network, and how our products and services might be able to help you.</p> <p>2. Depending on your responses to the new member questions we ask you, we may also use this data to send you email marketing communications about our products and services.</p>	<p>business; to inform our marketing efforts).</p>
<p>Internet Protocol (IP) data:</p> 	<p>We'll collect this data automatically when you visit our website so</p>	<p>Necessary for our legitimate interests (we</p>





Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
IP city IP country IP country code IP state/region time zone.	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.	use analytics to measure the success of our website, to improve our website; to improve visitor experience; to inform our marketing efforts).
Geolocation (the specific geographic area from which your device is interacting with us)	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.	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).
<i>Technical data:</i>  Device type (e.g. desktop, mobile)	Where you contact us using the <i>Contact Us</i> form on our <a href="#">Help Center page</a> or, the <i>Need</i>	Necessary for our legitimate interests (to help us to

Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
<p>Operating system type (e.g. Windows, iOS, Android)</p> <p>Browser type and version (e.g. Chrome, Edge)</p>	<p><i>Help</i> form on the <a href="#">Sign In page</a>, we'll collect this data automatically. 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>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 <i>Contact Us</i> form on our <a href="#">Help Center page</a> or, the <i>Need Help</i> form on the <a href="#">Sign In page</a>, we'll collect this data automatically. 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. Also necessary for our legitimate interests (to run our events; to grow our business; to inform

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>	<p>our marketing efforts).</p>

Personal Data collected	How and why would this be collected?	Lawful basis, including basis of legitimate interest
<p><i>Other information, depending on the specific event. This could include but isn't limited to:</i></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 <b>surveys</b> you participate in</p>	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> </ol>	<ol style="list-style-type: none"> <li>1. You have given consent (you agree to share personal information with us).</li> <li>2. Also 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).</li> </ol>

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 and agree to us taking a note of	3. Where you complete a survey, we'll first seek your consent to collect the data and we'll also let you know what 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 (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	1. We'll ask you to provide this data during the account set-	1. Performance of a contract with you (to create your user account; to provide the software to

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
<p>Unique user ID</p> <p>Authentication data (we need to remember that you're logged in to our software so that you don't lose your session)</p>	<p>up process so that we can create your Glean user account. This includes if you sign up using <u>Single Sign On</u>.</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"> <li>• letting you know about company news and what we've been up to (marketing and promotional communications)</li> <li>• letting you know about new products, features and web content we've published (marketing and</li> </ul>	<p>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 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</p>

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
	<p>promotional communications)</p> <ul style="list-style-type: none"><li>• letting you know about upcoming Glean events (marketing and promotional communications)</li><li>• inviting you to take part in a survey, competition, feedback session, or beta trial of a new feature (marketing and promotional communications)</li><li>• letting you know about important changes to your user account and access to the software, e.g. security update, planned maintenance (transactional communications)</li></ul>	<p>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"><li>• fulfilling a request relating to your user account e.g. sending a reset password link (transactional communications)</li><li>• responding to your request for customer support (transactional communications)</li><li>• letting you know about important changes to our legal agreement with you, including this Privacy Notice (transactional communications)</li></ul>	
Billing address City ZIP/ Postcode (optional) Region (optional)	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	Performance of a contract with you (to set up your subscription; to provide the software to you).

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
Country	set up your paid subscription.	
Geolocation (the specific geographic area from which your device is interacting with us).	<ol style="list-style-type: none"><li>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.</li><li>2. If you purchase a subscription, we'll use your geolocation to direct you to the appropriate third party payment provider.</li></ol>	Performance of a contract with you (to set up your subscription; to provide the software to you).

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
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"><li>1. 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.</li><li>2. When you need technical support from us, understanding what kind of device, operating system and browser you're</li></ol>	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
	using helps us to troubleshoot issues effectively.	
Your content that you capture in the Glean software such as audio recordings, transcribed audio recordings and digital notes (these notes may include PowerPoint slides, PDF files, images, text).	<ol style="list-style-type: none"><li>1. We'll collect, process, and store this data as you use our software as part of the service that we provide to you.</li><li>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"><li>• performing debugging or other urgent technical work to identify and</li></ul></li></ol>	<ol style="list-style-type: none"><li>1. Performance of a contract with you (to provide the software to you).</li><li>2. Necessary for our legitimate interests (to improve our software; to protect against security threats and illegal activity; to understand how users interact with our software; to improve user experience).</li></ol>

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
	<p>repair errors that impact intended functionality or your user account security</p> <ul style="list-style-type: none"><li>• performing quality assurance checks and technical research and development using randomised samples of your transcribed content</li><li>• performing abuse monitoring and security and error logging to maintain or enhance the safety and security of our software</li></ul>	

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
<p><i>Usage data:</i></p> <p>Your sign-up status (invited, signed up, invite expired)</p> <p>Your activity in-app</p> <ul style="list-style-type: none"> <li>• how many hours/days/months ago you were last active in the software</li> <li>• the number of pieces of content created</li> <li>• the number of audio recordings made</li> <li>• the number of audio recordings transcribed</li> <li>• the names of features / buttons / Glean website pages clicked on and how many times</li> </ul>	<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 of our software are popular and which aren't, how our software is performing overall, and how long you use our software for in a typical session. We'll also use this data in a situation where we need to provide you with technical support.</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>

<p>Personal Data collected</p>	<p>How and why we collect this</p>	<p>Lawful basis for processing including basis of legitimate interest</p>
<ul style="list-style-type: none"> <li>• how long you've been logged in and stay in the software</li> <li>• how many times you launch the software</li> </ul>		
<p><i>Where you agree to participate in a user survey, competition, feedback session, feature trial, case study or testimonial:</i></p> <p>Name</p> <p>Email address</p> <p>Your responses / feedback (this could be in the form of an online survey form, telephone call, web call or video call, or</p>	<p>Where you participate in this kind of activity, we'll first seek your consent to collect the data and we'll also let you know what the purpose of collecting the data is at that time.</p>	<ol style="list-style-type: none"> <li>1. You have given consent (you agree to share personal information with us).</li> <li>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</li> </ol>

Personal Data collected	How and why we collect this	Lawful basis for processing including basis of legitimate interest
video footage that you record and share with us).		services; to grow our business; to inform our marketing efforts).

## 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 identified above. 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 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/>.

## Personal Data Glean doesn't collect

Glean will never ask you to provide any **Special Category Data**, which means sensitive information about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, gender identity, political opinions, trade union membership, health, genetic, or, biometric data. Glean will also never ask you for any information about criminal convictions and offences. Where we discover that we have unknowingly collected sensitive information from you (for example, you've shared something on a feedback form), we'll take steps to delete this data from our database.

We think it's also worth saying that you don't have to provide us with any personal data that we may request from you. While we can understand this, it does also mean that we probably won't be able to fulfil your request - we're sorry about that.

# 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.

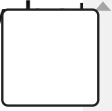
## Change of purpose

We'll only use your personal data for the purposes we collected it for in the first place. In rare cases, we may 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 this is required or permitted by law. For example, in a situation where we'd need to cooperate with law enforcement.

## Does Glean share my 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 includes 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 user).
- Sharing with third-party service providers that process personal data on our behalf (our Data Processors). You can read an up-to-date list of our current [Third Party Data Processors](#) in the section below.
- 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.

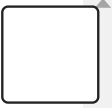


- Where your access to the software is provided by your organisation, and your organisation is participating in a whole organisation trial (also called a sitewide pilot), we'll share the following individual **usage data** with your organisation:
  - Sign-up status (Invited / Invite Expired / Invite 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 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](#).

## Data retention



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](mailto:legal@glean.co).

## **Third Party Processors List**

In order to provide our website and software products and services to you, Glean engages carefully chosen third-party service providers. These service providers act as our Data Processors, so we call them 'Third Party Processors'. If we make a change to our Third Party Processors, for example, if we decide to engage a new provider, we'll let you know first and explain the reason why we're doing this.

Name	Location	Purpose/Services
Google LLC	United Kingdom	Cloud hosting services, database hosting, data centre services, email services, analytics, advertising, user <b>survey</b> tool, workplace collaboration tools, online meeting and video calling services
Amazon Web Services (AWS)	United Kingdom	Cloud hosting services, database hosting, data centre services, email services
Elasticsearch, Inc	United States	Platform logging tool
Help Scout PBC	United States	Customer support help desk and knowledge base
PandaDoc Inc.	United States	Contract administration and signature tool
Microsoft Corporation	United States	Business administration, delivery, support, and related services, online meeting and video calling services
Microsoft Azure	United Kingdom	Hosting provider
Pendo.io, Inc.	United States	Analytics, end user onboarding
Tableau Software, LLC	United States	Data visualisation and reporting

Name	Location	Purpose/Services
Juro Online Limited	United Kingdom	Contract administration and signature tool
Chargebee Inc.	United States	Customer subscription management platform
Slack Technologies, LLC	United States	Workplace communications platform
HubSpot, Inc	United States	Customer relationship management including inbound marketing and sales, website hosting services, email services
Usercentrics A/S (Cookiebot)	Denmark	Cookie consent management tool
Stripe, Inc.	United States	Payment processing
Resolvity Inc. (VoiceGain)	United States	In-product transcription services
Deepgram Inc.	United States	In-product transcription services
Sendinblue SAS (Brevo)	France	Email services
Atlassian Corporation Plc -	United States	Workplace collaboration tools including support ticket management

Name	Location	Purpose/Services
<i>Jira, Confluence, Trello</i>		
Productboard, Inc.	United States	User feedback management tool
Zapier Inc	United States	Workflow automation tool
Bright Market, LLC (FastSpring)	United States	Payment processing
Concept Den Limited (SendOwl)	United Kingdom	Payment processing
Functional Software, Inc. (Sentry)	United States	Application monitoring/error tracking
Zoom Video Communications, Inc.	United States	Online meeting and video calling services
Marvel Prototyping Ltd (Ballpark)	United Kingdom	Online user-testing and research services
<ul style="list-style-type: none"> <li>Professional advisers acting as</li> </ul>	-	-



Name	Location	Purpose/Services
<p>processors including lawyers, bankers, auditors and insurers based United States of America who provide consultancy, banking, legal, insurance and accounting services.</p> <ul style="list-style-type: none"><li>• HM Revenue &amp; Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require</li></ul>		

Name	Location	Purpose/Services
reporting of processing activities in certain circumstances.		



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[Privacy Notice](#)

[Service Agreement](#)

[Accessibility Statement](#)

[Data Security](#)

[Third Party Licenses](#)



Cookie Preferences



The Glean logo consists of a black circular icon with a white dot inside, followed by the word "Glean" in a bold, sans-serif font.

