

# Privacy Policy

Welcome to the Sonocent privacy policy for the Glean website and Glean web application.



## Introduction

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

Sonocent respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you use our website and software and tells you about your privacy rights and how the law protects you.

### **Purpose of this privacy notice**

This privacy notice provides you with information on how the Glean website and Glean web application collect and process your personal data through your use of them.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **Controller**

The Glean website and Glean web application are created and owned by Sonocent Ltd. Sonocent is made up of different legal entities, details of which can be found in the glossary. This privacy notice is issued on behalf of the group of companies; so when we mention Sonocent, "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Sonocent group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. Sonocent Ltd is licensor of all Sonocent software and therefore is the controller responsible for all personal data related to usage of the software.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### **Contact details**

Our full details are:

Company Name: Sonocent Ltd

Name of DPO: David Sankey, Director

Email address: [legal@glean.co](mailto:legal@glean.co)

Postal address:

4 The Boulevard, Leeds Dock, Leeds, West Yorkshire, LS10 1PZ, United Kingdom.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes This version was last updated on 31 January 2022.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

**Identity Data** includes first name, last name, username or similar identifier.

**Contact Data** includes billing address, delivery address, email address and telephone numbers.

**Technical Data** includes internet protocol (IP) address, license key, computer system details, operating system and platform.

**Usage Data** includes information about how you use our website or software.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data where we need to collect personal data under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have, or, are trying to enter into with you (for example, accessing the software). In this case, we may have to cancel your use of our services and we will notify you if this is the case.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

#### **Direct interactions**

You may give us your Identity and Contact data through forms by or by corresponding with us by phone email or otherwise. This includes personal data you provide when you:

- Create an account

- Give us feedback
- Request marketing communications to be sent to you
- Enter a promotion or survey

### **Automated technologies or interactions**

As you interact with our software, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please refer to section 5 for our Cookie and Pixel policy.

## **4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we have gathered consent to do so.
- Where we need to perform the contract, we are about to enter into or have entered into with you. (e.g. registration details so we can ensure your account is protected).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- You have the right to withdraw consent to marketing at any time by contacting us.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data as part of using our website and software, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Product registration	Identity, Contact, Marketing and Communications	Performance of a contract with you. Necessary to comply with a legal obligation. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy Asking you to leave a review or take a survey	Identity, Contact, Marketing and Communications.	Performance of a contract with you Necessary to comply with a legal obligation Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and the software (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity, Contact, Technical	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation
To deliver relevant new content through the	Identity Contact,	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
news pane to you and measure or understand the effectiveness of the advertising we serve to you	Usage, Marketing and Communications, Technical	
To use data analytics to improve our website, software, products/services, marketing, customer relationships and experiences	Technical Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our software updated, to develop our business and to inform our marketing strategy)
To provide our in-app transcription service	Audio content generated by end user	Necessary in delivering the product features and therefore performance of a contract with you
To store and provide availability of recording and relevant metadata for delivery of the product	Identity, Contact, Usage, Technical	Necessary in delivering the product features and therefore performance of a contract with you



## **Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of activating or registering the software that are necessary for performing our contract with you.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

# **5. Cookie and Pixel Policy**

## **What are cookies and tracking pixels and what do they do?**

Part of the personal data we collect is done so via cookies and tracking pixels, which are in part placed by third parties. Cookies and tracking pixels are small pieces of information that are placed on your computer when you visit certain websites. They collect or receive specific types of information and use this information to improve your experience and provide targeted advertisements. We use different types of cookies and pixels on the Glean website and Glean web application.

## How we use cookies

We use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your device for a set period of time until you delete them). We use the following types of cookies for the purposes explained in this chart:

Cookie Type	Purpose	Duration
Essential, Operational	These cookies are necessary to allow us to operate Glean as you have requested. For example, they allow us to recognise what type of visitor or user you are, and then provide you with services accordingly.	12 months
Performance, Analytics, Marketing	We use these cookies to analyse how the Glean App is accessed, used, or is performing. We use this information to maintain, operate and continually improve Glean. We may also obtain information from our marketing email correspondence with you, including whether you opened or forwarded an email or click on any of its content.	12 months
Functional	These cookies let us operate certain functions of the Glean App in line with the choices you make. These cookies mean that when you continue to use or return to the Glean App, we can provide you with our services as you have asked for them to be provided, such as knowing your username and remembering how you have customised our services.	12 months
Third Party	We allow the below trusted third parties to use cookies on or outside the Glean Website and Glean Web App	Duration varies (decided by Third Party) 1. Google Analytics Cookie

Cookie Type	Purpose	Duration
	for the same purposes identified above, including collecting information about your online activities over time and across different websites. We may also use service providers acting on our behalf to use cookies for the purpose described above. 1. Google Analytics 2. Amplitude Analytics 3. HelpScout 4. WorkBox 5. Vimeo	Policy: <a href="https://policies.google.com/technologies/types?hl=en-US">https://policies.google.com/technologies/types?hl=en-US</a> 2. Amplitude Analytics Cookie Policy: <a href="https://amplitude.com/privacy#cookies">https://amplitude.com/privacy#cookies</a> 3. HelpScout Cookie Policy: <a href="https://www.helpscout.com/company/legal/cookie-policy/">https://www.helpscout.com/company/legal/cookie-policy/</a> 4. Workbox (made by Google) Cookie Policy: <a href="https://policies.google.com/technologies/types?hl=en-US">https://policies.google.com/technologies/types?hl=en-US</a> 5. Vimeo Cookie Policy: <a href="https://vimeo.com/cookie_policy">https://vimeo.com/cookie_policy</a>

## Managing cookies

You can delete cookies stored on your computer and / or change your cookie settings at any time through your browser settings. For more information, please refer to the following links:

[Internet Explorer](#)

[Microsoft Edge](#)

[Google Chrome](#)

[Mozilla Firefox](#)

[Safari](#)

If you disable or refuse cookies, please note that some parts of the Glean website and Glean web application may become inaccessible or not function properly.

For information about how long data collected via third party cookies is retained, please see the privacy statement of the relevant third parties linked above.

### Tracking pixels and how we use them

We and third parties make use of the following tracking pixels when you visit the Glean website or Glean web application:

Pixel	Purpose	Privacy Policy	Opt Out
Google Adwords remarketing tag	<ul style="list-style-type: none"> <li>• To track page views</li> <li>• To track conversion</li> <li>• To add visitors to specific remarketing groups (to show them more relevant content)</li> <li>• To obtain statistics about the use of our websites and Glean App</li> </ul>	<a href="https://policies.google.com/privacy?hl=en-US">https://policies.google.com/privacy?hl=en-US</a>	<a href="https://adssettings.google.com/authenticated?hl=en#display_optout">https://adssettings.google.com/authenticated?hl=en#display_optout</a>
Facebook pixel	<ul style="list-style-type: none"> <li>• To track page views</li> <li>• To track conversion</li> <li>• To add visitors to specific remarketing groups (to show them more relevant content)</li> <li>• To obtain statistics about the use of our websites and Glean App</li> </ul>	<a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a>	<a href="https://adssettings.google.com/authenticated?hl=en#display_optout">https://adssettings.google.com/authenticated?hl=en#display_optout</a>
LinkedIn Pixel	<ul style="list-style-type: none"> <li>• To track page views</li> <li>• To track conversion</li> <li>• To add visitors to specific remarketing groups (to show them more relevant content)</li> <li>• To obtain statistics about the use of our websites and Glean App</li> </ul>	<a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>	<a href="https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out?cookie-policy">https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out?cookie-policy</a>

Pixel	Purpose	Privacy Policy	Opt Out
YouTube Pixel	<ul style="list-style-type: none"> <li>• To track page views</li> <li>• To track conversion</li> <li>• To add visitors to specific remarketing groups (to show them more relevant content)</li> <li>• To obtain statistics about the use of our websites and Glean App</li> </ul>	<a href="https://policies.google.com/privacy?hl=en-GB&amp;gl=uk">https://policies.google.com/privacy?hl=en-GB&amp;gl=uk</a>	<a href="https://adssettings.google.com/authenticated?hl=en#display_optout">https://adssettings.google.com/authenticated?hl=en#display_optout</a>

### What is remarketing?

Remarketing (also known as retargeting) means to serve targeted ads to people who have already visited or taken action on a website.

### Do Not Track

Sonocent makes use of the [Cookiebot](#) cookie and related technologies consent management tool. This tool will honour DNT preferences. For more information about Do Not Track, please visit <https://allaboutdnt.com/>.

## 6. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **7. International transfers**

We share your personal data within the Sonocent group. This will involve transferring your data outside the European Economic Area (EEA).

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules". For further details, see [European Commission: Binding corporate rules](#).

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **8. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

For further information, please refer to our [Customer Data Security Policy](#).

## **9. Data retention**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

## **10. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.



If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **11. Glossary**

### *Lawful Basis*

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise

required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### *Third Parties*

**Internal Third Parties** Other companies in the Sonocent group acting as joint controllers or processors and who are based in the United States of America and provide services.

### External Third Parties

- Service providers acting as processors based within the EU, United States of America and New Zealand who provide IT and system administration services.
- Service providers acting as processors based within the United States of America who provide in-product transcription services. These providers are: [VoiceGain](#), [Atexto](#) and [Rev](#).
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based United States of America who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

### *Your Legal Rights*

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Sonocent Group Sonocent is made up of two legal entities who process your personal data.

Sonocent Ltd trading as Glean (Company Number 06127874)

Sonocent, LLC (EIN: 47-5471149)

**Sonocent Ltd trading as Glean**, (06127874) is the parent company based in the UK and is license holder for all Sonocent products. Registered Address:

D1 Josephs Well, Hanover Walk, Leeds, West Yorkshire, LS3 1AB UK

Sonocent Ltd trading as Glean is owned by Sonocent Holdings Ltd (11304576) which does not process any customer personal data.

Sonocent LLC, is a subsidiary based in United States of America (USA) and acts as a reseller to the USA and Canada. Registered address:

4600 140th Ave North Suite 180 Clearwater, Florida 33762 USA

**Policy last updated 31 January 2022**