# GEARSET LIMITED PRIVACY POLICY

We respect your privacy. All personal data or personal information (referred to in this policy as "personal data") you give us is held with the utmost care and security.

This Privacy Policy (set out below and at <u>https://gearset.com/privacy</u>) sets out our privacy practices and tells you how your personal data will be treated by us. We do not sell, rent or loan any personal data to any third party. Only in the circumstances described within this Privacy Policy would we share your information with any third party.

If you are a California resident, please see California Residents: Your Rights.

Please take time to review this Privacy Policy. Any questions regarding this Privacy Policy should be directed to <u>privacy@gearset.com</u>.

## How we use your information

We are committed to protecting your privacy. This Privacy Policy sets out what data we collect, and how we use it - whether you're visiting our websites, using our products and services, working with any of our teams, meeting us at events or applying for a role with us. It also describes your rights regarding our use of your data.

## Visiting our websites

When you visit our websites, we collect standard internet log information and details of visitor behavior patterns, including through the use of third-party analytics services (such as Google Analytics). We collect this data, with your consent where required, to understand how people are using our websites, to manage their operation and to diagnose any problems.

We also use cookies to help us identify visitors to our websites to improve the way we offer our products and services. More information on how we use cookies is set out in the Cookies section below.

Our websites are not intended to be used by children under 16 years of age and we do not knowingly collect personal information from children.

## **Using Gearset**

#### **Account Creation**

When you create your Gearset account (or an account is created for you) we will collect information including your name, email address, company name and address. We collect this in order to maintain our relationship with you and to provide you with access to our services.

### **Using Gearset**

When you use Gearset (via app.gearset.com) we collect specific data from you:

• Service Data – We collect Service Data, which records certain 'in-product' actions and activities such as 'run a comparison', 'link a source control repository', and 'create change

monitor job'. This may include the login credentials or email address associated with the account you are logging in with, but does not include and is not derived from any of your Salesforce data.

- **Device Data** We collect information that your browser transmits to us about your computer, such as operating system, region, language, time zone, and browser version.
- Error reports If you experience problems with our services we may collect data about the services and any problems you experience with them. This data helps us improve our software and services, to diagnose problems in the services you use, and provide solutions. Depending on your account settings, error reports can include data such as the type or severity of the problem, details of the software or hardware related to an error, contents of files you were using when an error occurred and the current state of the software.

We use this information, because it is in our legitimate interests, to:

- measure how many people are using features within our services;
- measure the success of our sales, marketing and onboarding processes;
- guide product development decisions and improve our services;
- understand the environments in which our services are used (for example the browser used, screen resolution; and/or
- assist you in your evaluation, purchasing, and renewal of our services.

#### Signing in using Open Authorisation (OAuth)

You have the option of signing into Gearset using your Salesforce, Google or LinkedIn account, via the secure OAuth method. When you do this, we will have access to the following information from your linked account:

- Basic profile information
- Social login information

Of the information provided, we will only store your account ID (from your Salesforce, Google or LinkedIn account), name and email address. This information is used to administer the provision and management of your Gearset account. As we use OAuth, we will not have access to, or store, your linked account passwords. If you wish to remove the OAuth link between your Gearset and external accounts, you can do this at any point from within Salesforce, LinkedIn or Google.

#### **Pilots**

We may on occasion offer you the opportunity to preview certain features, functionality, technology or software products which are not yet made generally available to its customers except as part of a pilot program during which we collect feedback and usage data relating to your use of the pilot.

As a result, these releases may automatically collect additional data, provide fewer controls, and otherwise employ different privacy and security measures than those typically present in our products. If you participate in any pilots, we may contact you about your feedback or your interest in continuing to use the product after general release.

#### Third-parties and their sites

Some of our services, such as payment processing, support ticketing, and calendar scheduling are provided by or in conjunction with our (third-party) business providers. In such cases, we may need to share your personal data with them in order to provide these services. In this instance, please note that certain services may be unavailable if you do not want to disclose the personal data you are asked for.

Where our services make use of hosted tools, hosted data storage and payment services provided by third parties any of your personal data stored by such third parties shall be subject to their privacy provisions.

We will not sell any data regarding your use of our services, except as part of a reorganization or a sale of the assets of Gearset Limited, in which case we will ensure that your privacy continues to be protected.

## Sales, Support and Marketing

#### Connecting with our sales or support teams

If you engage with our sales or support teams (whether through our websites, by email, or through any other means), we may ask you to provide your name, email address, telephone number, company name and role because it is in our legitimate interests to collect this data to help us assist you. We may share this with our development teams to enable them to reproduce and fix product issues.

Gearset also includes live chat as a feedback and support mechanism. If you're signed in, we'll see your name and email address when you chat to us. Any information you send to us in the chat session will be shared with our product development and support teams.

### Events (in person and online)

When you attend one of our events or a third-party event we also attend (including virtual events via video conferencing providers such as Zoom), we may collect your name, email address, phone number, company name and role, and any other information that is relevant to event or its subject matter or which you provide to us when you speak to us. We collect this information because it's in our legitimate interests to promote our business, to know who's attending our events, and to be able to follow up with you, as appropriate.

#### Contacting us via social media

We maintain a presence on a number of social media platforms, including X (f.k.a. Twitter), Facebook, LinkedIn, and YouTube. We manage your interactions with us using Hootsuite as well as using social media platforms directly. If you send us a message via social media, we may include this in our CRM systems. We use your data in this way because it is in our legitimate interest to ensure we can properly respond to your query.

#### **Gated content**

We provide access to a lot of information through our websites. In order to provide you with access to some content, we may ask you to provide your name, email address, telephone number, company name and role because it is in our legitimate interests to collect this data to help us assist you.

#### Participation in Surveys, Promotions

If you choose to take part in any of our online surveys or promotions we may collect your name, address, email address, telephone number, company name and role, and any other information that is relevant to the survey or promotion. We will use this information under our legitimate interests to administer the promotion, help us to plan other promotions and improve the services we provide.

#### **Marketing communications**

We may use the personal data that you provide in order to send you additional information that we reasonably believe will be relevant to you based on the context in which we obtained the personal data (such as marketing information, product recommendations and other non-transactional communications), either because it is in our legitimate interests to use this data to provide you with direct marketing, or because you have provided your consent. You can unsubscribe from our marketing emails at any time, either through the link in the emails, or by emailing privacy@gearset.com. Please note that unsubscribing from marketing emails will not prevent you from receiving important business communications from us relating to our current relationship e.g. service emails, security announcements, and communications relating to your subscription(s).

## Recruitment

When we contact you in relation to roles you may be interested in or you apply for a job with us we may collect your name, contact details, recruitment information (e.g. right to work documentation and references), test results (inc. psychometric), qualifications, accreditations and any additional information we may receive from you or our recruitment partners.

We will use your personal data to assess your suitability for our available roles. We do this to perform our contract obligations or to take steps at your request, before entering into a contract. Where we process your right to work documentation, we will do so to comply with our legal obligations.

We record some recruitment calls/video calls for training and quality purposes to help us evaluate our performance. We rely on legitimate interests to record these calls. We'll let you know we're recording the call at the start and give you the option to opt-out of call recording.

## **Other Communications**

#### **Market Research**

From time to time we may carry out market research, either directly or through third party providers. If you participate in any market research, the information we gather may include your (i) name (ii) demographic data such as your educational background, job role, employment experience; (iii) contact data such as email address, home and/or work postal address, postcode, phone number; (iv) image and/or voice captured through photography, filming, videotaping and/or audio recording; and (v) other information you provide relating to your opinions, attitudes, experiences and use of certain products or services; and (vi) any other information which you provide in the course of our interactions with you.

We will use this information in our legitimate interests as part of our product research to inform how we develop existing and future products. We may also use the information to inform how we communicate with the market and to make changes to our internal processes.

#### **DevOps Launchpad**

When you create an account with DevOps Launchpad we will collect your name, Salesforce role (if applicable), company name, country of operation and email address. We collect this in order to maintain our relationship with you and to provide you with access to our services. The DevOps Launchpad is hosted on the Synap learning platform.

If you create an account on DevOps Launchpad through Gearset, we'll share your name and email address with Synap to create your DevOps Launchpad account. For more information on how Synap handle and process your data, see their Privacy Policy.

## Call/video recording

We record some calls (including video calls) for training and quality purposes to help us evaluate our performance and better understand the needs of our customers. In particular, to help us to better understand and improve how we work with our customers, we use a third party AI system to review our call recordings to provide us with insights for customer service development and quality assurance. For example, the system will help identify patterns or hightlight areas where our interactions with you can improve and how we can best enhance our service for you.

We rely on legitimate interests to record and review these calls. We'll let you know we're recording the call at the start and give you the option to opt-out on call.

## Cookies

Cookies are very small text files saved to your computer used to track user navigation around a website. We use session cookies when users visit our websites, to identify unique users to our websites and services. Depending on which of our websites you are visiting, we use slightly different cookies.

Users have the ability to accept or disable cookies by modifying the settings in their browser. Disabling cookies, however, may mean that some functionality may be affected. For further directions on how to disable cookies please visit the following website:

https://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html.

Some internet browsers have "Do Not Track" or "DNT" features which, when turned on, send a signal to the website that the individual visiting the website does not wish to be tracked. Our websites do not honor DNT signals, but you can set your browser settings to restrict the placement of cookies as described above.

#### **Essential Cookies**

We use essential cookies to distinguish you from other users of our websites. This helps us to provide you with a good experience when you use our websites. We are permitted to place these cookies without your prior consent, but you can block all cookies, including essential cookies by changing your browser settings. Please note if you block all cookies, you might not be able to use all parts of our websites.

#### **Non-Essential Cookies**

We use tracking cookies to track your movement within our websites, and your engagement with our other services such as blogs and email links. You'll receive this type of cookie when you visit one of our websites but the information it collects will remain anonymous until you share your email address with us through one of our websites. Where consent is legally required, we will only use (and store) non-essential cookies if you provide your consent.

More information on the specific cookies that we use can be found on each of our websites.

## **Other Information**

#### Disclosures

Other than the disclosures referred to in this policy, we will not disclose any personal data without your permission unless we are legally obliged or entitled to do so (for example, if required to do so by Court order or for the purposes of identifying fraud or other crime).

We will only disclose your personal data to a third party either as part of a reorganization or a sale of the assets of Gearset and/or having ensured that steps have been taken to ensure that your privacy rights continue to be protected.

#### **Retention period**

We may keep your personal data for as long as necessary to complete the original purpose for which we collected it, or for as long as necessary to fulfil our legal obligations.

#### Keeping our records accurate

We aim to keep our information about you as accurate as possible. If you would like to review or change the details you have supplied us with, please contact us as set out below.

# Transfers of your personal data outside of the United Kingdom and/or European Economic Area

Information you provide to us may be transferred by us to our service providers that are situated outside the United Kingdom and/or European Economic Area (EEA) and may be processed by staff operating outside these territories. Any of our servers may also be temporarily located in a country outside the UK/EEA. If we transfer your information outside the UK/EEA in this way, we will take steps to ensure that your privacy rights continue to be protected in accordance with UK and EU data protection law. To keep this policy as short and easy to understand as possible, we haven't set out the specific circumstances when each of these protection measures are used. You can contact us at privacy@gearset.com for more detail on this.

#### **Use of Artificial Intelligence**

We may use third party AI systems to help us better understand and improve how we work with our customers. When we use these third party AI systems we ensure the personal data we provide is kept within a Gearset-designated environment and is not used for training the third party's model in any way that it could be made available to another user of the third party AI system outside of Gearset.

## Your rights

You have rights as an individual which you can exercise in relation to the information we hold about you, including the right to:

- **access** to your personal data;
- correct incomplete or inaccurate data we hold about you;
- ask us to **erase** the personal data we hold about you;
- ask us to restrict our handling of your personal data;
- ask us to transfer your personal data to a third party;
- **object** to how we are using your personal data; and
- withdraw your consent to us handling your personal data.

If you would like to exercise any of these rights, please contact us at privacy@gearset.com.

#### Security and reporting issues

We have implemented technology and policies to help safeguard your privacy from unauthorized access and improper use. For example, transactions conducted through our websites are encrypted. We will continue to monitor and update security measures as new technology becomes available as appropriate to our websites.

If you become aware of a security vulnerability in any of our products, services or websites, contact security@gearset.com.

We encourage the responsible disclosure of security issues, and will act quickly on any vulnerabilities reported. We will not take legal action against you if you:

- provide us with the information needed to reproduce and validate the vulnerability;
- avoid violating the privacy of our customers, staff and other users;
- avoid the destruction of data, or degradation of our services;
- do not modify or access data that is not your own; and
- give us a reasonable time to address the issue before making any information public.

#### **Complaints and queries**

We strive to meet the highest standards when collecting and using personal data. We take complaints very seriously. If you feel our collection or use of information is unfair, misleading or inappropriate, we encourage you to bring this to our attention. We also welcome any suggestions for improving our procedures.

If you have any questions regarding this policy, or want to make a complaint about the way we've handled your personal data, email us at <u>privacy@gearset.com</u> or contact us at Gearset Limited, The

Bradfield Centre, Cambridge Science Park Rd, Cambridge, CB4 0GA, UK.

We have appointed a representative in the EU. You can contact them by post at Taylor Vinters Europe Limited (685267) with registered office at Clifton House, Fitzwilliam Street Lower, Dublin, Dublin, D02 Xt91, Ireland, or by email at representative@taylorvinters.com

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Helpline number: 0303 123 1113 ICO website: <u>https://www.ico.org.uk</u>

#### Questions about data privacy

Gearset Limited is the data controller for the personal data that you provide unless otherwise stated. If you have any queries about the process or how we handle your information, contact privacy@gearset.com.

## **Changes to this Privacy Policy**

If we decide to change our Privacy Policy, we will post the updated terms on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we would disclose it. This policy was last updated on 12 August 2024.