

## Introduction

This privacy policy is set out below and at <https://gearset.com/privacy>.

Gearset (which means Gearset Limited) respects your privacy. We endeavour to hold all information you give us with the utmost care and security.

Please take time to review this privacy policy as it sets out our privacy practices and tells you how your personal information 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 click see California Residents: Your Rights.

Any questions regarding Gearset's privacy policy should be directed to [legal@gearset.com](mailto:legal@gearset.com).

## How we use your information

Gearset is committed to protecting your privacy. If 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, this privacy policy sets out what data we collect, and how we use it. It also describes your rights regarding our use of your data.

Examples of the types of personal information we will collect are: name, job title, company, postal address, email address, phone number, IP address, and details of your usage of the Gearset website and product.

We may use the personal information provided to us in order to:

- process orders submitted by you;
- customize the service we provide to you;
- administrate or otherwise carry out our obligations in relation to any agreement you have with us;
- verify your identity (e.g. if you participate in any promotions administered by us);
- anticipate and resolve any problems with any goods or services supplied to you;
- carry out market research and surveys and track sales data;
- track your engagement with us, including through your use of our software, website, and your interaction with our emails;
- understand how you use our products and services;
- contact you in relation to your use of our software, or if you download any documents from our website;
- send you occasional emails with information about relevant topics and updates to our software and services; and/or
- contact you in relation to roles you may be interested in, and process your application if you apply for a role with us.

We may collect any personal information provided by you to us through this website or via use of our products, or we may collect this information via one of our telephone operators or through your email or other communications with us. We may collect anonymous answers to surveys or anonymous and



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aggregated information about how our products are used. Certain information is collected automatically, as described later in the privacy policy.

We may also combine personal information with Product Usage Data to provide and improve our products, services, content, and advertising.

Although we do not make it compulsory to give us every item of information we ask for, the more information volunteered by our customers (and the more accurate it is), the better we can match our services to the needs of the body of our customers.

We also collect information from you if you choose to take part in any of our on-site surveys or promotions. We will use this information to administer the promotion, help us to plan other promotions and improve the services we provide.

Where we carry out specific market research, whether directly or through a third party provider, we will collect information from you that we will use to improve the services that we provide.

## Visiting our website

When you visit our website, 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 do this to understand how people are using our website, to manage their operation and to diagnose any problems.

We also use third-party services to help us identify visitors to our website to improve the way we offer our products and services.

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

## Using Gearset products

When you use Gearset's products we collect specific data:

- **Product Usage Data** – We collect product usage data which records certain 'in-product' actions and activities such as 'run a comparison, 'link a source control repository', and 'create change monitor job'.
- **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 products we may collect data about the products and any problems you experience with them. This data helps us improve our products and services, to diagnose problems in the products you use, and provide solutions. Depending on your product and 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 to:

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



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- assist you in your evaluation, purchasing, and renewal of our products.

### Signing in with Google

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

- Basic profile information
- Social login information

Of the [information Google provides](#), Gearset will only store your Google ID, 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 Google account password. If you wish to remove the OAuth link between your Gearset and Google account, you can do this at any point from your Google account management.

### Preview Software

Gearset may on occasion offer preview software or other optional features that will enable you to use them while providing feedback and usage data to Gearset.

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 previews or pre-release programs, we may contact you about your feedback or your interest in continuing to use the product after general release.

### Third-parties and their sites

Certain Gearset services, such as payment processing and support ticketing, are offered in conjunction with our (third-party) business providers. In such cases, we may need to share your personal information 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 information 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 information stored by such third parties shall be subject to their privacy provisions. At this time, these third parties include:

- **FastSpring** - We use FastSpring to handle all payment processing for Gearset subscriptions. To learn more about FastSpring's data protection policies, visit <https://fastspring.com/privacy/>.
- **Intercom** - We use Intercom to power our live chat and support ticketing system. To learn more about Intercom's data protection policies, visit <https://www.intercom.com/privacy>.

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

### Newsletters, updates and other relevant communications

We send email newsletters, updates and other relevant communications using Intercom. We gather statistics around email opening and interaction with these emails using industry-standard technologies, including tracking pixels, to analyze the performance of email campaigns. We use data about your interactions with our emails as an indicator of your interest in our products. We may also use your interaction with our previous emails to send you more appropriate information in the future.



You can opt out of receiving these emails at any time by clicking the unsubscribe link in these emails, or by managing your email preferences within Gearset.

## Contacting us via social media

Gearset maintains a presence on Twitter, Facebook, LinkedIn, Google Plus 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.

## Connecting with our product support teams

If you engage with our support teams, we may ask you to provide additional information to help us assist you. We may share this with our product 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.

## Call Recording

We record some calls for training and quality purposes to help us evaluate our performance and better understand the needs of our customers. If you live in the USA and two-party consent is required, we'll let you know we're recording the call at the start.

### 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 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.

## Cookies

Cookies are very small text files saved to your computer used to track user navigation around a website. At Gearset session cookies are used when users visit the website. Gearset will use such cookies to identify unique users to our websites and services.

Gearset 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 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.

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 <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 website does not honor DNT signals, but you can set your browser settings to restrict the placement of cookies as described below.

## Disclosures

Other than the disclosures referred to in this policy, we will not disclose any personal information 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 information 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.

## 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 information 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.

## Your rights

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

- confirmation of personal data that is being processed; and
- access to your personal data.

If you would like to exercise any of these rights, please contact us at [legal@gearset.com](mailto:legal@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 the website are encrypted. We will continue to monitor and update security measures as new technology becomes available as appropriate to the website.

If you become aware of a security vulnerability in any of Gearset’s products, services or websites, contact [security@gearset.com](mailto: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;



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- 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

Gearset strives to meet the highest standards when collecting and using personal information. 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 information, email us at [legal@gearset.com](mailto:legal@gearset.com) or contact us at Gearset Limited, The Bradfield Centre, Cambridge Science Park Rd, Cambridge, CB4 0GA, UK.

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: <https://www.ico.org.uk>

## Questions about data privacy

Gearset is the data controller for the information you provide unless otherwise stated. If you have any queries about the process or how we handle your information, contact [security@gearset.com](mailto:security@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 14th February 2023.

## Legal

Gearset Limited is a company incorporated in England and Wales with company number 10345423) and with its registered office address at The Bradfield Centre, Cambridge Science Park Road, Cambridge, United Kingdom, CB4 0GA.

We may process your personal data under one or more of the following legal bases: consent, where you have provided this; contract (where we are providing our services to you); legitimate interest to promote our business and develop our customer relationships; or legal obligation, where we have a legal requirement to do so.