

GLOWBL Privacy Policy

The original version of this document is in French (France). In the event of a conflict between the translation of this document and the original version, the original version will prevail over any other version.

1. About this Privacy Policy
2. Definitions
3. When does this Privacy Policy not apply?
 - 3.1. When an Administrator decides how to use your Information
 - 3.2. When you use Third-Party Services
4. How can I contact you?
5. What information do We collect about you?
6. Why is it mandatory to provide some Information?
7. What do you use my Information for?
8. How long do you store my Information?
9. Do you profile me using my Information?
10. Who has access to my Information?
11. How do you keep my Information safe?
12. Where is my Information stored?
13. Do you use cookies?
14. How can I prevent the use of cookies?
15. What rights do I have?
16. How can I exercise my rights?

1. About this Privacy Policy

This Privacy Policy applies to the Information that We collect about you when you use Our Services, Our Application, or when you visit Our Website and We act as Data Controller within the meaning of the law.

We deeply care about protecting your personal data and strive to ensure that Our Privacy Policy is understandable, transparent, and compliant with European Union Regulation 2016/679—the General Data Protection Regulation (“**GDPR**”)—and national law (the French Data Protection Act of January 6, 1978 as amended on June 22, 2018).

This Privacy Policy is effective as of August 1, 2018.

We can modify or amend this Privacy Policy at any time if We change the way We treat your Information. If this occurs, We will inform you within a reasonable period of time before the new Privacy Policy takes effect, either by sending you an email, sending you a notification in Our Application, or displaying a message on Our Website.

2. Definitions

When We use capitalized terms in this Policy, We are referring to the following definitions:

“**Application**” means Glowbl’s mobile application, available for download in the Apple App Store and the Google Play Store.

“**Policy**” means this Privacy Policy.

“**Information**” means any personal data about you, whether this Information can be used to identify you directly or indirectly.

“**We,**” “**Us,**” “**Our,**” and “**Glowbl**” mean Our company, Glowbl, a simplified joint-stock company (*société par actions simplifiée*) with share capital in the amount of €32,252, registered with the Lyon Corporate Register under company number (*SIRET*) 535 328 694 and headquartered at 81 Rue d’Inkermann, 69006 Lyon, France.

“**Services**” means online videoconferencing services provided by Glowbl through its Application or its Website.

“**Third-Party Services**” means services, software, applications, or APIs supplied to Glowbl by third-party companies and usable or compatible with Glowbl’s Services.

“**Website**” means the website accessible using the domain name glowbl.com.

“**Administrator**” means an individual who organizes a LiveStage and invites you to join it, or a legal entity to which you belong or with which you are associated (such as your employer, your university, your training center, or any other organization) that is separate and distinct from Glowbl and that has entered into a contractual agreement with Glowbl to authorize you to use Our Services.

“**Virtual Space**” or “**LiveStage**” means a videoconferencing session created using the Services and administered and run by an Administrator for the Administrator’s own needs.

“**LiveStage Data**” means the data exchanged in a Virtual Space, whether it consists of video, image, sound, messages, or files and/or personal data about you.

3. When does this Privacy Policy not apply?

This Policy only applies when We decide how to use your Information (when We act as Data Controller within the meaning of the law).

To ensure that you fully understand, the Policy does not apply in the following situations:

3.1. When an Administrator decides how to use your Information

- **The Policy does not apply when an Administrator decides how to use your Information (when an Administrator acts as Data Controller within the meaning of the law) and We are simply following the Administrator's instructions (when We are a subcontractor within the meaning of the law).**

Example: The Policy does not apply when an Administrator decides to create a user account for you, configures the Services you use, modifies your access rights to the Services, or suspends your user account.

- **The Policy does not apply to Information/LiveStage Data that you exchange or create in the Virtual Space administered and supervised by an Administrator.**

Example: The Policy does not apply to files, content, messages, and Information that you, the Administrator, or other users use, store, exchange in the Virtual Space, share, or download outside of the Virtual Space.

To learn about how your personal data is used or exercise your rights concerning how your data is used by an Administrator, you should directly contact the Administrator in question.

3.2. When you use Third-Party Services

The Policy does not apply when you use Third-Party Services, even if they are used with or compatible with Glowbl's Services.

Use of Third-Party Services remains subject to the respective Terms of Use and the Privacy Policy of the companies responsible for the Third-Party Services.

Example: When you download your list of contacts from Gmail, Yahoo, or Outlook.

To learn about how your personal data is used or exercise your rights concerning how your data is used by these third-party companies, you should directly contact the companies in question.

4. How can I contact you?

GLOWBL has appointed a Data Protection Officer. This is the individual to contact if you need further information about how We use your Information or if you would like to exercise your rights.

You can contact the Data Protection Officer several ways:

By mail: GLOWBL, Attn. Data Protection Officer, 81 Rue d'Inkermann, 69006 Lyon, France

By phone: +33 (0)4 82 53 97 17

By email: contact-dpo@glowbl.com

Please note that We can only answer questions or requests to exercise rights that concern this Policy. For further information, see Section “3. When does this Privacy Policy not apply?”.

5. What information do We collect about you?

We use different types of Information about you, some of which you yourself provide (both required or optional in nature) and some of which We collect automatically.

Information about you (Customer or Prospect)	First and last name, email address, company name, type of company, position in the company, country, needs expressed, offers that interest you (subscription package, custom package), comments and questions submitted.
Information related to your account:	Email, username, password, first and last name, avatar, your contacts, your access rights and privileges, etc.
Information related to your subscription:	Subscription type, payment information, Administrator attached to your account, etc.
LiveStage broadcasts:	Voice and video, instant messages.
Metadata:	Data that is created when you use Our Services, such as the names of the LiveStages you create, the user you invite, privacy settings, activity timestamps, the number of LiveStages created, the number of LiveStage creators, etc.
Connection data:	Connection logs, IP address, web browser used, timestamps, referrer, etc.
Information about your device configuration:	Your operating system, the brand/model of your device, display resolution, etc.
Information collected from Third-Party Services	Any information that you decide to share with Us via Third-Party Services (such as the list of your contacts, etc.)
Information collected using cookies	For further information, see Section “13. Do you use cookies?”.

6. Why is it mandatory to provide some Information?

Sometimes We have a real need for your Information. For example, We need your email address and password.

Not providing mandatory information can have consequences: We cannot create your account, We cannot provide the Service in question, etc.

When Information is mandatory, We explain why We need the Information near the entry field.

7. What do you use my Information for?

We use your Information for a number of purposes, which fall into the following categories:

- We may need your Information to provide Our Services (**Contract performance**);
- We may need your Information to comply with a legal obligation (**Legal obligation**);
- We may have a legitimate interest in using your Information (**Legitimate interest**);
- We use your Information because We have obtained your consent (**Consent**).

Providing Our Services	Contract performance
Customer relations, subscription management, and invoicing	Contract performance
Satisfaction surveys	Legitimate interest
Usage statistics for Our Services	Legitimate interest
Answering your questions	Legitimate interest
Handling your complaints or requests to exercise your rights	Contract performance/legal obligation
Sending activity notifications by email	Legitimate interest
Sending Our newsletter	Legitimate interest
Sending emails informing users of how Glowbl works, tutorials for Our Services	Legitimate interest
Sending you business offers related to the Services you already use	Legitimate interest
Sending you business offers from Our business partners	Consent
Keeping Our Services safe and updated	Legitimate interest
Keeping connection logs	Legal obligation

8. How long do you store my Information?

We store your Information for periods that vary according to the purpose for which We collect it.

Information collected using cookies is stored for a maximum period of 13 months. For further information, see Section “13. Do you use cookies?”.

Information about traffic on Our Services is stored for a maximum period of 12 months after it is collected, in accordance with applicable law.

Information associated with your Glowbl account is stored for as long as you use Our Services, and for a maximum period of 3 years after the last time you use Our Services or the last time We were in contact with you (for example, a click on a link in one of Our newsletters).

Information about your customer relationship with Us is stored for 3 years following the end of Our business relationship (for example, the last time you made a payment for Our Services, or when the agreement between us was terminated).

Prospecting Information is stored for 3 years after the last time We were in contact with you (for example, when We sent you a sales brochure that you requested from Us, an email concerning a request for a quote, etc.).

Beyond this period, some business Information can be archived for longer periods outside of Our active database, specifically for evidence-related purposes during the applicable statute of limitations (5 years for civil and commercial actions), as well as for accounting purposes (10 years from the date of the documents).

The storage period for LiveStage Data is exclusively determined by your Administrator. To learn more about how your personal data is used by your Administrator in the Virtual Space run by the Administrator, you should directly contact the Administrator in question. To learn more, see Section “3. When does this Privacy Policy not apply?”.

9. Do you profile me using my Information?

Profiling consists, for example, of evaluating personal attributes, preferences, or interests and predicting behavior. We do not profile Our users.

10. Who has access to my Information?

Other GLOWBL Users:

When you make certain profile Information public, and when you participate in a LiveStage, some of your Information such as your name, username, or the messages that you publish can be seen by other users of the Services offered by Glowbl. When you participate in a LiveStage, your voice and image can be seen and heard by other users authorized to join the LiveStage, and your public messages can be seen by them.

You can verify and modify the Information that other user can see in your public profile by adjusting your public profile settings.

The Administrator:

When an Administrator gives you authorization to use Our Services, the Administrator can gain access to some of your Information, as well as to LiveStage Data from the Virtual Space. The Administrator is responsible for how he or she uses Virtual Space and LiveStage Data. For further information, see Section “3. When does this Privacy Policy not apply?”.

Our Staff:

Your Information can be made available to different members of Our staff, depending on the purposes for which We use the Information. For example, Our Marketing staff can access your Information to send you email, Our Support staff can access your Information to help you use GLOWBL, Our Technical staff can access your Information to repair a but with Our Services, etc.

Our Technical Service Providers:

Who?	Why?
Amazon Web Services	To host Our Services and your Information
HubSpot	To handle customer relations and sales management. To oversee customer support. For marketing activities, such as Our email marketing campaigns.
Google Analytics	To measure the audience of Our Services

To Regulatory and Judicial Authorities:

To comply with applicable law, when GLOWBL receives a request from a regulatory, judicial, or police authority asking for certain Information.

11. How do you keep my Information safe?

Glowbl uses the best possible security measures to ensure the confidentiality, availability, and integrity of your Information. In particular, Glowbl only hires service providers who with a recognized track record in terms of security.

However, you remain responsible for keeping your password a secret and for how it is used.

12. Where is my Information stored?

We host your Information on servers located in Europe. We can, however, stream Our video feeds from servers close to your geographic area to enhance the quality and speed of Our Services.

We can only transfer your Information to entities outside of the European Union or process your Information outside of the European Union if these entities have taken adequate safeguards to ensure the protection of personal data.

For example, adequate safeguards may include:

- an “adequacy decision” (accreditation) from the European Commission;
- model contracts for the transfer of personal data adopted by the European Commission;
- codes of conduct approved in accordance with the GDPR;
- certification mechanisms approved in accordance with the GDPR;
- contractual terms approved by the CNIL.

Entity Concerned by Transfers Outside of the EU	Adequate Safeguard (Type of Safeguard + Verification Method)	Country Concerned by Transfers Outside of the EU
Amazon Web Services (Only for the quality and speed of video streaming for users located outside of the EU)	Privacy Shield adequation decision and Amazon certification https://www.privacyshield.gov/participant?id=a2zt0000000TOWQAA4&status=Active	USA
	European Commission model contract https://d1.awsstatic.com/legal/aws-gdpr/AWS_GDPR_DPA.pdf	For transfers to other countries (excluding the United States)
Google LLC	Privacy Shield adequation decision and Google certification https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI	USA
HubSpot Inc	Privacy Shield adequation decision and HubSpot certification https://www.privacyshield.gov/participant?id=a2zt0000000TN8pAAG&status=Active	USA
	European Commission model contract https://legal.hubspot.com/dpa#exhibit-1	For transfers to other countries (excluding the United States)

13. Do you use cookies?

Yes, there are several reasons that We use cookies and tracking files on Our Website and Our Application.

A “cookie” is a small file, generally made up of letters and numbers, sent by an online server to the browser’s cookie file, which is stored on your computer’s hard drive.

We use different categories of cookies:

Technical Cookies

We need to use these cookies to ensure that Our Application works properly.

Technical cookies can, for example, tell Us whether you are connected, provide you the language of your choice, display the Website in accordance with your display preferences, better manage Our server load, etc.

Audience Measurement Cookies

We use these cookies so that We can better understand the way you use Our Services, the features you use most often, etc.

Advertising/Marketing Cookies

We use advertising/marketing cookies to show you ads that interest you or to personalize some of the content or pages you see. These advertising cookies collect your Information when you use Our Application and when you visit Our Website, which also contains these cookies. These (third-party) cookies are created by advertising or marketing companies.

The following is a list of the cookies that We use:

Category	Cookie Source	Cookie/Tracking File Name	Purpose	Cookie Lifespan	Learn More
Technical Cookies		PHPSESSID	PHP-specific technical cookie strictly needed for the Website to work properly.	1 week	
Audience Measurement Cookies	Google Analytics	_gid	These cookies are provided by Google Analytics, and We use them to gather statistics and measure the audience of Our Services (page visits, user location, page visit time, etc.).	24 hours	https://support.google.com/analytics/answer/6004245
		_gat		1 minute	
		_ga		13 months	
Advertising/Marketing Cookies	HubSpot	hubspotutk	This cookie tracks a user's identity. HubSpot sends it when a form is submitted, and it is used to individualize users.	10 years	https://knowledge.hubspot.com/fr/articles/kcs_article/reports/what-cookies-does-hubspot-set-in-a-visitor-session-browser
		__hssrc	This cookie is also saved as soon as HubSpot modifies the session cookie. It is simply set on 1, and tells Us whether a user as closed and reopened his or her browser. If this cookie is not present when cookies are processed, We assume that it is a new session.	Session time	
		__hstc	The main cookie for tracking users. It contains the domain, the utk (see below), the initial timestamp (first visit), the last timestamp (last visit), the current timestamp (current visit), and the session number (increases with each subsequent session).	2 years	
		__hssc	This cookie tracks sessions. It makes it possible to determine whether the session number and timestamp need to be updated in the __hstc cookie. It contains the domain, the number of views (increases with each subsequent session) and the session start timestamp.	30 minutes	
Advertising/Marketing Cookies	Google Adwords	Cookie Name	Conversion tracking cookie that measures your interaction with ads and prevents individual ads from being shown to you too often.	30 days	https://policies.google.com/technologies/types?hl=fr

14. How can I prevent the use of cookies?

There are several ways to prevent the use of cookies.

You can specify your preferences with an email to contact@glowbl.com.

By using the tracking tools offered by the creators of the cookies in question to indicate that you do not want to be tracked: When they exist, they are listed in the cookie table above.

You can also tell many companies that create tracking cookies that you do not want to be tracked using the website Your Online Choices: <http://www.youronlinechoices.com/uk/your-ad-choices>

15. What rights do I have?

You can update your account Information at any time by modifying your user profile settings.

You possess a number of rights to the Information in Our possession:

The right to access:	You can ask Us for access to all of the Information about you in Our possession. You can ask Us to correct your Information.
The right to rectification:	More often than not, you can correct your Information yourself by connecting to the Application or the Website or by writing to contact@glowbl.com You can ask Us to stop using your Information when We are not doing so for a legitimate interest.
The right to object:	You can also ask Us to stop sending you prospecting/direct marketing messages. You can do so easily by clicking on the link at the bottom of the emails We send or by writing to contact@glowbl.com .
The right to withdraw consent:	When you have granted your consent for your Information to be used for a specified purpose, you are entitled to withdraw your consent at any time. If you do, We will stop using your Information for the purpose in question. You can do so by writing to contact@glowbl.com .
The right to deletion:	You can ask Us to delete or stop using your Information.
The right to limitation:	You can ask Us to block the use of your Information—that is, to store it temporarily but to stop using it.
The right to data portability:	You can export your Information in a reusable format, or, when it is feasible, ask Us to transfer it to another company who can reuse it.
The right to file a complaint:	You can file a complaint with the Data Protection Authority (in France, the CNIL www.cnil.fr) at any time if you feel that your rights have not been respected.

16. How can I exercise my rights?

To exercise your rights, contact Us using the contact information provided in the Article “How can I contact you?”.

We will do everything possible to answer you within one month.

Sometimes, We are unable to accept a request because the right does not apply. In this case, We will explain the reasons to you.

We can also ask you for identification to be sure that you are really the person you claim to be.

Please note that We can only answer questions or requests to exercise rights that concern this Policy. For further information, see Section “3. When does this Privacy Policy not apply?”.