

# GLOW PRIVACY POLICY

Effective date: November 21, 2021. View previous version here (</privacy-20201217>).

We take your privacy very seriously. This Privacy Policy describes the privacy practices of Upward Labs Holdings, Inc. (together with Glow, Inc., the Glow First Trust and our other affiliates, "**Glow**," "**we**", "**us**" or "**our**") and how we handle personal information that we collect through our websites and mobile applications that link to this Privacy Policy (collectively, the "**Service**"), as well as through social media, our marketing activities and other activities described in this Privacy Policy. This Privacy Policy also describes your choices and rights with respect to your personal information.

We may provide additional, different or supplemental privacy notices for specific products, services, or other business activities that we offer or in which we are engaged. For example, if you enroll in a study that we conduct, we may provide you with a privacy notice that governs how your personal information may be collected, used, and shared in connection with the study.

You can download a printable copy of this Privacy Policy here (</static/files/privacy-20211121.pdf>).

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## **Personal information we collect**

**Information you provide to us.** The specific personal information we collect will depend on which Glow app you use and the features you choose to interact with. Not all of the features described in this Privacy Policy are available on every Glow app and certain categories of personal information described in this Privacy Policy are relevant to only certain Glow apps. Personal information you may provide to us through the Service or otherwise includes:

- **Account data** that you provide to create an account on the Service, including your name, email address, password, date of birth and mobile phone number.
- **Profile data** that you chose to add to your profile on the Service, such as your name, profile photo, location (e.g., city, state, country), ethnicity, gender, relationship status, interests, preferred language, occupation and insurance type.
- **Health data** that you choose to provide:

- directly through the Service, such as information about your physical attributes, sexual orientation, fertility, pregnancy, sexual activity, menstrual activity, sleep activity, mood, health conditions, medications, and number of children; and
  - through your mobile health apps, such as Apple HealthKit, Samsung Health, Google Fit, MyFitnessApp, which may include any information you chose to store in those apps, subject to your preferences for those apps.
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- **Data about others**, such as
    - the names and contact details of the spouses, partners or caregivers to whom you choose to grant access to information in your Glow app;
    - information in the Glow app of anyone who has granted you access to it;
    - the names and contact details of health care providers with whom you chose to share information in your account via emails generated through the Service;
    - the email address of anyone you invite to use the Service through features in the Service, and the name of anyone who sent you such an invitation; and
    - information that you chose to share about your children, which may include their name, date of birth, ethnicity, height, weight, other physical attributes, photos, feeding activity, sleep activity, developmental milestones, health and medications.
  - **Communications** that we exchange with you, including when you contact us with questions or feedback, through social media, or otherwise.

- **Payment and transactional data** needed to complete your orders on or through the Service (including name, address, payment card information, billing information), and your transaction history.
- **Marketing data**, such as your preferences for receiving our marketing communications and details about your engagement with them.
- **User generated content** that you upload, generate, transmit, or otherwise make available on the Service, such as profile pictures, photos, videos, images, music, videos, comments, questions, messages, your “likes”, as well as associated metadata. Metadata includes information on how, when, where and by whom a piece of content was created or collected, how that content has been formatted or edited, and the location associated with the creation of the content.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

**Third party sources.** We may combine personal information we receive from you with personal information we obtain from other sources, such as social media accounts that you use to log into or connect to the Service, which will allow us to collect the information you chose to make available in your settings on that social media account.

**Automatic data collection.** We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- **Device data**, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., WiFi, LTE, 3G), and general location information such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access, and whether you have opened our marketing emails or clicked links within them.
- **Precise geolocation data** when you authorize our mobile application to access your device's location.

**Cookies.** Some of our automatic data collection is facilitated by cookies and similar technologies. For more information, see our Cookie Notice (</cookie-policy-20201217>).

**Data about others.** Users of the Service may have the opportunity to refer friends or other contacts to us and share their contact information with us. Please do not refer someone to us or share their contact information with us unless you have their permission to do so.

### **How we use your personal information**

We use your personal information for the following purposes or as otherwise described at the time of collection:

**Service delivery.** We use your personal information to:

- provide, operate and improve the Service and our business;
- establish and maintain your user profile on the Service;
- refer your contacts to join the Service;
- communicate with you about the Service, including by sending announcements, updates, security alerts, and support and administrative messages;
- understand your needs and interests, and personalize your experience with the Service and our communications; and
- provide support for the Service, and respond to your requests, questions and feedback.

**Research and development.** We may use your personal information for research and development purposes, including to analyze and improve the Service and our business. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

**Marketing and advertising.** We, our service providers and our third party advertising partners may collect and use your personal information for the following marketing and advertising purposes:

- **Direct marketing.** We may send you Glow-related or other direct marketing communications as permitted by law. You may opt-out of our marketing communications as described in the Opt-out of marketing section below.

- **Interest-based advertising.** We may engage third-party advertisers or advertising companies to display ads on our Service and other online services. These companies may use cookies and similar technologies to collect information about your interaction (including the data described in the automatic data collection section above) over time across the Service, our communications and other online services, and use that information to serve online ads that they think will interest you. This is called interest-based advertising. We may also share names, email addresses and device identifiers our users with these companies to facilitate interest-based advertising to those or similar users on other online platforms. You can learn more about your choices for limiting interest-based advertising in the Your choices (</cookie-policy-20201217#your-choices>) section of our Cookie Notice.

**Compliance and protection.** We may use your personal information to:

- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities;
- protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

**Retention.** We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.

### **How we share your personal information**

We may share your personal information with the parties below, with other third parties with your consent, and as otherwise described in this Privacy Policy or at the time of collection.

**Other users and the public.** Your name, profile URL, and any location or profile photo that you choose to add to your profile are visible to other users of the Service and the public by default, but you can choose to make your profile private in your account settings. Unless you elect to hide them in your settings, your posts on the Service will be visible to other users of the Service and the public. This information may be seen, collected, used and shared by others, and we are not responsible for their collection, use or sharing of this information.



**Third party apps.** You may instruct us to share certain of your personal information with third party apps such as Samsung Health, Apple Healthkit, Google Fit and MyFitnessApp. These parties will use your personal information as described in their respective privacy policies. Samsung's privacy policy can be found at <https://www.samsung.com/us/privacy/> (<https://www.samsung.com/us/privacy/>), Apple's privacy policy can be found at <https://www.apple.com/privacy/privacy-policy/> (<https://www.apple.com/privacy/privacy-policy/>), Google's privacy policy can be found at [http://www.google.com/intl/en\\_us/policies/privacy/](http://www.google.com/intl/en_us/policies/privacy/) ([http://www.google.com/intl/en\\_us/policies/privacy/](http://www.google.com/intl/en_us/policies/privacy/)) and MyFitnessApp's privacy policy can be founded at <https://support.myfitnesspal.com/hc/en-us/sections/360006073651-PRIVACY-POLICY-AND-TERMS> (<https://support.myfitnesspal.com/hc/en-us/sections/360006073651-PRIVACY-POLICY-AND-TERMS>).

**Affiliates.** Our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

**Service providers.** Companies and individuals that provide services on our behalf or help us operate the Service or our business (such as hosting, information technology, customer support, email delivery, marketing, and website analytics) to facilitate the provision of such services.

**Payment processors.** Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors, such as Stripe. Stripe may use your payment information as described in its privacy policy: <https://stripe.com/privacy> (<https://stripe.com/privacy>)

**Advertising partners.** Third party advertisers and advertising companies for the interest-based advertising purposes described above. Advertisers whose ads are posted on our Service may be able to infer information about you when you click on those ads (e.g., that you have a newborn if you click on an ad about a newborn product).

**Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.

**Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.

**Business transferees.** Acquirers and other relevant participants in business transactions (or negotiations for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale or other disposition of all or any portion of the business or assets of, or equity interests in, Glow or our affiliates (including, in connection with a bankruptcy or similar proceedings).

## **Your choices**

You have the following choices with respect to your personal information.

**Access or update your information.** If you have registered for a Service account with us, you may review and update account information by logging into the account.

**Delete your data.** You may request to delete the personal information you have provided through the Service by emailing [privacy@glowing.com](mailto:privacy@glowing.com) (mailto:privacy@glowing).

**Delete your Glow account.** You may request to delete your Glow account by emailing [privacy@glowing.com](mailto:privacy@glowing.com) ([mailto:privacy@glowing](mailto:privacy@glowing.com)).

**Revoking your consent.** If we have asked for your consent or affirmative authorization to collect, use or share your personal information, you can revoke it either in the relevant privacy settings in your Glow app or by emailing us at [privacy@glowing.com](mailto:privacy@glowing.com) (<mailto:privacy@glowing.com>). If, notwithstanding the choices available to you as described in this “your choices” section, you wish to revoke your authorization for Glow to handle your personal information as described in this Privacy Policy, you may do so by requesting that we delete your Glow account and the personal information that you have provided through the Service by emailing us at [privacy@glowing.com](mailto:privacy@glowing.com) (<mailto:privacy@glowing.com>). We will process such requests within a reasonably prompt timeframe after receipt and your revocation will become effective once processing is complete, until which time we will continue to handle your personal information as described in this Privacy Policy

**Opt-out of marketing communications.** You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by contacting us. You may continue to receive service-related and other non-marketing emails.

**Opt-out of personalized ads.** You can opt-out of personalized ads on our apps and tracking for interest-based advertising purposes by using the disable personalized ads feature in your settings.

**Cookies.** For information about cookies employed by the Service and how to control them, see our Cookie Notice (</cookie-policy-20201217>).

**Mobile device permissions.** You can use your mobile device's privacy settings to disable our access to any data granted through them, such as your device's precise geolocation, contacts and photos.

**Do Not Track.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com> (<http://www.allaboutdnt.com>).

**Third party platforms.** If you choose to connect to the Service through your social media account, you may be able to use your settings in your account with that platform to limit the information we receive from it. If you revoke our ability to access information from a third party platform, that choice will not apply to information that we have already received from that third party.

**Legal rights.** You may have certain legal rights with respect to your personal information. See the California privacy rights notice or the Notice for European users for information about the rights available to individuals in those locations. If you would like to exercise other legal rights not described in this Privacy Policy, contact us at [privacy@glowing.com](mailto:privacy@glowing.com) ([privacy@glowing.com](mailto:privacy@glowing.com)).

**Declining to provide information.** We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

### **Other sites and services**

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services

that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions.

## **Security**

We employ a number of technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

## **International data transfer**

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

## **Children**

The Service is not intended for use by children under 16 years of age. If we learn that we have collected personal information through the Service from a child under 16 without the consent of the child's parent or guardian as required by law, we will delete it.

## **Changes to this Privacy Policy**

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Service. Any

modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acceptance of the modified Privacy Policy.

## **How to contact us**

Upward Labs Holdings, Inc.

555 Kearny Street

7th Floor

San Francisco, California 94108

United States of America

privacy@glowing.com (mailto:privacy@glowing.com)

## **California privacy rights notice**

This section applies only to California residents. It describes how we collect, use, and share Personal Information of California residents in our capacity as a “business” under the California Consumer Privacy Act (“**CCPA**”) and their rights with respect to that Personal Information. For purposes of this section, “**Personal Information**” has the meaning given in the CCPA but does not include information exempted from the scope of the CCPA. In some cases we may provide a different privacy notice to certain categories of California residents, such as job applicants, in which case that notice will apply instead of this section.

**Your California privacy rights.** As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected and used your Personal Information during the past 12 months:

- The categories of Personal Information that we have collected.
- The categories of sources from which we collected Personal Information.
- The business or commercial purpose for collecting and/or selling Personal Information.
- The categories of third parties with whom we share Personal Information.
- The categories of Personal Information that we sold or disclosed for a business purpose.
- The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.
- **Opt-out of sales.** You can opt-out any sale of your Personal Information.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

**Right to information, access and deletion.** You may submit requests to exercise your right to information, access or deletion via email to [privacy@glowing.com](mailto:privacy@glowing.com) ([privacy@glowing.com](mailto:privacy@glowing.com)) or at <https://support.glowing.com/hc/en-us/requests/new> (<https://support.glowing.com/hc/en-us/requests/new>)

## **Notice of right to opt-out of the “sale” of your Personal**

**Information.** Like many companies, we use services that help deliver interest-based ads to you, as we have described above. Our use of some of these services may be classified under California law as a “sale” of your Personal Information. You can request to opt-out of this “sale” of your personal information here: Do Not Sell My Personal Information ([https://support.glowing.com/hc/en-us/requests/new?ticket\\_form\\_id=360002395994](https://support.glowing.com/hc/en-us/requests/new?ticket_form_id=360002395994)), where you will find instructions on opting-out of the use of your information for interest-based advertising.

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

We will need to verify your identity to process your information, access and deletion requests and reserve the right to confirm your California residency. To verify your identity, we may require authentication into your Glow account, government identification, a declaration under penalty of perjury or other information. Your authorized agent may make a request on your behalf upon our verification of the agent’s identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CCPA rights on your behalf, provide the information we request to verify your identity, and provide us with confirmation that you have given the authorized agent permission to submit the request.

**Personal information that we collect, use and disclose.** The chart below summarizes the Personal Information we collect by reference to the statutory categories of Personal Information specified in the CCPA, and describes our practices currently and during the 12



months preceding the effective date of this Privacy Policy. The categories of personal information, sources, purposes and third parties listed in the chart below are described in more detail above. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

<u>Statutory category</u> PI we collect in this category	Source of PI	Business/commercial purpose for collection	Categories of third parties to whom we “disclose” PI for a business purpose*	Categories of third parties to whom we “sell” PI
<u>Identifiers</u> <ul style="list-style-type: none"> <li>• Account data</li> <li>• Profile data</li> <li>• Data about others</li> <li>• Device data</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third party sources</li> <li>• Automatic collection</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Marketing &amp; advertising</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Payment processors</li> <li>• Advertising partners</li> <li>• Business and marketing partners</li> <li>• Other users and the public</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners to facilitate online advertising (device data only)</li> </ul>
<u>Medical Information</u> <ul style="list-style-type: none"> <li>• Profile data</li> <li>• Health data</li> <li>• Data about others</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> <li>• Third party sources</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Third party apps (with your consent)</li> <li>• Other users and the public (with your consent)</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

<u>Statutory category</u> PI we collect in this category	Source of PI	Business/commercial purpose for collection	Categories of third parties to whom we “disclose” PI for a business purpose*	Categories of third parties to whom we “sell” PI
<u>California Customer Records</u> (as defined in California Civil Code section 1798.80) <ul style="list-style-type: none"> <li>• Account data</li> <li>• Profile data</li> <li>• Health data</li> <li>• Payment &amp; transactional data</li> <li>• User-generated content</li> <li>• Data about others</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Marketing &amp; advertising</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Payment processors</li> <li>• Other users and the public (with your consent)</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
<u>Commercial Information</u> <ul style="list-style-type: none"> <li>• Payment &amp; transactional data</li> <li>• Marketing data</li> <li>• Communications</li> <li>• Online activity data</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• Automatic collection</li> <li>• Service delivery</li> <li>• Marketing &amp; advertising</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Payment processors</li> <li>• Advertising partners</li> <li>• Business and marketing partners</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners (to facilitate online advertising)</li> </ul>
<u>Financial Information</u> <ul style="list-style-type: none"> <li>• Payment &amp; transactional data</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Payment processors</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
<u>Internet or Network Information</u> <ul style="list-style-type: none"> <li>• Marketing data</li> <li>• Device data</li> <li>• Online activity data</li> </ul>	<ul style="list-style-type: none"> <li>• Automatic collection</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Marketing &amp; advertising</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Payment processors</li> <li>• Advertising partners</li> <li>• Third party app</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners (to facilitate online advertising)</li> </ul>

<u>Statutory category</u> PI we collect in this category	Source of PI	Business/commercial purpose for collection	Categories of third parties to whom we “disclose” PI for a business purpose*	Categories of third parties to whom we “sell” PI
<u>Geolocation Data</u> <ul style="list-style-type: none"> <li>• Device data</li> <li>• Precise geolocation data</li> </ul>	<ul style="list-style-type: none"> <li>• Automatic collection</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Marketing &amp; advertising</li> <li>• Compliance &amp; protection</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Advertising partners</li> <li>• Business and marketing partners</li> <li>• Other users and the public</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners (to facilitate online advertising)</li> <li>• Business and marketing partners</li> </ul>
<u>Inferences</u> May be derived from your: <ul style="list-style-type: none"> <li>• Profile data</li> <li>• Payment &amp; transactional data</li> <li>• Marketing data</li> <li>• User-generated content</li> <li>• Device data</li> <li>• Online activity data</li> </ul>	N/A	<ul style="list-style-type: none"> <li>• Service delivery</li> <li>• Research &amp; development</li> <li>• Marketing &amp; advertising</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> <li>• Advertising partners</li> </ul>	<ul style="list-style-type: none"> <li>• Advertising partners (to facilitate online advertising)</li> </ul>
<u>Protected Classification Characteristics</u> We do not intentionally collect this information but it may be revealed in identity data or other information we collect	N/A	N/A	N/A	No
<u>Sensory Information</u> <ul style="list-style-type: none"> <li>• Profile data</li> <li>• User-generated content (images, video or audio)</li> </ul>	<ul style="list-style-type: none"> <li>• You</li> </ul>	<ul style="list-style-type: none"> <li>• Service delivery</li> </ul>	<ul style="list-style-type: none"> <li>• Affiliates</li> </ul>	No

\*We may also share the categories of personal information described above with our professional advisors, authorities and others and business transferees as described above in How we share your personal information

**Your California privacy rights.** Under California's Shine the Light law (California Civil Code Section 1798.83), California residents may ask companies with whom they have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to which they have disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for their own direct marketing purposes and the categories of personal information disclosed. You may send us requests for this information to [privacy@glowing.com](mailto:privacy@glowing.com) (<mailto:privacy@glowing.com>). In your request, you must include the statement "Shine the Light Request," and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

### **Notice to European users**

The information provided in this "Notice to European users" section applies only to individuals in the European Economic Area, United Kingdom and Switzerland, which we refer to in this notice collectively as "Europe".

**Personal information.** References to "personal information" in this Privacy Policy are equivalent to "personal data" governed by European data protection legislation.

**Controller.** Glow is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation.

**Data Protection Officer.** Our data protection officer can be reached at [GlowDataProtectionOfficer@glowing.com](mailto:GlowDataProtectionOfficer@glowing.com) (mailto:[GlowDataProtectionOfficer@glowing.com](mailto:GlowDataProtectionOfficer@glowing.com)) or at the contact details above.

**EU representative.** Our EU representative is VeraSafe Ireland Ltd., North Point Business Park, New Mallow Road, Cork T23AT2P, Ireland. <https://verasafe.com/public-resources/contact-data-protection-representative> (<https://verasafe.com/public-resources/contact-data-protection-representative>) **UK**

**representative.** Our UK representative is VeraSafe United Kingdom Ltd., 37 Albert Embankment, London SE1 7TL, United Kingdom. <https://verasafe.com/public-resources/contact-data-protection-representative> (<https://verasafe.com/public-resources/contact-data-protection-representative>)

**Legal bases for processing.** We use your personal information only as permitted by law. Our legal bases for processing the personal information described in this Privacy Policy are described in the table below.

<b>Processing purpose</b> <i>Details regarding each processing purpose listed below are provided in the section above titled "How we use your personal information".</i>	<b>Legal basis</b>
<b>To operate our services</b>	Processing is necessary to perform the contract governing our provision of our services or to take steps that you request prior to signing up for the services. If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the services you access and request.
<b>For research and development For marketing and advertising For compliance and protection Sharing your personal information as described in this Privacy Policy</b>	These activities constitute our legitimate interests. We do not use your personal information for these 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).
<b>To comply with law</b>	Processing is necessary to comply with our legal obligations.

<p><b>Processing purpose</b>  <i>Details regarding each processing purpose listed below are provided in the section above titled “How we use your personal information”.</i></p>	<p><b>Legal basis</b></p>
<p><b>With your consent</b></p>	<p>Processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or in the services.</p>

**Use for new purposes.** We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

**Sensitive personal information.** If you provide us with any sensitive personal information to us when you use the services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our services. Sensitive information includes information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership

**Your rights.** European data protection laws give you certain rights regarding your personal information. If you are located in Europe, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.

- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by email to [privacy@glowing.com](mailto:privacy@glowing.com) (<mailto:privacy@glowing.com>) or our postal address provided above. We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may contact us or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator at [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en) ([https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en))

**Cross-border data transfer.** If we transfer your personal information from Europe to another country such that we are required to apply appropriate safeguards to your personal information under European data protection laws, we will do so. Please contact us for further information about any such transfers or the specific safeguards applied.