

Privacy Policy

UK & EU version

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1 Introduction

- 1.1 We at Glide respect and are committed to protecting your privacy. This Privacy Policy explains how, where, why and when we use your personal data. This Notice also gives advice of your rights regarding your personal data.
- 1.2 In this Privacy Policy, Glide means any of our Group companies including but not limited to:
 - 1.2.1 **Glide Student & Residential Ltd**, a company registered and incorporated in England and Wales, company number 03188615
 - 1.2.2 **Glide Business Limited**, a company registered and incorporated In England and Wales, company number 06489468
 - 1.2.3 **Velocity1 Limited**, a company registered and incorporated In England and Wales, company number 06240919.
- 1.3 As a Data Controller, we are responsible for the personal information about you that we collect, receive, store, share, transfer and the means under which we process your data. All personal data that we hold about you will be processed in accordance with the UK and EU Data Protection laws including the Data Protection Act 2018 (*DPA 2018*), the UK General Data Protection Regulation (*UK GDPR*), Privacy & Electronic Communications (*EC Directive*) Regulations 2003 (*PECR*), and, the General Data Protection Regulations 2016/679 (*EU GDPR*), the German Federal Data Protection Act (*Bundesdatenschutzgesetz*) (*BDSG*), and any subsequent legislation in each case where applicable.
- 1.4 Please take time to read this Privacy Policy. Please note, Glide may change its Privacy Policy from time to time to reflect how we deliver our products and services so please revisit this Privacy Policy regularly.

2 Key Definitions

Controller Glide is responsible as the Controller of the data that we collect about you. Glide is responsible for the collecting, the determination and the purpose for which and the means by how your personal information is processed.

Processor A third party that processes your data on our behalf subject to the applicable data sharing agreements or provisions within the contracts.

Personal data Personal data is any information relating directly or indirectly to a living individual. This information includes things such as name, address, location data, MAC address, IP address and other online identification factors such as social media identifiers. It also relates to any factors specific to the physical, physiological, genetic, biometric or cultural identifiers of the individuals.

3 Privacy Statement

- 3.1 Glide takes the responsibility for the privacy and security of your personal data very seriously.
- 3.2 This Privacy Policy tells you what to expect when we collect and process your personal data. We will ensure that:
 - 3.2.1 any personal data that is provided to us either directly or via a third party is kept secure
 - 3.2.2 we will apply all the safeguards we need to protect your data – physically and digitally
 - 3.2.3 we collect only the information that we need to provide the service to you
 - 3.2.4 we will limit the access to the data collected, and only individuals that require access to your data will be able to have access to the data
 - 3.2.5 we are clear about the reasons for collecting and processing the data
 - 3.2.6 we will not do anything that you would not expect.
- 3.3 This Privacy Policy outlines:
 - 3.3.1 how we use personal data
 - 3.3.2 what personal data we process
 - 3.3.3 why we need it
 - 3.3.4 who we might share it with
 - 3.3.5 how long we may retain the data for.
- 3.4 You have the right to complain to us, or to the supervisory authority in the UK or EU/EEA country in which you live, work or consider an infringement to have occurred, if you have a concern about how we process your personal data. For UK complaints, you can contact the ICO via www.ico.org.uk. For Germany, this will be the competent German data protection supervisory authority (Datenschutzaufsichtsbehörde), including the relevant federal state (Land) supervisory authority or the Federal Commissioner for Data Protection and Freedom of Information (BfDI), where applicable.
- 3.5 if you have a concern about how we process your personal data and you can do this via www.ico.org.uk.

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

4 What Personal Data do we process?

- 4.1 The personal data that we collect, and process will depend on the services and products that we provide you and our interactions with you. We only collect personal data for clear and specific and legitimate purposes. We will always notify you of any material changes to information we collect or to the purpose that we will collect and process it. We may also receive your personal data from third parties. We explain the different ways that we use your personal data below.

4.2 Cookies

- 4.2.1 Like most companies we use cookies on our website and other tracking technologies to help create a better experience for you when using the website. Cookies allow a website to remember you; they are text files that are stored in the internet browser or by the internet browser when you visit a website on your computer system, details on the cookies we use are set out in our [Cookie Policy](#).

- 4.2.2 For details about how Glide uses cookies and other tracking technologies, please see our [Cookie Policy](#).

4.3 If you register for a Residential, or Student Service

- 4.3.1 During registration or service initiation we ask for some basic information about you to enable us to provide the internet and any additional services. We request your correct name and correct email address to enable us to provide the services. Failure to do so can lead to a disruption in the services we provide.

- 4.3.2 We may collect the following information at registration, during the delivery of our service, or if you contact the service desk:

- (a) Your name
- (b) Your email address
- (c) Your location including address and room/flat numbers
- (d) Telephone number
- (e) Security question and security answers
- (f) Date of Birth
- (g) Social Media identifiers
- (h) MAC address of your devices to evidence which are connected to the service.

- (i) IP address

4.3.3 We use this information to deliver our service and to help us identify and support you, especially should you have reason to contact the service desk.

4.3.4 Where requested by your education or accommodation provider, we may conduct monitoring, web filtering, reporting and proactive alerting. As part of this process, we may process your IP address, account name, email address, URL and denied categories.

4.3.5 If it is necessary to take a payment from you then we will collect the applicable information regarding this as well.

4.4 Information we collect if you work for, or are a guest of, one of our Business Customers

4.4.1 If you work for, or register for guest access provided on behalf of, one of the businesses that receives our services or we have a formal contract with, we may collect the following information:

- (a) Your name
- (b) Your business email address
- (c) Your telephone numbers including mobile number
- (d) Your location
- (e) Information on your job role

4.4.2 We use this information to help us identify and support you, especially should you have reason to contact the service desk.

4.5 Mailing Lists

4.5.1 If you are subscribed to one of our mailing lists Glide will collect the following information to enable us to provide the requested service.

- (a) Your name (first and surname)
- (b) Your company
- (c) Your email address
- (d) Your job title
- (e) Your communication preferences

4.6 Job Applicants

4.6.1 If you apply for a role with Glide, we will collect the following information to enable us to process your application and to provide you with additional information:

- (a) Your Name (first and surname)
- (b) Your contact details (including postal address, email address and contact numbers)
- (c) Other personal data including gender and date of birth
- (d) Special category data including medical or disability information
- (e) Other information that is relevant to processing your application such as qualifications, RTW, and career history and experience

4.6.2 Where we request special category data there is always the option not to provide this.

4.7 **Social Media**

4.7.1 Depending on your settings and privacy policies for social media and messaging service services like Twitter might give us permission to access personal data about you from those accounts or services.

5 **Legal bases for processing your Personal Data**

5.1 Whatever we do with your information we need to have a legal basis for doing it. The legal bases that we normally rely on are:

5.1.1 Legitimate interest

5.1.2 Performance of contract

5.1.3 Consent

5.1.4 Legal obligation

5.1.5 To protect the vital interests of a data subject or another natural person

5.1.6 Public Interest

5.2 **Legitimate Interest:**

5.2.1 We have a legitimate business interest to hold and process your personal data to enable us to perform our genuine business interests. Most individuals would expect us to process their data in this way. When we rely on this lawful basis to process your data, we will have assessed that the use of your data is fair and that our processing would not override your right to privacy.

5.2.2 We rely on the lawful basis for legitimate interest for a number of processes, including but not limited to the following:

- (a) for research purposes and to understand why you joined or left us. For example,

we may conduct customer surveys about the services we provide you

- (b) for access to our website and to ensure that this is an appealing, technically functioning, and user-friendly website and to ensure the security of the website
- (c) to improve our services, in the majority of these incidents we will attempt to use anonymised or aggregated data. For example, we may carry out experiments or pilot projects in relation to location-based services to better understand what value added services we can provide to you and our building operators
- (d) to better understand the efficiency and effectiveness of the use of our services and properties our customers manage, including (without limitation) helping to improve properties to reduce energy costs and, ultimately, carbon emissions.
- (e) to ensure our network and services are kept secure
- (f) to undertake marketing of our products and services
- (g) to manage our agreements and to resolve any disputes relating to it
- (h) to disconnect your service when informed by the accommodation provider due to rent arrears
- (i) to protect our network against cyber attacks
- (j) to defend ourselves in legal disputes
- (k) to record calls for the legitimate business interest of monitoring or training purposes
- (l) to collect information from third parties to generate leads and to further understand the market we operate in
- (m) to manage credit and credit related services.

5.2.3 At industry and trade events we may also collect personal information on people who have either expressed an interest in our services or provided their business card.

5.2.4 We will also use limited company data to understand the commercial viability and market for our services. We may contact you to discuss this and any other services that you might be interested in.

5.3 **Performance of Contract:**

5.3.1 We rely on the lawful grounds of performance of contract for a number of purposes including but not limited to:

- (a) to fulfil our obligations as defined by the contract that we hold with you

- (b) to authorise your access to our network
- (c) to confirm your identity when you call our support team
- (d) to deal with any support issues you raise
- (e) to take and process payments
- (f) to manage our agreements and any disputes that may arise
- (g) to notify you by email when we are undertaking any maintenance that may affect the service, we provide
- (h) to administer and provide the services contracted
- (i) when we are preparing and carrying out service reviews
- (j) as part of the management of procurement and finance including credit control
- (k) to manage our contracts with the applicable companies and to respond to any complaints or queries relating to the contractual relationship
- (l) to confirm your identification when you call our support team
- (m) to deal with support issues you raise
- (n) to take and process payments

5.4 Legal Obligation:

5.4.1 We rely on the lawful ground of a legal obligation to:

- (a) comply with any legal or regulatory obligations (such as to contact you when you are nearing the end of your fixed term contract with us or to demonstrate we have billed you and dealt with any complaints correctly).
- (b) comply with any legal proceedings
- (c) comply with any requests from law enforcement agencies, including the police and other government bodies.

5.4.2 We may share personal data when the disclosure of the data will meet applicable laws, regulations or legal processes. We may also disclose this information when detecting, preventing or addressing fraudulent activities and other types of security issues. Where relevant, this information may be shared with regulatory bodies, credit reference agencies Police, social services and other organisations that we may deem necessary on the circumstances.

5.5 Vital Interests:

5.5.1 We may in exceptional circumstances rely on the lawful grounds of protection of vital interests of the data subject or another natural person.

5.6 Public Interest:

5.6.1 We may occasionally rely on the lawful grounds of Public Interest, where for the benefit of the public we need to process your personal data. Examples of this include where the processing is necessary for humanitarian purposes, including the monitoring of epidemics.

5.7 Consent:

5.7.1 We may rely on consent for direct marketing purposes, for example to call you about offers regarding our products or to send you emails about promotions on our services.

5.7.2 You can withdraw your consent at any time as outlined below under 'Direct Marketing'.

6 How we Collect Information

6.1 We may collect this information:

6.1.1 directly from you using online registration forms or telephone calls. Please note, we record incoming and outgoing telephone calls.

6.1.2 indirectly by your use of our services and websites.

6.1.3 from your accommodation provider, employer, or other third parties as applicable.

6.2 We may collect your information in the form of CCTV images or photographs. CCTV is only used for the prevention, detecting and investigation of unauthorised activities on our premises. The footage will be reviewed in accordance with any investigation. Images of individuals in the normal course of events will be automatically written over after a period of 30 days.

6.3 We use smart cameras for counting footfall entry/exit of our building and dwell times. These cameras count individuals as a coloured object. In some circumstances, if there is a detection of unusual patterns such as large volumes of footfall and dwell times, these cameras may switch to image capture, where you may be identifiable.

7 Sharing of Information

7.1 We may need to share some of your personal data with other parties, such as our suppliers or third parties. These third parties will have signed confirming that they will adhere to the UK GDPR and DPA 2018 (and EU GDPR where appropriate), and have the appropriate security training and safeguards in place to protect your personal data.

7.2 Where we employ other companies and individuals to perform functions on our behalf, we will

ensure that they are risk assessed and subject to written agreements with us stating how they can use your information. We ensure that they are compliant with applicable data protection laws and regularly audit their processes.

7.3 Third parties we may share data with include (without limitation):

7.3.1 other trusted businesses or persons to process information or perform functions on our behalf, based on our instructions and in compliance with this notice and other security measures.

7.3.2 payment providers (eg Sage Pay, Worldpay and Stripe) to process our payments

7.3.3 other utility suppliers to allow us to transfer your services (if applicable)

7.3.4 with organisations that may be able to help you – If we believe that you (or a member of your household) need extra care (for example, because of your age, health, disability or financial circumstances), we may record and share this information with social services, charities, health care and other support organisations, if we believe at any time that they may be able to help you or the other members of your household

7.3.5 potential buyers of some or all of our business or on a re-structuring (where possible, personal data will be anonymised)

7.3.6 Government bodies as defined by law or other regulations, including but not limited to the Police, HMRC, NHS, Public Health England

7.3.7 your employer or your accommodation provider (where they are our customer)

7.3.8 Credit Reference and Fraud Prevention Agencies.

7.4 If you are a student or residential customer, we may share your name, and location, with your accommodation provider in relation to any open or closed support tickets. We may also share these details with them if we anticipate that your service experience is impacted by something and we are unable to reach you. This is so that your accommodation provider can also contact you to help us ensure that you receive a good service and the appropriate support to resolve these issues. We may also share pseudonymised information on your usage with your accommodation provider if there is a legitimate business reason to do so. We may also share your information with your accommodation provider if required to do so as part of the contractual agreements, such as information in relation to monitoring reports and alerts.

8 Credit Reference and Fraud Prevention Agencies

8.1 If you are a consumer, when you join Glide, we may check your details with one or more credit reference and fraud prevention agencies to help us decide whether there is a risk that you may

not pay your bills and also to help us make decisions about the goods and services we can offer you. We may search at credit reference and fraud prevention agencies for information about you and all the people you are applying with. If you are providing information about other people on a joint application, you must make sure they agree that we can use their information to do this.

- 8.2 If you give us false or inaccurate information and we suspect fraud, we will pass your details to credit reference and fraud prevention agencies. Law enforcement agencies (such as the police and HM Revenue & Customs) may receive and use this information.
- 8.3 We may also see and use information about you that the credit reference and fraud prevention agencies provide to:
- (a) check details on applications you make for credit and credit-related services
 - (b) check your identity
 - (c) prevent and detect fraud and money laundering
 - (d) manage credit and credit-related accounts or services
 - (e) recover debt
 - (f) check details on proposals and claims for all types of insurance
 - (g) check details of employees and people applying for jobs with us
- 8.4 When credit reference agencies receive a search from us, this may be recorded on your credit file whether your application is successful or not.
- 8.5 If you have an account with us, we may give details of it and how you manage it to credit reference agencies. If you have an account and do not repay money you owe in full or on time, credit reference agencies will record this debt. They may give this information to other organisations and fraud prevention agencies to carry out similar checks, find out where you are and deal with any money you owe. The credit reference agencies keep records for six years after your account has been closed, you have paid the debt or action has been taken against you to recover the debt.
- 8.6 We may see and use information from other countries that is recorded by fraud prevention agencies.
- 8.7 If you want to see what information credit reference and fraud prevention agencies hold about you, you can contact the following agencies in the UK. The information they hold may not be the same, so it is worth contacting them all.
- (a) www.callcredit.co.uk

- (b) www.experian.co.uk
- (c) www.creditserve.co.uk

9 Profiling/creating of aggregated and anonymised data

- 9.1 Occasionally we may use your personal information to create aggregated and anonymised information. Nobody can identify you from that information and we'll use it to:
- (a) Make sure our network is working properly, and continuously improve and develop our network and products and services for our customers
 - (b) Provide other organisations with aggregated and anonymised reports.
- 9.2 We have a legitimate interest in generating insights that will help us operate our network and business or would be useful to other organisations.

10 Where your information may be held and any security and sharing of personal data outside the UK or EU/EEA

- 10.1 Information may be held at our offices and those of our group companies, and third-party agencies, service providers, representatives and agents as described above.
- 10.2 We ensure that appropriate security measures are in place when handling your personal data.
- 10.3 Your personal information may be transferred to and processed outside of the UK/EEA. This is because the organisations we use to support us to provide our services to you may be based outside the UK or EU/EEA and/or have servers based outside the UK or EU/EEA.
- 10.4 We will only transfer your personal information from countries in the UK or EU/EEA to countries outside of the UK or EU/EEA where:
- 10.4.1 the transfer is to a country (or an international organisation) that the UK government/European Commission has determined ensures an adequate level of protection ("Adequacy");
 - 10.4.2 an International Data Transfer Agreement (IDTA) or Standard Contractual Clauses adopted by the UK Government or European Commission (whichever is applicable) have been put in place between the entity in the UK or EU/EEA and the entity located outside the UK or EU/EEA;
 - 10.4.3 binding corporate rules have been implemented, where applicable;
 - 10.4.4 when transferring your Personal Data to America, we may rely on the EU-US Data Privacy Framework, where appropriate; or where

10.4.5 the transfer is otherwise permitted by the law.

11 How long we keep your information

- 11.1 We only retain your personal information for as long as is necessary or in accordance with our legal or regulatory obligations. Wherever possible we will obfuscate the data to ensure that we always minimise the information that we store.
- 11.2 If you are a residential or student customer, we will retain your data for the duration of the contractual relationship. We will retain your personal data including financial records for a period of 6 years after the termination of the contract.
- 11.3 We retain your data for the following reasons:
- 11.3.1 allow us to complete financial audits
 - 11.3.2 to identify returning customers
 - 11.3.3 to enable us to analyse product and trend analysis
 - 11.3.4 to meet and demonstrate our compliance with our legal and regulatory obligations
 - 11.3.5 to ensure that we can defend and manage any legal claims
- 11.4 We retain payment records for 6 years after the financial year that the transaction has occurred. We hold the financial information for the auditing purposes. We only retain your customer account number and the information that is necessary for us to defend and manage any legal claims or disputes in respect of those payments.
- 11.5 If you work for one of our corporate customers that we will retain your data whilst we manage your account and for the retention period of normally 6 years post termination of any contractual agreements, unless otherwise stipulated within the contract.
- 11.6 If you have enquired about our services or are a prospective customer, we will have taken some of your personal details whilst we deal with your enquiry. We will retain your details for 12 months unless you enter into a contract with us in the interim. If you do not want to be contacted about our services during this period then you have the right to opt out of marketing communications.
- 11.7 Where we need to hold information for longer, we will only hold what is necessary to fulfil our obligations.

12 Your rights

- 12.1 You have a number of important rights under the applicable data protection legislation. When you request to exercise one of those rights, we may ask for confirmation of your identity. This is

just another way in which we are protecting your personal data.

12.2 You have the following rights over your personal data:

- 12.2.1 the right to request access to your personal data free of charge, unless the request is unfounded or excessive
- 12.2.2 the right to request correction of your personal data if it is inaccurate or incomplete
- 12.2.3 to have your personal data deleted or removed where there is no good reason for processing to continue.
- 12.2.4 to withdraw your consent where you have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you may withdraw your consent for that specific processing at any time.
- 12.2.5 for the Processing of your data to be restricted, subject to certain criteria.
- 12.2.6 to object to processing of your personal data where we are relying on a legitimate interest to process your personal data.
- 12.2.7 to object to automated decision making and profiling which have legal effects or similarly significant effects.
- 12.2.8 to request your data is moved, copied or transferred to another platform subject to certain criteria

12.3 We have one calendar month to respond to these requests. In some circumstances we may require an extension to this time frame up to 2 further months. In some circumstances we may refuse your request under your data rights. We will inform you of the reasons for our refusal.

12.4 Please contact our Data Protection Officer (DPO) should you want further information on any of your rights.

13 Direct Marketing

13.1 You have the right to object to us processing your personal data for direct marketing purposes. If you would like to stop receiving our marketing communications, please contact us on dpo@glide.co.uk.

14 How to complain

14.1 You have the right to complain if you consider that we have not complied with the data protection law when handling your personal data. We will acknowledge receipt of your complaint within 30 days, investigate the matter without undue delay, and keep you informed of the progress and outcome. If you wish to complain to us, please contact:

14.2 In the UK: Data Protection Officer

DPO@glide.co.uk

c/o Glide, Alpha Tower, Suffolk Street Queensway, Birmingham, West Midlands, England,
B1 1TT

In the EU/EEA: Data Protection Officer

DPO@glide.co.uk

c/o Glide Student & Residential Ltd Dutch branch, Gustav Mahlerplein 2, 1082 MA
Amsterdam

14.3 We trust that our Data Protection Officer can resolve any query or concern that you may raise about the use of your information. If not, for UK matters, please contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint. For EU/EEA matters, including Germany, you may contact your local supervisory authority.

14.4 For supervisory authorities in other countries within the EU/EEA, including the German supervisory authorities, see the links below:

https://edpb.europa.eu/about-edpb/about-edpb/members_en

<https://www.datenschutzkonferenz-online.de/datenschutzaufsichtsbehoerden.html>