

Gartner Ethics Helpline Privacy Notice

At Gartner we take the protection of your personal data seriously. This privacy notice (the “**Notice**”) contains important information on the way your personal data will be processed when reporting a concern through the Gartner Ethics Helpline (either via telephone or the web portal). Please read this Notice carefully before proceeding.

Where permitted by law, you can choose to make a report anonymously. With our principle of non-retaliation, we encourage you to identify yourself when making a report. If you wish to report anonymously, you should not include information that may personally identify you.

You may contact Gartner at Ombuds@gartner.com with any questions about the Gartner Ethics Helpline, or to exercise any rights you may have concerning your personal data (subject to applicable data protection laws).

The Gartner Ethics Helpline is a web and phone-based intake system provided by Gartner, for the purposes of reporting specific violations of the [Gartner Code of Conduct](#). The Gartner Ethics Helpline is operated by NAVEX Global, Inc., a company incorporated in the United States (“NAVEX”). For the purpose of applicable EU data protection laws, Gartner Inc. and its subsidiaries will be the data controllers, and NAVEX is the data processor.

Any personal data that you submit or report through the Gartner Ethics Helpline will be processed by Gartner for its legitimate interests, to ensure that Gartner’s business is conducted with integrity, in line with its Code of Conduct, and to comply with applicable local legal obligations.

Any personal data you provide will be stored by NAVEX in the United States and will be accessible by Gartner. NAVEX has entered into a contract with Gartner to protect and secure your data in accordance with applicable law. With respect to the additional legal obligations applying to personal data originating from the European Union, Gartner has in place EU Standard Contractual Clauses with NAVEX to ensure your personal data is protected when it is transferred outside the EU.

What data is collected and processed?

Personal data will be collected and processed for the purposes of investigating reports. The Gartner Ethics Helpline captures the following personal data that you choose to provide when making a report: (i) your name and contact details (unless you report anonymously); (ii) the name and other personal data of the persons you name in your report if you provide such data (i.e.: description of functions and contact details); and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident.

Will my data be kept confidential?

The data you submit will be treated confidentially and we encourage you to identify yourself by your name in order for us to follow up with questions we may have. Our ability to communicate with you will help with any investigation that may take place. If you do not want to provide your name, you have the right to be anonymous (where this is legally permitted in your jurisdiction). However, please be aware that you may become identifiable based on the data you provide or any investigation into the facts by Gartner.

How will my data be used?

Gartner will evaluate the data you provide through the Gartner Ethics Helpline and may conduct an investigation. The data will be reviewed and disclosed to persons to whom Gartner considers it appropriate and necessary to share data, or is requested to do so by law, including cooperation with regulatory authorities. An investigation may be managed internally, using Gartner employees (e.g., in the Legal, Audit, Compliance or HR departments) or referred to appropriate external third parties, such as auditors, investigators or advisers. If an investigation indicates that a violation of company policy or applicable laws or regulations has occurred, Gartner will take such action as it determines appropriate in the circumstances, which may include reporting matters to the police or regulatory or other authorities.

Changes to this Notice

From time to time, we may change and/or update this Notice. If this Notice changes in any way, we will post an updated version on the Gartner Ethics Helpline portal and the [Gartner Policies site](#) on Gartner.com. We recommend you regularly review this Notice to ensure that you are always aware of our information practices and any changes to such.

Date: July 2021