

THE 652-DAY GAP

HubSpot's August 4 enrichment sharing change, documented from HubSpot's own pages

ID: BTI-2026-0001

CODES: BTI-X02 · BTI-X04 · BTI-X11

PUBLISHED: 2026-07-02

TL;DR

On July 2, 2026, HubSpot emailed Super Admins of accounts that use enrichment: starting August 4, enrichment data "such as business contact details, employer information, and email deliverability signals, may be shared with other customers."

We pulled the paper trail. The authorization to copy customer-transmitted enrichment data into HubSpot's commercial dataset has been in the Product Specific Terms since September 18, 2024. The plain-language announcement arrived July 2, 2026. That is **652 days**.

For part of that window, HubSpot's own help documentation stated the opposite: "HubSpot won't share the data listed above with other accounts." That sentence was live through at least February 9, 2025, and was removed by April 4, 2025.

And the "complete control" the notice promises does not include a sharing control. There are five enrichment toggles. All five govern whether your records receive enrichment. None governs whether your data is contributed or shared. The only exits HubSpot's own email offers are an AI-training toggle (a different data flow) and not using the feature at all.

One more pair of dates. On July 1, 2026, the Product Specific Terms gained the authorization to "supplement the data sets of other customers." On July 1, 2026, HubSpot's AI model training help article stated: "Data is never shared between HubSpot users or accounts." Both sentences are HubSpot's. Both carry the same date.

Every claim above is a quote, a date, and a link. Check them yourself in the Verify Everything table at the end.

THE NOTICE

From the July 2, 2026 email, "Review your Data Enrichment Settings before August 4," sent by The HubSpot Product Team to Super Admins (evidence artifact on file; tracking links stripped and not followed):

"On August 4, 2026, HubSpot is expanding its data discovery and intelligence features to bring more robust and reliable data to our customers. To power these tools, enrichment data such as business contact details, employer information, and email deliverability signals, may be shared with other customers."

"As always, you have complete control over your settings. You can review or modify your Data Enrichment settings any time. To ensure your data is not collected and shared by HubSpot moving forward, you can opt out of your data being used for AI model training and stop using enrichment features before August 4. To turn off automatic enrichment, simply ensure your settings are 'OFF'."

Read that second paragraph again. The sentence that promises complete control is immediately followed by the complete list of controls: an AI model training toggle, and stopping use of the feature. That is the entire menu. We verified this against the published settings documentation (The Control Surface, below).

THE TIMELINE

Every entry is sourced to a live page or a Wayback Machine snapshot you can open today.

JUN 4, 2024

PST · Wayback 2024-09-15

"Enrichment Data does not include Personal Data. We do not use Customer Data to populate Enrichment Data."

SEP 18, 2024

PST §6.5.4 · Wayback
2024-10-09

The Breeze-era terms replace that sentence with a contribution authorization:

"by using the enrichment products, you agree that only the Enrichment Data you transmit to HubSpot via the Subscription Services may be copied to our commercial dataset and processed further as HubSpot Content"

...noting this "supersedes any prior or conflicting terms." The Data Processing Agreement adds Controller-to-Controller terms for enrichment the same day. **The 652-day clock starts here.**

JAN-FEB 2025

KB · Wayback 2025-01-15,
2025-02-09

Four months after the terms authorized contribution, the help center states:

"HubSpot won't share the data listed above with other accounts."

FEB-APR 2025

KB · Wayback 2025-04-04

The "won't share" sentence is removed. Replacement: "HubSpot may use enrichment data as confirming signals to verify information in the Breeze Intelligence commercial dataset." That phrasing holds through at least the January 23, 2026 snapshot. No sharing language in either direction for roughly fifteen months.

JUL 1, 2026

ToS, PST, DPA, Privacy Policy
+ 4 KB articles

All revised the same day. The PST now reads:

"6.3.1 HubSpot's Authorization. You agree we may: (i) add Enrichment Data to our commercial dataset and use it to enrich or otherwise supplement the data sets of other customers"

JUL 2, 2026

Notice email

The notice lands: enrichment data "may be shared with other customers."

AUG 4, 2026

Effective date

The change takes effect.

WHAT "ENRICHMENT DATA" MEANS IN THE TERMS

The definition is broader than the email's three examples. PST §6.2 (July 1, 2026):

"(i) Contact data, including Personal Data such as business contact information, employer information, and other professional data; (ii) company data, including company domain, industry, size, location, and other data reflecting the entity; or (iii) data collected through HubSpot Tracking Code, including

visitor and traffic data, such as IP addresses and other online identifiers ((i) - (iii), together with Email Engagement Data (as defined below), collectively, 'Enrichment Data')."

The knowledge base FAQ lists the flows HubSpot ingests from: Contact Enrichment, Company Enrichment, and "Buyer Intent, powered by the HubSpot Tracking Code." The tracking-code lane means website visitor signals (visitor IDs, IP addresses, page paths) collected on your site are in scope, and the Privacy Policy states HubSpot processes tracking-code data "for our own purposes as a controller."

Contributed data also changes ownership category. PST §6.3.2: the commercial dataset and enrichment outputs "are HubSpot Content." The Terms of Service definition of HubSpot Content now expressly includes Enrichment Data, and: "We retain all intellectual property rights to the HubSpot Content."

THE CONTROL SURFACE, VERIFIED

The "Manage data enrichment settings" article (July 1, 2026) documents five controls. Exact labels:

1. "Automatically enrich new records"
2. "Continuously enrich existing records"
3. "Overwrite incorrect enrichment values"
4. "Automatically enrich recently engaged contacts and companies"
5. "Opt out of free company name enrichment"

All five control whether and how your records receive enrichment. None mentions contribution to the commercial dataset. None mentions sharing with other customers. The article's only pointer beyond these is:

"To opt out of HubSpot using your data to help determine email deliverability, toggle the AI Model Training switch off in your AI settings."

The terms say the same thing in legal register. PST §6.3.3: "You can opt out of how HubSpot collects and uses Enrichment Data by updating your settings in your HubSpot account." The settings that exist are feature-level. There is no sharing-level setting documented anywhere we could find.

Three related facts, recorded as we found them:

- **Default state: unresolved.** No HubSpot page we could locate states whether automatic or continuous enrichment is on or off for new accounts. The July 2 email's instruction, "To turn off automatic enrichment, simply ensure your settings are 'OFF'," is the closest statement on record. The PST notes separately that "Some HubSpot AI settings may be on by default."
- **No take-backs documented.** We found no mechanism for a customer to withdraw data their account has already contributed to the commercial dataset. Every documented removal path belongs to the individual contact, who must file HubSpot's privacy form personally. Per HubSpot's FAQ, "If the individual withdraws their deletion request or re-consents, their data may be reintroduced into HubSpot's enrichment dataset in the future."
- **Contribution crosses account lines.** HubSpot's FAQ: "A contact may receive a notice from HubSpot about their data in HubSpot's commercial dataset even if your account is not using enrichment products," because another customer enriched the same contact.

One more artifact, dated the same July 1: HubSpot's "Opt out of HubSpot's AI model training" article states, "Data is never shared between HubSpot users or accounts." That sentence sits in the AI-training article. The Product Specific Terms revised the same day authorize supplementing "the data sets of other customers." Both sentences are HubSpot's. We present them side by side and leave them there.

WHO CARRIES THE RESPONSIBILITY

The terms answer this directly. PST §6.4 (July 1, 2026):

“You acknowledge and agree that you will be solely responsible for providing adequate notices, obtaining any necessary consents and authorizations, and honoring opt-out preferences to collect and transmit Enrichment Data to HubSpot and for HubSpot to use such Enrichment Data as contemplated by this Agreement.”

The DPA’s Controller-to-Controller section (in place since September 18, 2024) adds:

“nothing in the Agreement or this ‘Controller-to-Controller Terms’ section shall restrict HubSpot in any way from collecting, using, or sharing data that HubSpot would otherwise Process independently of Customer’s use of the Subscription Services, including our enrichment features.”

“Customer agrees to delete enrichment outputs if Customer determines that Customer does not have any independent lawful basis (or substantively similar terms) for Processing such data under Data Protection Laws.”

For contacts in Europe, HubSpot’s July 1 documentation states it emails individuals “a privacy notice with information required under Article 14 of the General Data Protection Regulation (GDPR),” including “the fact that HubSpot shares that data with customers.” That Article 14 citation appears in the July 1, 2026 version of the page. It is absent from the February 15 and May 21, 2026 snapshots of the same page.

This behavior pattern is addressed under GDPR Art. 14, Art. 6(1)(f), and the controller and processor definitions of Art. 4; HubSpot’s own pages reference GDPR and CCPA. Determinations about any of it belong to your own advisors, not to us and not to a product notice.

BEFORE AUGUST 4: WHAT TO REVIEW

We do not tell you what to decide. Here is what to look at, in order.

- Find out if you are in scope.** The notice went to Super Admins of accounts that “have used HubSpot’s enrichment features.” Ingestion flows are Contact Enrichment, Company Enrichment, and Buyer Intent via the HubSpot Tracking Code.
- Open Settings > Data Management > Data Enrichment.** Record what is ON. The five toggles above are the whole control surface; there is no sharing-specific switch to look for.
- Understand what each choice does and does not do.** Turning toggles off stops enrichment behavior going forward. The AI Model Training toggle governs a different flow. Nothing documented retrieves what your account has already contributed.
- Inventory what your tracking code feeds.** Buyer intent runs on visitor signals from your own website: visitor IDs, IP addresses, page paths. Those are in the Enrichment Data definition.
- Read PST §6, the DPA’s Controller-to-Controller section, and Privacy Policy §1.5, §1.6, and §3.10 yourself.** They are short. Every quote in this advisory cites its source, and the Wayback snapshots let you read every prior version.
- Decide with your own advisors.** The notices, consents, and opt-out obligations in PST §6.4 sit with you by contract. What that requires in your situation is a question for your team.

VERIFY EVERYTHING

We publish evidence, not assertions. Raw HTML of every source page was captured on July 2, 2026, hashed with SHA-256, and preserved with fetch timestamps.

Claim	Source
“We do not use Customer Data to populate Enrichment Data”	web.archive.org/web/20240915171227/ legal.hubspot.com/product-specific-terms

Claim	Source
"copied to our commercial dataset" (Sept 2024 terms)	web.archive.org/web/20241009065155/ legal.hubspot.com/product-specific-terms
"HubSpot won't share the data listed above with other accounts"	web.archive.org/web/20250115070044/ knowledge.hubspot.com/ai-tools/get-started-using-breeze-intelligence (also 20250209005811)
"Won't share" removed; "confirming signals" added	web.archive.org/web/20250404124147/ (same URL)
No sharing language as late as Jan 2026	web.archive.org/web/20260123182350/ (same URL)
No sharing clause in PST as late as the Apr 14, 2026 version	web.archive.org/web/20260603222857/ legal.hubspot.com/product-specific-terms
Article 14 citation absent in Feb and May 2026 page versions	web.archive.org/web/20260215164816/ and /20260521042226/ knowledge.hubspot.com/records/understand-opt-out-notices-for-hub-spots-enrichment-dataset
Current versions of all quoted pages	legal.hubspot.com: product-specific-terms · dpa · privacy-policy · terms-of-service; knowledge.hubspot.com articles cited inline

Date convention. The 652-day figure runs from the Product Specific Terms version date (September 18, 2024, as printed on the document) to the notice email (July 2, 2026). The earliest Wayback snapshot of that version is October 9, 2024. Snapshot dates record when the Internet Archive crawled a page; every snapshot date in this advisory is therefore a lower bound on how early the language existed, not the date the language took effect.

Methodology note. The links inside HubSpot's notice email are recipient-keyed click trackers (hubspot.com/e3t/Ctc/...). We did not follow them. Every source in this advisory was pulled cold from the canonical URL. The email also carries a 1x1 open-tracking pixel; it was not loaded.

APPENDIX: RUNTIME OBSERVATIONS

BLACKOUT's scanner records the third-party code that loads on a page. For completeness, the observations for www.hubspot.com are on file: 18 third-party vendors observed on February 25, 2026 (scan SCAN-1771982329688); a July 2, 2026 verification scan observed, among others, DoubleClick, Google Ads, Google Tag Manager, Google Analytics 4, LinkedIn Ads, X (Twitter) Pixel, Bing Ads, and Mountain on the homepage. Full HAR captures, payload hashes, and timestamps are preserved. These are observations of what loads, offered without scoring; readers can weigh them alongside the documentary record above.

BLACKOUT observes runtime GTM behavior and documents what vendors declare against what their terms and systems do. Scan artifacts and capture hashes are on file. · deployblackout.com