**Privacy Policy**

Zenny AB

Zenny AB (“We,” “Our,” “Us”) is committed to protecting the privacy of its users and the individuals using the Zenny Solution. The following policy outlines how we handle your personal data.

*This privacy policy was last reviewed on July 7th, 2025*

1. **Data Collection and Use**

We collect information about you if you have entered into, or wish to enter into, an agreement with us. This may be in your capacity as a customer, signatory, contact person, or beneficial owner. We collect and use personal data from our solution’s users in accordance with the applicable data protection legislation, including lawful purposes relating to customer relationship management, service provision, credit assessment and billing. This data includes:

* Personal information you actively provide when registering for our solution, such as name, physical address, email addresses, employer, personal identification number, identification documents.
* Information from APIs you have connected to our solution, with data related to your web shop, accounting, and banking activities.
* Information from third parties related to the services of Zenny, and data related to the use of the solution.
* Information required for basic customer due diligence and anti-money laundering measures.
* Information from sanctions lists and lists of so-called politically exposed persons, including data such as name, date of birth, place of birth, occupation or position, and the reason the individual appears on the respective list.
* Other information that you actively provide in response to forms, questionnaires, and transaction inquiries.
* Data collected from the integrations you have actively consented.
* We do not collect or process sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership) other than in connection with sanctions checks.

We process personal information collected via our services for the purposes of:

* Performance of a contract
	+ Providing our services, including to grant advances and provide customer service;
	+ Billing and order fulfillment;
	+ Notifying you about enhancements to our services, including new features and products;
* Compliance with a legal obligation
	+ Complying with the requirements of accounting legislation, anti-money laundering legislation and to screen personal data against sanctions lists that we are legally or regulatorily required to apply; and
* Legitimate interests
	+ Ensuring content from our site is presented in the most effective manner for you and your device
* Conducting market research, When you have given consent.

**Use of User Data for Machine Learning Model Training**

In our pursuit of continuous improvement and innovation, we may harness user data to elevate the performance and capabilities of our web solution’s machine learning models. We want to assure you that before any processing occurs, all user data used for this purpose will undergo a thorough anonymization process. This stringent practice involves removing or transforming any personally identifiable information in such a way that it becomes impossible to trace back to individual users or their associated companies.

**Google, Meta, and TikTok Ads API Data Usage**

We utilize the Google Ads API, Meta Ads API, and TikTok Ads API to display advertising data such as ad spend, impressions, clicks, and other related metrics. This data is used to provide you with insights into the performance of your advertising campaigns and to help you make informed business decisions.

Key Points:

* Data Collection: We retrieve and display data from the Google Ads API, Meta Ads API, and TikTok Ads API. This includes metrics like ad spend, impressions, clicks, conversions, and other campaign performance details. We do not modify, update, or create any data or campaigns through these APIs.
* Purpose: The primary purpose of using these APIs is to present you with comprehensive reports and insights into your advertising efforts across platforms. Additionally, we may use this data to seek feedback and recommendations from AI services (e.g., Google AI) on how you can improve your business strategies based on the performance data.
* Data Sharing:
	+ Internal Use: The data retrieved via the Google, Meta, and TikTok Ads APIs is used within our platform to provide you with relevant information and business insights.
	+ Consultation with AI Services: We may share anonymous or aggregate data with AI services such as Google AI to obtain feedback, ideas, and recommendations to help improve your business performance. This sharing is done without including personally identifiable information, unless explicitly authorized by you.
	+ Legal Compliance: We do not share your data with any third parties outside of these AI consultation services, except as required by law or as necessary to comply with the API providers’ policies.
* Data Security: All data accessed through these APIs is handled with strict security measures to protect your privacy. Only authorized personnel have access to this data, which is stored securely within our systems.
* No Data Modification: We do not use the Google, Meta, or TikTok Ads APIs to modify, update, or influence your advertising campaigns in any way. Our use of these APIs is strictly for reporting and analysis purposes.

Your Rights and Choices:

You retain full control over your Google, Meta, and TikTok advertising accounts and campaigns. Our use of these APIs and consultation with AI services is designed to enhance your business insights without impacting your ability to manage or modify your advertising activities directly through these platforms.

**2. Data Retention**

We retain personal data for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

**3. Disclosure and Transfer of Personal Information**

We do not sell your personal information to third parties. We may engage service providers to process personal information or transfer such personal information to third parties to the extent such transfers are reasonably necessary for the business purposes of Zenny Solution.

**4. Security**

We take appropriate technical and organizational measures against unauthorized or unlawful processing of your personal information and against accidental loss, destruction or damage. However, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk.

**5. Cookie Policy**

What are cookies?

As is common practice with almost all professional websites, this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience.

How we use cookies:

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases, there are no industry-standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

The cookies we set will:

* Enable basic for you to be able to use our website
* Help us understand how you use our website
* Help us work with partners to serve you relevant advertising

Disabling Cookies:

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore it is recommended that you do not disable cookies.

Third-Party Cookies:

In some special cases, we also use cookies provided by trusted third parties. These help us understand how you interact with our website and enable us to monitor user behavior over time and across multiple websites. This information can be used to build profiles and personalize content/advertising. These cookies may be set when you visit our site, or they may be set by a script or tag that is included in our site.

**6. Your Rights**

Under the General Data Protection Regulation (2016/679), you have rights regarding your personal data including:

* Right of access to your personal data
* Right to request us to rectify incomplete or incorrect personal data
* Right to object to or restrict the processing of personal data and to object to automated decision-making
* Right to request us to erase personal data
* Right to transfer personal data to another controller

**7. Contact**

If you have any questions about this Privacy Policy or wish to exercise your rights, please contact us at info@zenny.ai.

**8. Changes to This Policy**

We may update our Privacy Policy from time to time. If any change materially reduces your rights or our obligations under this Policy, we will post a prominent notice notifying users when it is updated.