

TeemantSoft

Privacy Policy for Users in

the European Economic

Area (EEA), United

Kingdom, and

Switzerland”

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1. Introduction

This Privacy Policy applies if you reside in the European Economic Area (EEA), Switzerland, or the United Kingdom. If you reside outside of these areas, a modified version of our Privacy Policy may apply depending on your region.

At TteamSoft, we respect your privacy and are firmly committed to ensuring the security of the information we collect from or about you. This Privacy Policy describes our practices regarding the Personal Data we collect when you interact with our platform, applications, and services (collectively, the “Services”).

Please note that this Privacy Policy does not apply to content we process on behalf of our customers using specific offerings, such as our APIs integrated with third-party services. Our use of this data is governed by the contractual agreements with these customers and applicable local regulations.

For additional information on how we collect and use learning data to improve our services and language models, and the choices you have regarding this information, please see our data protection documentation.

2. Personal Data collected

At TteamantSoft, we collect and process different categories of personal data to provide our services, optimize user experience, and ensure compliance of our platform. Here are the types of data we collect:

2.1. Information related to the Administrative Account

- **Administrative Users**(Administrators, Bot Builders, Bot Managers): We collect information such as first name, last name, phone number, email address and language setting (locale) to create and manage administrative accounts on the TteamantSoft platform.
- **Bot Users**: For end users of the platform, we collect the same basic information (first name, last name, phone number, email address and local address) whether provided directly or by the client company using TteamantSoft.

2.2. Transcripts of Conversations with Gemma

- **Conversations**: We record conversations between users and Gemma, our virtual assistant, to ensure the proper functioning of the services, manage customer support, and to improve the platform.
- **Sensitive Data in Conversations**: In some cases, customers may request personal or sensitive information through Gemma, such as first and last names, emergency contacts, or medical information in the event of an accident. TteamantSoft limits the collection of such data and encourages customers to collect only the information they need.
 - **Protective Measures**: TteamantSoft uses anonymization and pseudonymization practices where possible to protect user privacy. Customers are responsible for obtaining explicit consent from users when collecting sensitive information.

2.3. Communication Related Information

If you contact us via email, customer support, or other means, we collect the information you provide (name, contact information, and message content) to respond to your inquiries, provide support, and improve our services.

2.4. Technical Information Collected Automatically

When you use or interact with the TteamantSoft platform, we automatically collect certain technical data:

- **Connection Data:** We collect information such as IP address, browser type and version, date and time of your access and your time zone.
- **Device Information and Cookies:** We collect information about device name, operating system, and device identifiers, as well as cookie data to facilitate login and improve your browsing experience. For more details, see our Cookie Policy.

2.5. Third Party Personal Data

As part of certain specific processes or interactions, our customers may collect, via TeemantSoft, personal data concerning third parties (e.g., emergency contacts, medical information). TeemantSoft recommends that its customers ensure that they obtain prior consent from any person whose data is collected, in accordance with the requirements of the GDPR.

2.6. Processing of Data by Third Parties

To provide certain features and improve our Services, TeemantSoft uses third-party partner services, each of which has its own GDPR compliance commitments.

To provide enhanced functionality and a quality user experience, TeemantSoft collaborates with several third-party partners for the processing of certain data, each of which adheres to rigorous GDPR compliance standards.

2.6.1. OpenAI (Artificial Intelligence API)

TeemantSoft uses OpenAI services to operate Gemma, our virtual assistant.

Data processed by OpenAI: User interactions with Gemma may be sent to OpenAI to generate responses. These interactions are handled in accordance with OpenAI's privacy policy.

For more information, see the [OpenAI Privacy Policy](#), Chapter 1.

<https://openai.com/policies/eu-privacy-policy/>

2.6.2. Mistral AI (Artificial Intelligence API)

TeemantSoft uses Mistral AI services in addition to OpenAI for certain natural language processing functionalities.

Data processed by Mistral AI: Messages sent by users in certain conversation scenarios can be shared with Mistral AI to generate relevant responses.

For more information, see Mistral AI's privacy policy,
<https://mistral.ai/static/doc/fr-politique-de-confidentialite.pdf>

2.6.3. Infobip (Multichannel Messaging APIs)

TteamantSoft uses Infobip to facilitate multi-channel communications, including those via WhatsApp.

Data processed by Infobip: Phone numbers and messages sent by users are transmitted through Infobip to ensure smooth and secure exchanges. Infobip's privacy policy provides additional details.

More details are available at this link,

<https://www.infobip.com/overview-of-our-key-privacy-practices>

2.6.4. Meta WhatsApp Business (Communication Channel)

Communication services via WhatsApp are provided by Meta WhatsApp Business.

Data processed by WhatsApp: Messages and metadata from conversations on WhatsApp may be processed by Meta in accordance with established security and privacy practices. You can find more information in WhatsApp's privacy policy regarding their GDPR commitment.

Detailed explanations on the data collected are available at this link,
https://www.whatsapp.com/legal/privacy-policy-eea?lang=en_gb#privacy-policy-information-we-collect

There are some limitations regarding the nature of data that can be collected using the WhatsApp channel, more details are given on this link:<https://business.whatsapp.com/policy>

2.6.5. Google Chat (Communication Channel)

Google Chat (Communication Channel)

Communication services via Google Chat are provided by Google.

Messages and metadata from conversations on Google Chat may be processed by Google in accordance with their security and privacy practices. This helps ensure reliable and secure exchanges between users and TteamantSoft.

Detailed information on the data collected and its processing is available on these links:

Google Privacy Terms : <https://policies.google.com/privacy>

Google Chat Privacy Policy : https://workspace.google.com/intl/en/terms/user_features/

2.6.6. Microsoft Teams (Communication Channel)

TeemantSoft uses Microsoft Teams as an additional communication channel to facilitate exchanges between users and our services.

Data processed by Microsoft Teams: Messages, shared files, and metadata from conversations conducted via Microsoft Teams may be processed by Microsoft in accordance with their security and privacy practices. This processing helps ensure secure and optimized exchanges within the framework of interactions via the TeemantSoft platform.

Microsoft Teams may also collect technical data relating to the devices used (IP address, browser type, etc.) to ensure the quality and security of exchanges.

For more information, see the **Microsoft Privacy Policy** :

<https://www.microsoft.com/en-gb/privacy/privacystatement>

and the **Microsoft Teams Specific Terms** :

<https://learn.microsoft.com/en-gb/microsoftteams/Teams-overview>

2.6.7. Mistral OCR (Optical Character Recognition)

TeemantSoft uses Mistral OCR to automatically extract information from structured visual documents.

Data processed by Mistral OCR: Images or PDFs of documents (statements, forms, supporting documents) transmitted via the platform may be analyzed for the purposes of automated data extraction. These documents may contain Personal Data.

For more information, see Mistral AI's privacy policy,

<https://mistral.ai/static/doc/fr-politique-de-confidentialite.pdf>

2.6.8. Microsoft OCR (Optical Character Recognition)

TeemantSoft uses document recognition services offered by Microsoft, **Azure Document Intelligence** for advanced extractions from structured forms.

Data processed by Microsoft: Documents provided via TeemantSoft can be analyzed by Azure Document Intelligence (formerly Form Recognizer) to extract the information needed to automate administrative or reporting tasks.

For more information, see Microsoft's privacy policy,
<https://www.microsoft.com/en-gb/privacy/privacystatement>

2.6.9. ScaleWay (Data Hosting)

TteamSoft hosts its infrastructure at ScaleWay for secure storage of platform data.

Data processed by ScaleWay: ScaleWay manages the secure hosting of personal data, interaction files, and user settings. For more information, see ScaleWay's privacy policy.

Detailed explanations of the data collected are given in English at this link,
<https://www.scaleway.com/en/privacy-policy/>

2.6.10. Responsibility for Data Collected by Customers

In some cases, the data collected through the TteamSoft platform (e.g., name, surname, date of birth, or any other personal information requested by Gemma) is managed by our customers. This means that:

- **Data Retention:** Our customers are responsible for defining the retention period of the collected data.
- **Legal Basis for Processing:** It is up to our customers to ensure that they have an adequate legal basis to collect and process this data in accordance with the GDPR.
- **Anonymization and Deletion:** Our customers must also decide if and when to anonymize or delete this data.

3. Use of Data

TteamantSoft uses the personal data collected for several purposes, in compliance with the principles of security and confidentiality of information. Here are the main uses:

3.1. Provision of Services

The data is used to provide the features of our platform, including:

- **Account Access and Management:** Account information, such as first name, last name, email, and phone number, is essential for administrators, builders, and bot managers to log in and use the platform's features.
- **Interactions with Gemma:** Conversations between users and the virtual assistant Gemma are processed to provide answers and to improve the quality of interactions.

3.2. Improvement of Services and Technical Support

TteamantSoft also uses data to optimize its services:

- **Conversation analysis:** We anonymously analyze conversation threads to improve the accuracy and relevance of the responses provided by Gemma.
- **Technical support:** The information collected allows our support teams to provide assistance to users and quickly resolve any technical issues.

3.3. Security and Data Protection

We use certain personal information to ensure the security and protection of your data:

- **Fraud prevention:** Login information and device identifiers are used to monitor and prevent unauthorized access, as well as to detect possible suspicious behavior.
- **Encryption and anonymization:** We use anonymization and pseudonymization techniques to protect data, especially in cases where sensitive information may be processed in conversations with Gemma.

3.4. Legal and Regulatory Compliance

We also process data to meet legal obligations:

- **Legal requirements:** TteamantSoft may be required to retain certain information or disclose it to competent authorities if required by law.

- **Contractual compliance:** In cases where we process data on behalf of our clients, the processing is carried out in accordance with the terms agreed in our agreements with them.

3.5. Use of Data by Third Party Services

To improve certain features and provide an optimal experience, TteamantSoft shares specific data with third-party services:

- **OpenAI (for Gemma's AI):** Conversations can be shared with OpenAI for analysis and response generation.
- **Infobip and Meta WhatsApp (for messaging):** Contact data (phone numbers, message content) are processed by Infobip and Meta for communication on WhatsApp.
- **ScaleWay (hosting):** All data hosted on our infrastructure is securely stored at ScaleWay.

4. Data sharing

To provide our services and optimize the functionality of the TteamantSoft platform, we share certain personal data with external partners. We carefully select these partners and ensure that they comply with privacy standards and GDPR requirements.

4.1. Partners for Artificial Intelligence

- **OpenAI:** We share conversation information with OpenAI, our artificial intelligence provider, to enable Gemma, our virtual assistant, to generate accurate and personalized responses. The data processed includes user input in text form, which is transmitted to OpenAI for processing.

For more information, see OpenAI's privacy policy:

<https://openai.com/policies/privacy-policy/>

- **Mistral AI:** In certain conversation scenarios or for specific natural language processing features, TteamantSoft also shares conversation information with Mistral AI. The data processed by Mistral AI includes user text inputs, transmitted as part of the execution of artificial intelligence services. This data is processed in accordance with Mistral AI's confidentiality and security commitments.

For more information, see Mistral AI's privacy policy:

<https://mistral.ai/static/doc/fr-politique-de-confidentialite.pdf>

4.2. Multichannel Communication Partners

- **Infobip:** For multi-channel communication, including WhatsApp communications, we use the services of Infobip. Infobip processes user contact data, such as phone numbers and messages sent, to facilitate seamless communication between users and TeemantSoft.

More detailed explanations on Infobip's data sharing with its partners are given on this link, <https://www.infobip.com/policies/processors>

Further information regarding data sharing management is available at this link: <https://www.infobip.com/policies/data-transfer-agreement>

- **Meta WhatsApp Business:** User messages and metadata sent via WhatsApp are processed by Meta. This processing allows for real-time exchanges between users and our services. The management of this data complies with Meta's security and confidentiality standards, detailed in their Privacy Policy.

Detailed explanations regarding data sharing are available at this link, https://www.whatsapp.com/legal/privacy-policy-eea?lang=en_GB#privacy-policy-information-you-and-we-share

- **Google Chat:** We use Google Chat as an additional entry point for communication between users and our services. Messages and metadata from communications via Google Chat are processed by Google. This processing ensures smooth and secure communication between users and TeemantSoft, in accordance with Google's privacy and data management policies.

Detailed information about Google's data management and sharing is available at these links:

<https://policies.google.com/privacy>

Google Chat Privacy Policy https://workspace.google.com/intl/fr/terms/user_features.html

- **Microsoft Teams:** We use Microsoft Teams as an additional communication channel for users to interact with our services. Messages, shared files, and metadata from conversations via Microsoft Teams are processed by Microsoft to ensure smooth and secure interactions. Microsoft may also collect technical information (IP address, browser type, etc.) to optimize the quality of the service.

For more information, see:

Microsoft Privacy Policy : <https://www.microsoft.com/en-gb/privacy/privacystatement>

Microsoft Teams Specific Terms :

<https://learn.microsoft.com/en-gb/microsoftteams/Teams-overview>

4.3. OCR Partners

- **Mistral OCR:** For text extraction functions from structured visual documents (reports, forms, supporting documents), we share the relevant documents with Mistral OCR. This data is processed solely as part of the OCR service and is not retained after processing. Mistral OCR applies security standards that comply with GDPR requirements.

For more information, see the **Mistral AI Privacy Policy** :

<https://mistral.ai/static/doc/fr-politique-de-confidentialite.pdf>

- **Microsoft OCR (Azure Document Intelligence):** In some cases requiring advanced extractions, TeemantSoft uses Azure Document Intelligence (Microsoft OCR) to analyze structured documents. The documents provided are processed exclusively for the purpose of extraction, in accordance with Microsoft's privacy policies.

For more information, see the **Microsoft Privacy Policy** :

<https://www.microsoft.com/en-gb/privacy/privacystatement>

4.4. Hosting Partner

- **ScaleWay:** TeemantSoft's infrastructure is hosted on ScaleWay's secure servers, ensuring the safekeeping and management of personal data, user interactions, and settings. ScaleWay ensures continuous protection of stored information, in compliance with the GDPR.

Detailed explanations regarding data sharing are available at this link,
<https://www.scaleway.com/en/privacy-policy/>

4.5. Contractual Framework and Security of Shared Data

TteamSoft requires its partners to implement GDPR-compliant data protection practices. Each of the partners we work with is bound, through contractual agreements, to ensure the confidentiality, integrity, and security of the data we share. Information is shared only to the extent necessary to provide or improve the quality of services.

4.6. User Rights

In the event of sharing personal data with third-party partners, TeemantSoft users retain their rights of access, rectification, deletion and limitation of processing, as stipulated in the GDPR.

To exercise these rights, you can contact us at any time by the means indicated in this privacy policy.

5. Data retention

TteamSoft is committed to retaining personal data only for the period necessary for the purposes for which it was collected, in accordance with the requirements of the GDPR. The retention period varies depending on the nature of the data and the associated legal obligations.

5.1. Data Retention Period

- **Account Information (Administrators, Bot Builders, Bot Managers, Bot Users):** Account information, such as first and last names, email addresses, and phone numbers, is retained for as long as the account is active. Once the account is closed, this data will be deleted or anonymized **within 12 months**, except where there is a legal requirement to keep them for longer.
- **Conversations with Virtual Assistant Gemma:** Conversation threads are kept for a maximum duration of **6 months** to enable service improvement, problem solving and technical support. After this period, conversations are deleted or anonymized for further analysis, unless otherwise requested by the customer.
- **Communication Information:** Data collected during communications with our customer support (name, contact details, content of messages) are kept for a period of **2 years** for the purposes of support and improvement of services, then deleted or anonymized.
- **Technical Information (Connection Data and Device Information):** This data is kept for a maximum period of 12 months **after** their collection, for security and fraud prevention purposes.

5.2. Retention of Sensitive Data

In some cases, conversations with Gemma may include sensitive information or personal data of third parties (e.g., medical information). This data is handled with particular care and is either:

- **Pseudonymized or anonymized as soon as possible** if they are no longer required for the service.
- **Removed immediately after processing** if they are not required for ongoing support or service improvement.

5.3. Archiving and Deletion

- **Automatic Deletion or Anonymization:** At the end of the retention periods mentioned above, the data is automatically deleted or anonymized in our systems.

- **Legal and Contractual Retention:** In some cases, legal obligations may require us to retain certain personal data for longer periods. When required, we securely archive this data and strictly limit access to authorized persons.

5.4. User Rights

TteamSoft users have the right to request the deletion of their personal data before the end of the prescribed retention periods, subject to any legal retention obligations. To exercise this right, you can contact us using the contact details provided in this privacy policy.

5.5. Data Retention by our Partners

As part of our collaboration with third-party providers for certain aspects of our services, some partners may also retain personal data for the specific purposes for which we entrusted the data to them. We select our partners based on their commitments to security and GDPR compliance, and we ensure that they adhere to retention periods that comply with legal requirements.

- **OpenAI (Virtual Assistant Gemma):** Interactions with the virtual assistant may be temporarily stored by OpenAI to generate responses and improve the accuracy of language models. OpenAI applies its own retention rules, specified in its Privacy Policy for data processed through its APIs. TteamSoft ensures that sensitive or personal data is not retained longer than necessary.
- **Mistral AI (Gemma Virtual Assistant):** User interactions transmitted to Mistral AI for the purpose of generating responses via our virtual assistant Gemma may be temporarily stored by Mistral AI. The retention of this data is limited to a maximum period of 30 days, which is necessary to prevent abuse and improve model performance. After this period, the data is deleted from Mistral AI's systems, in accordance with their confidentiality commitments. No sensitive or personal data is retained longer than necessary.
- **Infobip et Meta WhatsApp (Multichannel Messaging):** Messaging data (phone numbers, message content) sent via Infobip and Meta WhatsApp are retained by these partners for limited periods, in compliance with GDPR practices and requirements. For more details, please see the Infobip and WhatsApp Business privacy policies.
- **Google Chat:** We use Google Chat as an entry point for interactions. Messages and metadata from communications via Google Chat may be processed by Google. This

processing is carried out in accordance with the Google and Google Chat privacy policies.

For more information, please see the Google Privacy Terms <https://policies.google.com/privacy> and the Google Chat Privacy Policy https://workspace.google.com/intl/fr/terms/user_features.html.

- **Microsoft Teams:** We use Microsoft Teams as an additional communication channel for user interactions. Messages, files shared, and metadata from conversations via Microsoft Teams may be processed by Microsoft. This processing is carried out in accordance with Microsoft's privacy policies and the specific terms of Microsoft Teams. Data is retained by Microsoft for the duration necessary to provide the service, in compliance with legal requirements and confidentiality commitments.

For more information, please visit:.

Microsoft Privacy Policy

<https://www.microsoft.com/en-gb/privacy/privacystatement>

Microsoft Teams Specific Terms

<https://www.microsoft.com/en-gb/privacy/privacystatement>

- **Mistral OCR (Optical Character Recognition):** Documents transmitted to Mistral OCR as part of the text extraction functionalities (reports, forms, supporting documents) are processed in real time and **are not retained after processing**. Mistral OCR undertakes not to keep any copies of the processed files in its systems.
- **Microsoft OCR (Azure Document Intelligence):** TteamSoft uses Azure Document Intelligence (Microsoft OCR) services for certain data extractions from structured documents. Microsoft does not retain documents transmitted via API, in accordance with Microsoft Azure's contractual commitments and privacy terms. Extracted data may be retained temporarily for the purpose of processing, but no long-term storage of the original documents is carried out by Microsoft.

- **ScaleWay (Data Hosting):** Our data is hosted by ScaleWay, which applies strict data retention and archiving measures in accordance with the GDPR. The duration of data retention in ScaleWay's infrastructure is limited to TeemantSoft's operational needs and contractual obligations.

Detailed explanations regarding data retention are available at this link, <https://www.scaleway.com/en/privacy-policy/>

5.6. Monitoring and Compliance with Retention Periods

TeemantSoft ensures, through contractual agreements, that each partner implements GDPR-compliant data retention and only uses shared information for the purposes necessary for the service. We conduct regular audits to ensure that each partner adheres to data retention commitments.

5.7. Data Collected on Behalf of Customers

When personal data is collected by the TeemantSoft platform on behalf of a client, the client is responsible for defining retention periods and ensuring their legal compliance. TeemantSoft provides technical tools to facilitate the management of retention and anonymization, but the ultimate responsibility lies with the client.

6. User Rights

In accordance with the GDPR, TteamSoft users have rights regarding their personal data. TteamSoft is committed to facilitating the exercise of these rights and processing each request diligently.

6.1. Right of Access

Users may request access to the personal data TteamSoft holds about them. This right allows them to receive information about the data collected, the purposes of processing, the categories of recipients, and the retention periods.

6.2. Right of Rectification

Users have the right to request the rectification of their inaccurate or incomplete personal data. TteamSoft updates this information to ensure its accuracy and relevance.

6.3. Right to Deletion

Also known as the “right to be forgotten,” this right allows users to request the deletion of their personal data in certain cases, for example, when the data is no longer necessary for the purposes for which it was collected or processed, or when consent is withdrawn.

6.4. Right to Restriction of Processing

Users may request that the processing of their personal data be restricted in certain cases, for example, when they contest the accuracy of the data or object to the processing.

6.5. Right to Data Portability

Users have the right to receive their personal data in a structured, commonly used and machine-readable format, in order to transmit them to another controller, where technically feasible.

6.6. Right of Objection

Users may object, for legitimate reasons, to the processing of their personal data, particularly in the context of direct marketing activities.

6.7. Withdrawal of Consent

When processing personal data is based on consent, users have the right to withdraw their consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to its withdrawal.

6.8. Right to File a Claim

Users have the right to lodge a complaint with a competent data protection supervisory authority if they consider that their rights have not been respected.

6.9. Exercise of Rights

To exercise these rights, users may contact TteamantSoft using the contact details provided in this Privacy Policy. TteamantSoft will respond to requests within the timeframes required by the GDPR and will inform users of any action taken as a result of their request.

End users who have interacted with services managed by a customer through TteamantSoft should contact that customer directly for any request relating to access, rectification or deletion of their personal data collected through this means.

7. Privacy Policy Updates

TteamantSoft may update this Privacy Policy to reflect changes in its practices, as part of the evolution of its services, legal requirements, or industry standards.

7.1. Frequency of Updates

We regularly review our Privacy Policy and will update it at least once a year or as necessary in the event of a significant change in our processing of personal data.

7.2. Notification of Changes

In the event of a material change to this Policy, TteamantSoft will notify users in a visible manner on the platform or through email notifications (if contact information is available), at least 30 days before the changes take effect. This notification will allow users to become aware of the changes and, where applicable, exercise their rights.

7.3. Acceptance of Changes

Continued use of our Services after changes to this Privacy Policy become effective will constitute acceptance of those changes. We encourage users to periodically review this Privacy Policy to stay informed of our privacy practices.

8. Contact

For any questions, requests or concerns regarding this Privacy Policy or your personal data, you may contact TteamantSoft by the following means:

- **E-mail address** : contact@teemantsoft.com
- **Mailing address** (if necessary) : TteamantSoft OÜ, Sepapaja tn 6, Lasnamäe district, 15551 Tallinn, Estonia

We encourage you to contact us with any requests for information or assistance regarding your personal data rights. We are committed to processing each request as quickly as possible, in accordance with GDPR requirements.

9. Legal Basis for Processing

TteamSoft processes your personal data based on legal bases that comply with the GDPR. Here is an overview of the purposes, types of data involved, legal bases, and retention periods for each type of data processing:

Purposes of Processing	Data Involved	Legal Bases	Retention Period
Account Management and Access to Services	Name, first name, email, telephone number	Performance of a contract	For the duration of the contract, then 12 months after closing the account
Interactions with Gemma (Virtual Assistant)	Content of conversations	Legitimate interest	Up to 6 months, then anonymization
Improvement of Services and Technical Support	Content of conversations, technical information	Legitimate interest	Up to 12 months for analysis and optimization
Fraud Prevention and Data Security	Login data, device identifiers	Legitimate interest	Up to 12 months
Compliance with Legal Obligations and Compliance	User account data, customer communications	Legal obligation	According to legal requirements (e.g. up to 5 years for certain bonds)
Multichannel Messaging (via Infobip et WhatsApp)	Phone number, message content	Consent or performance of a contract	According to Infobip and WhatsApp retention policy
Multichannel Messaging (Google Chat)	Message content, metadata	Consent or performance of a contract	According to Google's retention policy

Multichannel Messaging (Microsoft Teams)	Content of messages, files, metadata	Consent or performance of a contract	According to Microsoft's retention policy
Data Extraction (Mistral OCR)	Visual documents (PDF, images), extracted data	Legitimate interest or contract	No retention of documents after processing
Data Extraction (Microsoft OCR)	Visual documents (PDF, images), extracted data	Legitimate interest or contract	Temporary storage for processing only
Data Hosting (via ScaleWay)	Account Data and Platform Content	Performance of a contract	According to ScaleWay's retention policy

Additional Explanations

- **Performance of a contract** These treatments are necessary to provide the requested services and ensure the management of customer accounts.
- **Legitimate interest:** Used for service improvements and to ensure security, in balance with user rights.
- **Legal obligation:** Some processing is mandatory to meet legal requirements, for example, to retain data for tax purposes or for security investigations.

10. Transfer of Data Outside the European Union

TeemantSoft is committed to protecting its users' personal data, including when it is transferred outside the European Economic Area (EEA). Some of our partners, such as OpenAI, Infobip, and Meta, may process data outside the EEA to deliver their services. We ensure that any data transfer to third countries complies with GDPR security and privacy standards.

10.1. Transfer Protection Mechanisms

For any transfer of data outside the EEA, we apply the following guarantees:

- **Standard Contractual Clauses:** TeemantSoft uses Standard Contractual Clauses (SCCs) approved by the European Commission in contracts with its partners to ensure an adequate level of protection of the transferred data.
- **Certifications and Adherence to Data Protection Frameworks:** Our partners, when based in the United States, may be subject to protective frameworks such as the EU-U.S. Data Privacy Framework (formerly Privacy Shield), ensuring compliance with EU data protection requirements.
- **Additional Security Measures:** We ensure that our partners apply additional security measures, such as encryption and pseudonymization of data.

10.2. Rights of Users Affected by Transfers

TeemantSoft users have the right to receive information regarding transfers of their data outside the EEA. For any questions regarding data transfers, or to obtain a copy of the safeguards in place, you can contact us at contact@teemantsoft.com.