

# Privacy Policy

**Ambio Oy and Ambio GmbH** · Last updated: 8 October 2026 · Version: 1.1

Ambio ("we", "us") operates a platform for trading recycled plastics. Ambio is two companies:

- **Ambio Oy**, Urho Kekkosen katu 4-6 F, 00100 Helsinki, Finland · Business ID 3338492-8 (VAT FI33384928) — the parent company, which operates the platform and all shared systems.
- **Ambio GmbH**, Boxhagener Str. 18 (St. Oberholz c/o Ambio), 10245 Berlin, Germany · Amtsgericht Charlottenburg HRB 267340 B — our German trading company.

Whichever company you contract with is the **controller** of your data for that relationship. Ambio Oy runs the platform and shared systems for Ambio GmbH under an intra-group agreement, and the two companies are joint controllers for the shared supplier and customer base — Ambio Oy handles supplier qualification, the systems and these notices; each company answers for the contracts it signs. You can exercise your rights against either company through the single contact below.

**Contact for both companies:** [privacy@ambiomaterials.com](mailto:privacy@ambiomaterials.com)

Neither company has appointed a data protection officer as the GDPR does not require one for our processing, and Ambio GmbH is below the threshold in German law (BDSG §38). The privacy contact above handles all data protection matters for both.

---

## 1. Who this policy is for

Almost all personal data we process is business-contact data about people acting for companies, not data about people in their private lives.

This policy is the general statement of how we handle personal data, and it is the privacy notice for **visitors to [ambiomaterials.com](https://ambiomaterials.com)** (section 3). If you belong to one of the groups below, a separate notice gives you the full detail for your situation:

| If you are                                                                              | See                                           |
|-----------------------------------------------------------------------------------------|-----------------------------------------------|
| An employee or contractor of Ambio Oy                                                   | Employee Privacy Notice                       |
| An employee of Ambio GmbH                                                               | Datenschutzhinweise für Beschäftigte (German) |
| A job applicant or someone we approached about a role                                   | Job Applicant Privacy Notice                  |
| A contact at a supplier or customer company                                             | Counterparty Representative Privacy Notice    |
| A user of <a href="https://platform.ambiomaterials.com">platform.ambiomaterials.com</a> | Platform User Privacy Notice                  |
| A prospect or marketing contact                                                         | Marketing Contact Privacy Notice              |

Each notice is available at [ambiomaterials.com/privacy](https://ambiomaterials.com/privacy) or on request from [privacy@ambiomaterials.com](mailto:privacy@ambiomaterials.com).

## 2. What we process, and why

In summary, we process:

- **Employees and contractors** — identification, contract, payroll, tax and pension data, work-account data, and occupational-health data where Finnish law requires it, to run employment and meet our statutory obligations.
- **Job applicants** — CVs, applications, contact details, interview notes and assessments, to recruit.
- **Counterparty representatives** — name, role, business contact details and correspondence, to negotiate and perform contracts, manage accounts, and execute transactions. We also obtain business credit reports on the companies we trade with, which may name directors, owners or signatories.
- **Platform users** — a minimal account profile, an essential session cookie, and logs of actions on business records, to provide and secure the platform.
- **Marketing contacts** — business contact details and engagement data, for outreach and event invitations.
- **Website visitors** — see section 3.

The lawful basis for each purpose is set out in the notice for that group.

Where we rely on legitimate interest as the lawful basis for a purpose, Article 6(1)(f) GDPR requires us to first weigh our interest in that processing against your rights and freedoms. We have carried out and documented that balancing test for every purpose relying on legitimate interest and we can explain its outcome on request.

### 3. Visitors to [ambiomaterials.com](https://www.ambiomaterials.com)

Our marketing website is hosted on **Webflow**. When you visit:

- **Always:** we process technical data needed for the site to work and stay secure — IP address, browser and device information, and essential cookies. Lawful basis: our legitimate interest in operating and securing the site.
- **Only with your consent**, given through the cookie banner: analytics, functionality and marketing cookies, used to measure site use, remember your preferences, and support targeted outreach. You can change or withdraw your choice at any time through the banner or your browser settings. Lawful basis: consent.
- **If you submit a form:** quote requests and contact forms are sent to our own backend at [platform.ambiomaterials.com](https://platform.ambiomaterials.com) so we can respond. We keep what you send us and use it to follow up. Lawful basis: our legitimate interest in responding to an enquiry, and steps towards a contract where you ask for a quote.

Analytics are provided by **Google Analytics**. Analytics data is retained for 14 months; technical and security logs for 12 months. Form submissions become part of the relationship record if a relationship follows, and are otherwise deleted after 12 months.

#### Cookies used on our website [[www.ambiomaterials.com](https://www.ambiomaterials.com)]

| Cookie name | Cookie type | Category           | Purpose                                                          | Duration | Party                     |
|-------------|-------------|--------------------|------------------------------------------------------------------|----------|---------------------------|
| _cfuvid     | Session     | Strictly necessary | Set by Cloudflare to distinguish visitors sharing an IP address, | Session  | First (set by Cloudflare) |

|                   |            |                    |                                                                       |           |                |
|-------------------|------------|--------------------|-----------------------------------------------------------------------|-----------|----------------|
|                   |            |                    | so bot protection doesn't block legitimate users                      |           |                |
| cookieyes-consent | Persistent | Strictly necessary | Stores the visitor's cookie consent choices (CookieYes)               | 1 year    | First          |
| _ga               | Persistent | Analytics          | Google Analytics: distinguishes users                                 | 2 years   | First          |
| _ga_YGLKJE9MW0    | Persistent | Analytics          | Google Analytics: stores session state                                | 2 years   | First          |
| _gcl_au           | Persistent | Marketing          | Google Ads: links ad clicks to conversions on the site                | 3 months  | First          |
| __Secure-ENID     | Persistent | Marketing          | Google: stores preferences and supports ad personalisation            | 13 months | Third (Google) |
| SEARCH_SAMESITE   | Persistent | Marketing          | Google: controls how Google's cookies are sent in cross-site requests | 6 months  | Third (Google) |

#### 4. AI-assisted processing

We use AI to extract information from business documents (for example technical data sheets) and to help draft communications. Document content and contact details may therefore be processed by our AI providers, **Anthropic** and **Google (Vertex AI)**, under contracts that prohibit using our data to train their models and that limit how long they keep it. Vertex AI processing takes place in the EU. Anthropic processes in the United States under the safeguards in section 6 and retains inputs for no more than 30 days.

A person reviews every AI-drafted communication before it is sent. **We do not make any decision about you by automated means alone** that would have a legal or similarly significant effect on you.

## 5. Who we share personal data with

**Service providers acting on our instructions** (processors), each under a data processing agreement, such as: Google Cloud (hosting), Auth0 (login), Pipedrive (CRM), Front (email), Procountor (Ambio Oy accounting and payroll), Sentry (error monitoring), SendGrid (transactional email), Slack, Notion, Airtable, Google Workspace, Google Analytics, Webflow, JOIN, Juicebox and LinkedIn Sales Navigator (recruitment, for the data our recruiters enter), Anthropic and Google Vertex AI (AI processing).

**Recipients who act for their own purposes** (independent controllers): such as our banks —; tax adviser running payroll and tax filings; freight carriers, who receive delivery contact details in order to carry goods; business credit reports providers; recruiting service providers; and our statutory occupational health provider, for employee health services; and public authorities where the law requires it, such as the Tax Administration and pension institutions.

We do not sell personal data.

## 6. International transfers

We process personal data primarily in the EU. Some of our service providers process personal data in the United States: Anthropic, Slack, Notion, Airtable, SendGrid, Webflow, Google Analytics, and the recruitment tools JOIN and Juicebox. Those transfers are protected by the **EU-US Data Privacy Framework** where the provider is certified and otherwise by the **EU Standard Contractual Clauses** (Juicebox relies on the Clauses alone). Ask us and we will tell you which safeguard applies to a given provider and give you a copy of the relevant terms.

## 7. How long we keep personal data

Only as long as the purpose requires, or as long as the law obliges us to. Each notice gives the detail for its group; the summary is:

| Data                                                     | Kept for                                                                                                                                                                                                                             |
|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Accounting, invoicing and transaction records — Ambio Oy | 10 years for financial statements, books of account and the chart of accounts, and 6 years for accounting vouchers and other accounting material, after the end of the financial year (Finnish Accounting Act Chapter 2, Section 10) |
| Books, accounts and vouchers — Ambio GmbH                | 10 years for books and annual accounts, 8 years for accounting vouchers, 6 years for commercial correspondence, from the end of the calendar year (HGB §257, AO §147)                                                                |
| Counterparty contact records not part of the accounts    | Until the business relationship ends                                                                                                                                                                                                 |
| Business credit reports                                  | Until superseded by a newer report, and at most 12 months after the trading relationship ends                                                                                                                                        |
| Employment records                                       | Statutory periods — Finland: payroll accounts 10 years, supporting vouchers and records 6                                                                                                                                            |

| Data                                       | Kept for                                                                                                                                                                                                  |
|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                            | years, both from the end of the financial year; Germany: payroll accounts 6 years, social-insurance records 5 years, other records 3 years after leaving; non-statutory data deleted at end of employment |
| Unsuccessful job applications              | 24 months after the decision (Ambio Oy); 6 months (Ambio GmbH)                                                                                                                                            |
| Talent pool                                | Until consent is withdrawn, at most 24 months before we ask again                                                                                                                                         |
| Marketing contacts                         | Until you object, or 24 months without engagement; suppression list indefinitely                                                                                                                          |
| Platform account data                      | For the life of the account, then deleted or anonymised                                                                                                                                                   |
| Platform, security and authentication logs | 12 months                                                                                                                                                                                                 |
| Error-monitoring session replays           | 90 days                                                                                                                                                                                                   |
| Website analytics                          | 14 months                                                                                                                                                                                                 |
| Website form submissions                   | Become part of the relationship record, or deleted after 12 months if no relationship follows                                                                                                             |
| AI provider copies of prompts              | Anthropic at most 30 days; Google Vertex AI none                                                                                                                                                          |

## 8. How we protect personal data

We restrict access by role, encrypt data in transit and at rest, host in the EU, keep audit logs, mask sensitive content in error monitoring, and require data processing agreements from our providers.

## 9. Your rights

You have the right to:

- **access** the personal data we hold about you, and receive a copy;
- **correct** data that is inaccurate or incomplete;
- **erase** data, where there is no lawful reason for us to keep it;
- **restrict** how we use it while a question about it is resolved;
- **object** to processing based on legitimate interest — and we will **always** stop using your data for direct marketing if you object;
- **receive your data in a portable format**, where we process it by automated means on the basis of consent or a contract;
- **withdraw consent** at any time, where we rely on it. Withdrawal does not affect processing that already took place.

Write to [privacy@ambiomaterials.com](mailto:privacy@ambiomaterials.com). We answer without undue delay and in any event within one month. If a request is complex we may extend that by up to two further months, and we will tell you within the first month if we do. There is no charge.

## 10. Complaints

If you think we have handled your personal data incorrectly, please tell us first — we would like the chance to put it right. You can also complain to a supervisory authority: for Ambio Oy the **Office of the Data Protection Ombudsman** (Tietosuojavaltuutetun toimisto) · tietosuoja.fi · Lintulahdenkuja 4, 00530 Helsinki; for Ambio GmbH the **Berliner Beauftragte für Datenschutz und Informationsfreiheit** (datenschutz-berlin.de), Alt-Moabit 59-61, 10555 Berlin; or the authority where you live or work.

## 11. Changes to this policy

We update this policy when our processing changes. The date at the top shows the current version.