

Privacy Policy

Last Updated: Jun 13, 2023

At FledgerrAI B.V. ("we", "us", "our"), your privacy is our top priority. We provide legal chatbot services to legal entities ("Service"). This Privacy Policy describes how we collect, use, and share your personal information in compliance with the General Data Protection Regulation (GDPR) and Dutch data privacy laws.

1. Data We Collect and Process

To provide our Service, we collect and process the following types of data:

- Identity Data: Your name.
- Contact details: Includes your valid email address.
- Profile Data: Your username, and password.
- Organisation information: The company on whose behalf you enter into a relationship with us.
- Invoice details: We collect this information for transactions related to our Service.
- Technical Data: Your IP address, internet service provider (ISP), browser type and version, access time, visited pages, operating system, language and time zone settings, browser plug-in types, geolocation information, cookie identifiers, advertising identifiers, mobile device-type identifiers, and other technology on the devices you use to access FledgerrAI.
- User Information: Information about how you access our website and interact with our website, us, as well as any feedback provided to us, occurrences of technical errors, diagnostic reports, setting preferences, searches, views, clickstreams, page navigation, page interaction information, and your conversations and chats with us.
- Cookie Usage: We use cookies to recognize and remember your login information and preferences.

We never collect or process sensitive data or data pertaining to children. FledgerrAI is a business-to-business service directed to and intended for use by individuals who are 18 years of age or older. We do not target children and do not knowingly collect personal data from anyone under 16 years of age.

2. Purpose and Basis for Data Collection and Processing

We collect and process your personal data for the following purposes:

- To provide, maintain and improve our Service: We process this data on the basis of contract performance.
- To communicate with you about our Service, respond to your inquiries, and for other customer service purposes: We process this data based on our legitimate interest in providing effective customer service.

- To send you newsletters and invitations to our events: We process this data based on your consent.

3. Collection and Processing of Data

Data collection and processing occur when you:

- Register for our Service: We collect your identity, contact, profile, organisation and invoice details.
- Use our Service: We collect data related to your use of our Service.
- Subscribe to our newsletter or accept our event invitations: We collect your email address for communication.

4. Retention of Personal Data

We retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. The exact period will depend on your interactions with our Service.

Criteria for Determining Retention Duration

The criteria used to determine the storage duration include:

- a. Purpose of Data Processing: We store personal data as long as it is necessary to fulfill the specific purpose for which it was collected, such as providing services, communicating with you, or complying with legal obligations.
- b. Legal Obligations: We may be required to retain personal data for extended periods of time to comply with applicable laws, such as tax and financial regulations or any other legal requirements.
- c. Contractual Relationships: We store personal data for the duration of our contractual relationships with users and as required to comply with any contractual obligations or to resolve disputes that may arise.
- d. Consent: In cases where we process personal data based on your consent, we store the data until you withdraw your consent, unless there is another legal basis for continuing the processing.
- e. Legitimate Interests: We may store personal data for as long as necessary to protect our legitimate business interests, such as fraud prevention, maintaining the security of our systems, or improving our services.

5. Data Deletion and Anonymisation

You have the right to request the deletion of your personal data. Upon your request, we will delete your personal data, unless legal obligations require us to retain it. Once the personal data is no longer necessary for its intended purpose, we will securely delete or anonymize the data in

accordance with applicable laws and regulations. In some cases, we may retain anonymized or aggregated data for statistical or research purposes, provided that this data can no longer be used to identify you.

6. Information on Website Use and Cookies

What are cookies?

Cookies are small text files stored on your device by websites you visit. They enhance user experience, enable website functionality, and inform website owners. Cookies can store various data, including user preferences, login details, and browsing behaviour. The use of these cookies is subject to your consent.

Types of cookies used by FledgerrAI

FledgerrAI uses the following cookies on our software platform:

- a. **Essential Cookies:** These cookies are critical for our platform's proper functioning, enabling core features like user authentication, security, and website navigation. You cannot disable these cookies.
- b. **Preference Cookies:** These cookies store your personal preferences, such as language or display settings, improving your user experience. Disabling these cookies may affect certain features or settings.
- c. **Analytics Cookies:** These cookies collect anonymised data about your platform usage, helping us understand your interactions with our services and allowing us to enhance the platform's performance.
- d. **Marketing Cookies:** With your consent, these cookies track your online activity to provide personalised advertising and marketing communications about our services.

Why we use cookies

FledgerrAI uses cookies for these purposes:

- a. To provide a seamless, personalised user experience by remembering your preferences, login information, and browsing history.
- b. To analyse and optimise platform performance and user experience using aggregated user behaviour data.
- c. To measure our marketing effectiveness and deliver targeted advertisements based on your online activity and interests.
- d. To ensure our platform's security and integrity by detecting and preventing fraudulent activity and unauthorised access.

Managing your cookie preferences

You can manage your cookie preferences anytime by adjusting your browser settings or using our platform's cookie consent management tool. Disabling certain types of cookies may impact your user experience and some platform features' availability.

For more information on managing cookies in your browser, please consult your browser's help documentation or visit www.allaboutcookies.org.

[Click here for an overview of our cookies.](#)

Third-Party Service Providers

We may link to third-party websites. This Privacy Policy does not apply to these websites, and we are not responsible for their content or privacy practices. Please review the privacy policies of these third-party websites before using them.

- Cloudflare
- GSuite
- DigitalOcean
- Hubspot
- SendGrid
- Stripe
- Discord

7. Newsletter

If you subscribe to our newsletter, we will use your email address to send you updates about our Service. You can unsubscribe at any time by following the instructions in our emails.

8. Invitations and Other Emails

We may use your email address to send you invitations to our events or other communications related to our Service.

9. Disclosure to Third Parties

We may share your personal data with third parties who provide services on our behalf, such as payment processing and email delivery. These third parties are prohibited from using your personal data for any other purposes.

10. Transfer to Third Parties

We do not transfer your personal data outside the European Union. All personal data is stored and processed within the EU.

11. Your Rights

Under GDPR and Dutch data privacy laws, you have the right to access, rectify, erase, restrict the processing of, or object to the processing of your personal data. You also have the right to data portability. You can exercise these rights by contacting us at the address provided below.

a. Right to Access

You can request access to your personal data we hold, including processing details, data categories, recipients, and storage duration. We will provide a free copy of your data unless the request is excessive or repetitive.

b. Right to Rectification

You can request the correction of any inaccurate or incomplete personal data we hold. We will ensure your data's accuracy and completeness.

c. Right to Erasure (Right to be Forgotten)

You can request your personal data's erasure under specific circumstances, such as when data is no longer necessary, you withdraw consent, or data has been unlawfully processed. We will delete data where applicable, subject to legal or legitimate requirements.

d. Right to Restriction of Processing

You can request restricted processing of your personal data under specific circumstances, like when data accuracy is contested, the processing is unlawful, or when data is no longer needed but required for legal reasons. We will store but not process data without your consent or a legal basis.

e. Right to Data Portability

You can request a copy of your personal data in a structured, commonly used, machine-readable format for easy transfer to another service provider.

f. Right to Object

You can object to your personal data's processing for direct marketing or when processing is based on our legitimate interests. We will stop processing unless there are compelling legitimate grounds overriding your rights and interests, or when processing is necessary for legal reasons.

g. Right to Withdraw Consent

You can withdraw your consent for processing your personal data at any time. This will not affect pre-withdrawal lawful processing.

h. Right to Lodge a Complaint

You can lodge a complaint with a supervisory authority if you believe our processing of your personal data violates GDPR or applicable privacy regulations.

12. Contact Us and Complaints

If you have any questions about this Privacy Policy or our privacy practices, or you want to file a request please contact our Data Protection Officer at:

Company Name: Fledgerr B.V.

Address: Wilhelmina van Pruisenweg 35, 2595AN, The Hague, the Netherlands

KVK: 81065213.

Email: dpo@fledgerr.com

You also have the right to lodge a complaint with a supervisory authority if you believe that we have not complied with the requirements of the GDPR or Dutch data privacy laws.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. If we make significant changes, we will notify you by email or through our Service. We encourage you to review this Privacy Policy periodically to stay informed about our privacy practices.

By using our Service, you acknowledge that you have read and understood this Privacy Policy.