

# PRIVACY NOTICE

for users of DPA AI, visitors to the site,  
and persons that are identified in submitted documents

*Last updated: 1 November 2019*

Hi there,

Thank you for using our artificial intelligence-powered tool to analyse data processing agreements (which we will abbreviate to “**DPA(s)**”), available on [www.dpa.ai](http://www.dpa.ai), as a word add-in, and as an email service (all of which will be referred to as the “**DPA AI**” or the “**Service**” to keep things simpler).

For the avoidance of doubt, “we” are Synch Advokat AB, a Swedish law firm with its office in Stockholm. You will find our full contact information at the end of this document.

This Privacy Notice may come to be updated in the future. If any currently held personal data would be used for new purposes, we will contact you and notify of these changes. In other cases, we will post a new version of this Privacy Notice here.

The DPA AI processes personal data in three ways:

- A) when the service is used by ways of emails;
- B) when cookies are set and read by the online interface for the service; and
- C) in case personal data is contained in a document that is uploaded to be reviewed with the DPA AI (we cannot rule out the possibility that unmasked contact details to a data protection officer or other point of contact are included in the document).

When using the DPA AI it is also possible to submit personal data to us if you chose to contact us by using the forms available on the DPA AI website.

We are personal data controllers for the submitted personal data – which means that we determine the purposes and means of the processing – and we will process it in accordance with this privacy notice. For information about the cookies on the site, we have provided a list in this Privacy Notice of the cookies used, and you can find the full information [here](#).

## **1. PROCESSING OPERATIONS**

### **1.1 When you use the Service via email**

At the moment we only use shared email addresses for the organisation using the Service – e.g. “[contact@synchlaw.se](mailto:contact@synchlaw.se)”, thus not constituting personal data.

However, in the future, individual users will be able to use the service. Their email address will be processed, and it will in many cases disclose the name and company of the user.

The email address will be used for

- 1) user authentication, by ways of matching the email’s domain with a list of approved domains; and
- 2) to deliver the results of the analysis back to the sender.

Synch uses Sendgrid to send and receive emails. Sendgrid is based in the U.S., and is certified under the EU – U.S. Privacy Shield.

Synch does not store any information connected to the email addresses used to access the Service.

### **1.2 When you contact us, we process the following personal data:**

- your name;
- your email-address;
- the company you work at or represent; and possibly
- depending on what you write to us in the free text field, we may be supplied personal data to the extent you include it in your message to us.

It is most likely that you have provided us with this information yourself, but it is also possible that a colleague of yours or someone else has given us your contact information. If that is the case, you will learn of this when we contact you regarding the DPA AI, which we aim to do as soon as possible after receiving the message.

If you do not provide us with your contact information, you will not be able to send us a message using this channel.

### **1.3 When you submit a DPA, it may contain the following personal data:**

- it is possible that the DPA contains the name and contact information to a company’s data protection officer, point of contact, and/or the name and title of the signatories;
- also, since you are free to upload whatever text you wish to the DPA AI, we understand that this text may include personal data submitted by you, regardless of whether this is relevant to check a DPA or not.

### **1.4 We use cookies on the DPA AI-website**

- some cookies contain user-identifiers or similar information, which we consider to be personal data and therefore treat as such.

## **2. PURPOSES AND LEGAL GROUNDS FOR THE PROCESSING**

The legal grounds and purposes for the processing are specified in the table below.



We process the personal data for the following <b>purposes</b>	The legal ground and our specific <b>legitimate interests</b> are
(i) To provide the Service via email, which entails authenticating the user's email address and using it to deliver the results.	This processing is based on the fulfilment of a contract between Synch and the user, namely the Terms and Conditions for the Service.
(ii) We need your contact information to get back to you when you contact us.	Our legitimate interest: we want to reply to you if you request further help from us, and reply to you if you have feedback on how we can improve the DPA AI.
(iii) Provide the service as requested by you, and therefore we may process personal data as a consequence of how you use the DPA AI – in other words, because the uploaded DPA may contain personal data.	Our legitimate interest: we want the DPA AI to be a simple and effective tool to use, which is the reason why we permit users to submit information as-is.
(iv) We use cookies to ensure the protection of information that is transferred when using the Service.	Our legitimate interest: we want to ensure the integrity of information transmitted and received.

The fact that we base our processing on our legitimate interests means that we have considered how we process the personal data concerning you, or persons referred to in the DPA, in relation to how this affects you or them. We have come to the conclusion that you are most likely ok with us processing personal data in order to reply to you, since you reached out to us.

As for natural persons who are identifiable from the content of a DPA, it is our belief that they understand that their position and role in connection with processing personal data will involve making some information about them known to counterparties to the DPA and to persons that are involved in the process of entering the DPA – i.e. advisers and service providers. Their expectation might not be that a Swedish law firm would process this information with an artificial intelligence-powered tool, but we consider our processing to be an insignificant intrusion of their privacy and no infringement of their rights and freedoms.

As for the cookies, we only use them to ensure the integrity of the service, and they are not tracking your online behaviour.

If you are curious about how we have reasoned regarding our legitimate interests, please reach out to us and we will explain this in detail. If you are not ok with this, just let us know and we will stop – there is more information on this further below.

### 3. SOURCES, TRANSFERS AND STORAGE

**The source of the personal data** that is contained in text submitted to us either comes from DPAs, which may or may not be public on the internet, or any other source which the user sees fit to use. The email address is provided directly by you.

**We transfer the personal data to**

- 1) Amazon Web Services, which provides hosting services for the DPA AI. The servers for this are located in Frankfurt, Germany;



- 2) SendGrid, which supplies email-services to us. SendGrid’s primary processing facilities are in the U.S. The SendGrid Services also use data centers in the United Kingdom, India, and Japan for geo-forwarding; and
- 3) the user which has requested analysis of the DPA.

**We store the personal data** in accordance with the table below.

<u>Data</u>	<u>Retention time</u>
Email addresses (for providing the Service)	The email addresses are not stored in any way by us. SendGrid stores the data as long as we use their service, and will retain the data in their backup systems for up to 1 year after the termination of our agreement with SendGrid.
Email addresses (for communication regarding the service)	This data is stored for as long as this is necessary to correspond with you. If we haven’t communicated with you for more than six months, we erase the personal data concerning you.
Cookie data	As for the cookies, the identifiers are stored in your device, and we only access the information when you use the service. You may delete the cookies yourself any time, using your web browser where the cookies have been placed.

#### 4. COOKIES

We use the following cookies on the DPA AI website. For more information about cookies, please see [here](#).

<u>Name</u>	<u>Domain</u>	<u>Purpose</u>	<u>Expires</u>
csrftoken	dpa.ai	“csrf” stands for “cross-site forgery request”. This cookie is used to ensure the safety when submitting a form (i.e. the DPA submitted for analysis).	After one year
AWSELB	dpa.ai	AWSELB cookie ensures user session integrity	For the duration of the browser session

#### 5. YOUR RIGHTS

**You have the following rights regarding your personal data**, which means that you have the right to:

- Access: meaning that you have the right to information about the processing, access to the personal data in question, and the right to obtain a copy of it.
- Rectification: meaning that we must correct the personal data if it is incorrect.
- Erasure: meaning that we must erase the personal data in certain circumstances, such as if there is no point in processing it any longer.
- Object to processing: you have the right to object to our processing of personal data. This is particularly relevant for you since we are basing some aspects of our



processing on the legal ground of our legitimate interests. If you disagree with how we have balanced our interests against yours, you may object to our processing.

- Restriction of the processing: this is like an alternative to erasure, but where we only store the personal data without doing anything with it.
- Data portability: if you want us to transfer the personal data to someone else, we will help you with this, even if this means transferring it to another law firm.

Also, you have the right to lodge a complaint with the relevant supervisory authority.

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Thank you for reading all of this, and please feel free to drop by for a coffee at any time!

We are Synch Advokat AB

Contact us here: [privacy@synchlaw.se](mailto:privacy@synchlaw.se)

Or here: Birger Jarlsgatan 6, 114 36 Stockholm

