

PRIVACY NOTICE

for users of Maigon DPA and persons that are identified in submitted documents

Last updated: 28 April 2020

Hi there,

This privacy notice (the “**Privacy Notice**”) applies to the personal data processing performed by Maigon AB, org. num. 559246-2591 (hereinafter “**Maigon**”, “**we**”, “**us**”, “**our**”) to Maigon DPA, our artificial intelligence-powered tool to analyse data processing agreements (“**Maigon DPA**”).

If you wish to contact us, you can find our full contact information at the end of this document.

This Privacy Notice may be updated in the future. If any currently held personal data would be used for new purposes, we will contact you with a notification of these changes and if necessary, ask for your consent to such changes. In other cases, we will post a new version of this Privacy Notice here on this website https://dpa.ai/privacy_policy/.

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

We are a personal data controller 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 Maigon DPA via e-mail

The e-mail 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.

Maigon uses Sendgrid to send and receive e-mails. Sendgrid is based in the United States of America and is certified under the EU – U.S. Privacy Shield.

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Maigon stores statistical information on how many document submissions have been performed from an email address. Maigon does not store any other information connected to the email addresses used to access Maigon DPA.

1.2 When you submit a DPA, it may contain the following personal data:

Maigon DPA processes personal data in the following ways:

- when the service is used by ways of e-mails;
- when cookies are set and read by the online interface for the service; and
- in case personal data is contained in a document that is uploaded to be reviewed with Maigon DPA (we cannot rule out the possibility that unmasked contact details to a e.g. a data protection officer or other point of contact are included in the document).
- also, since you are free to upload whatever text you wish to the Maigon DPA, we understand that this text may include personal data submitted by you, regardless of whether this is relevant to check a DPA or not.

1.3 We use cookies on the Maigon DPA website

- some cookies contain user-identifiers or similar information, which we consider to be personal data and therefore treat as such. Please see our Cookie Policy for more information, click [here](#).

2. PURPOSES AND LEGAL GROUNDS FOR THE PROCESSING

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

<u>We process the personal data for the following purposes</u>	<u>The legal ground and our specific legitimate interests are</u>
(i) To provide Maigon DPA via e-mail, 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 Maigon and the user, namely the Terms and Conditions for Maigon DPA.
(ii) Provide Maigon DPA as requested by you, and therefore we may process personal data as a consequence of how you use Maigon DPA – in other words, because the uploaded DPA may contain personal data.	Our legitimate interest: we want Maigon DPA be a simple and effective tool to use, which is the reason why we permit users to submit information as-is.
(iii) We use cookies to ensure the protection of information that is transferred when using Maigon DPA.	Our legitimate interest: we want to ensure the integrity of the 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 legal tech company 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 Maigon DPA, 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 Maigon DPA. The servers for this are located in Frankfurt, Germany;
- 2) Tawk.to Inc., which provides us with the means to communicate with users requesting demos. Tawk.to is based in the U.S., and the transfer of personal data is made pursuant to the EU – U.S. Privacy Shield. Tawk.to uses sub-processors within the U.S.;
- 3) 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
- 4) the user who has requested an analysis of a DPA.

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

<u>Data</u>	<u>Retention time</u>
E-mail addresses (for providing Maigon DPA)	This data is stored for as long as this is necessary to provide you access to Maigon DPA.
E-mail addresses (for communication regarding Maigon DPA)	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 Maigon DPA. You may delete the cookies yourself any time, using your web browser where the cookies have been placed.

4. RESPONDING TO LEGAL REQUESTS AND PREVENTING HARM

We may access, preserve and share your personal data in response to a legal request (like a search warrant, court order or a subpoena or the like), or when necessary to detect, prevent and address fraud and other illegal activity, to protect ourselves, you and other users, including as part of investigations.

5. YOUR RIGHTS

- 5.1 You have the right to withdraw your prior given consent. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal, and we may continue processing your personal data based on other legal grounds, except for direct marketing.
- 5.2 You have the right to request access and further information concerning the processing of your personal data, or request that we correct, rectify, complete, erase or restrict the processing of your personal data. You have the right to obtain a copy of the personal data that we process relating to you free of charge once (1) every calendar year. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs.
- 5.3 If the processing is based on the legal grounds consent or fulfilment of contract you have the right to data portability. Data portability means that you can receive the personal data that you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transfer such data to another data controllers.

6. CONTACT INFORMATION

- 6.1 To exercise your rights, or if you have any questions regarding our processing of your personal data, please contact us at the following address: contact@maigon.io or Maigon AB Birger Jarlsgatan 6, 114 36 Stockholm. In your letter/email please state your full name. Note that you should sign the request to receive information of the processing of your personal data yourself.
- 6.2 If you have any complaints regarding our processing of your personal data, you may file a complaint to the competent data protection authority. You can find out more about the local data protection authorities under the following link http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

7. CHANGE OF CONTROL

If there is a change of control in our business, we may transfer your information to the new owners for them to continue to provide the Services. The new owners shall continue to comply with the commitments we have made in this Privacy Policy.

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

We are Maigon AB
Contact us here: contact@maigon.io
Or here: Birger Jarlsgatan 6, 114 36 Stockholm

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