

MAIGON'S PRIVACY NOTICE

Last updated: 9 August 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**”) on our website at **maigon.io** (the “**Website**”) and when providing our services, currently comprised of the Maigon Privacy Policy and Maigon DPA (collectively referred to as the “**Services**”).

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 on the 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.

1. PROCESSING OPERATIONS ON THE WEBSITE

1.1 When you contact us, we process the following personal data:

- your name;
- your e-mail 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. Remember to kindly not disclose more personal data than is necessary for us to respond to you.

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, 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.

1.2 We use cookies on the 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.

MAIGON

1.3 Purposes and legal grounds for the processing on the Website

We process the personal data for the following purposes	The legal ground and our specific legitimate interests are
(i) 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 or information from us and reply to you if you have feedback on how we can improve the Services, or if you have questions about the Website, the Services or about Maigon.
(ii) We want to better understand how our Website is used, and to improve on it.	Our legitimate interest: to gain insight into trends regarding visitors and their use of the site.
(iii) We want to be able to reach out with advertising to a relevant audience.	Our legitimate interest: we know that we are a niche business, and we want to be able to reach out to the people who our Services may be relevant for.
	Our reasoning regarding our legitimate interests are further described in a separate section, below.

1.4 Sources, Transfers and storage

The source of the personal data that is contained in text submitted to us comes from you when you communicate with us. The email address is also provided directly by you. Information from cookies are read automatically from your web browser.

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) Hubspot Inc., which is a platform for marketing and sales, based in the U.S.;
- 3) Google, which provides their analytics tool Google Analytics, so that we can analyse the use of our Website and track its performance. For more information about Google’s processing of cookie data in relation to us, please see our Cookie Policy for more information.

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

Data	Retention time
E-mail addresses (for communication, when you reach out to us with an inquiry)	This data is stored for as long as this is necessary to correspond with you. If we have not 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 Website. You may delete the cookies yourself any time, using your web browser where the cookies have been placed.

2. PROCESSING OPERATIONS IN CONNECTION WITH MAIGON DPA

2.1 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 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.

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

Maigon DPA processes personal data in the following ways: 1) when the service is used by ways of e-mail; 2) when cookies are set and read by the online interface for the service; and 3) 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).

We process the personal data for the following purposes	The legal ground and our specific legitimate interests are
(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) 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.
(iii) 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.

Our reasoning regarding our legitimate interests are further described in a separate section, below.

2.3 Transfers and storage for Maigon DPA

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) SendGrid, which supplies email-services to us. SendGrid’s primary processing facilities are in the U.S. The SendGrid Services also use data centres in the United Kingdom, India, and Japan for geo-forwarding;
- 3) Payment service provider Stripe, whose servers are located in the US, in order to process your payment to us regarding the service; and
- 4) the user who has requested an analysis of a DPA.

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

Data	Retention time
E-mail addresses (for providing 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.
E-mail addresses (for communication regarding Maigon DPA)	As for the cookies, the identifiers are stored in your device, and we only access the information when you use the Website. You may delete the cookies yourself any time, using your web browser where the cookies have been placed.
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.

3. PROCESSING OPERATIONS IN CONNECTION WITH MAIGON PRIVACY POLICY

3.1 When you submit a privacy policy, we may process the following personal data:

Since privacy policies must contain the contact information to the personal data controller, and if applicable, the appointed data protection officer and/or controller’s representative, it is possible that this contact information contains personal data; and, since you are free to upload whatever text you wish to the AI, we understand that this text may include personal data submitted by you, regardless of whether this is relevant to check a privacy policy or not.

We process the personal data for the following purposes	The legal ground and our specific legitimate interests are
(i) Provide the service as requested by you, and therefore may process personal data as a consequence of how you use the AI.	Our legitimate interest: we want the AI to be a simple and effective tool to use, which is the reason why we permit users to submit information as-is.
(ii) We use cookies to understand how the AI is used, and by how many people.	Our legitimate interest: we want to improve and develop the AI-website (and future projects) based on how the AI is being used.
(iii) We process your payment method information such as debit card number, bank account information, purchase amount, date of purchase and payment method to be able to charge you for your use of the service.	We need to process your payment method information in order to perform our undertakings in contract entered into between you and us, as the service is not provided free of charge.
	Our reasoning regarding our legitimate interests are further described in a separate section, below.

3.2 Sources, Transfers and storage for Maignon Privacy Policy

The source of the personal data that is contained in text submitted to us either comes from privacy policies, which may or may not be public on the internet, or any other source which the user sees fit to use. If the text is not a privacy policy, and the user agreed to supply the text for the improvement (training) of the AI, the text will be instantly deleted after it is confirmed that it is not a privacy policy.

We transfer the personal data to Amazon Web Services, which provides hosting services for the AI. The servers for this are located in Frankfurt, Germany. Furthermore, we transfer personal data to our payment service provider Stripe, whose servers are located in the US, in order to process your payment to us regarding the service.

We store the personal data regarding payment method information for as long as necessary to comply with applicable bookkeeping legislation (which under Swedish law is the current year and the seven following years). When privacy policies are submitted for training of the AI, we will delete all personal after we have used the privacy policy for the training. We will in no case save such personal data for a period of time that is longer than two years. As for the cookies, the identifiers are stored in your device, and we only store aggregated statistical information that does not constitute personal data.

4. OUR LEGITIMATE INTERESTS

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 or privacy policy, 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, as described in further detail below.

4.1 Website

Since you reached out to us, we think it is reasonable that we process personal data about you in order to communicate with you. As you have accepted our use of cookies and continued to use the site, we also think that you are ok with us using the cookie information to develop the site and to reach out with advertising where relevant.

4.2 Maigon DPA

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 or able to identify you.

4.3 Maigon Privacy Policy

For natural persons that are identifiable from the content of a privacy policy, 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 public. Their expectation might not be that a Swedish legal AI 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.

If the user of the AI submits text that contains personal data but is not a privacy policy, the personal data will be processed when the AI has tried to determine if the text is a privacy policy or not. If the user agreed to supply the text for the improvement (training) of the AI, and the submitted text is determined as not being a privacy policy, it will not be saved. This personal data is instantaneously deleted after the analysis is complete.

As for the cookies, we only store aggregated statistical information for our internal use. It is not possible to identify individual users from this information.

4.4 Further information about legitimate interests

If you are curious about how we have reasoned regarding our legitimate interests, please reach out to us and we will explain this in more detail. If you are not OK with our processing based on legitimate interests, just let us know and we will stop – our contact details are set out below.

5. SAFEGUARDS FOR TRANSFERS TO THIRD COUNTRIES

We use processors and sub-processors based in the U.S., which is a country outside of the EU and the EEA which have not been deemed by the EU Commission to have an adequate level of protection for personal data. To secure the transfers, we make use of suitable safeguards

such as binding corporate rules and standard contractual clauses. We do not rely on the EU – U.S. Privacy Shield for transfers. Please contact us using the details below to obtain a copy of the safeguards we use.

6. 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.

We may also use personal data in order to enforce our terms of use or policies for acceptable use.

7. YOUR RIGHTS

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.

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.

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.

8. CONTACT INFORMATION

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.

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. The national data protection authority in Sweden is [Datainspektionen](#).

9. 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 operate the Website. 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!