Privacy Notice for Casei AS

Effective Date: 23.11.2024

At Casei, we are committed to safeguarding the privacy and security of your personal data.

Casei as a solution is built to revise and improve your legal work with Al-precision. However, employees at Casei do not access the documents that you are working on when using our solution.

With this as a baseline, this Privacy Notice explains how we collect, use, share, and protect your personal data, and outlines your rights in compliance with the General Data Protection Regulation (EU) 2016/679 (GDPR).

1. Data Controller

The Data Controller responsible for your personal data is:

• Company Name: Casei AS

• Company Address: Universitetsgata 2, 0164 Oslo, Norway.

• Email Address: Pamir@casei-ai.com

• Organisational Number: 932 227 339

2. Personal Data We Collect

At Casei, we collect personal data to improve our products, services, and solutions, and to provide you with the best possible user experience. The personal data we may collect includes:

- Identity Data: Full name, and company name.
- Contact Data: Email address and phone number.
- **Technical Data:** IP address, device information, operating system, and usage logs.
- Usage Data: We track how often you use our solution and its features, but we don't store your inputs, AI responses, or any documents you work on. Your documents are never saved or used for training.
- Feedback Data: Customer feedback, queries, or issues raised with our support team.
- Marketing Data: Preferences for receiving communications and responses to marketing content.
- **Communication Data:** Emails and other communication records might be collected if you communicate with us.

3. How We Collect Personal Data

We collect personal data through the following means:

- **Direct Interactions:** When you fill in forms, contact us by email or phone, or interact with us in any other way.
- **Automated Technologies:** We use cookies, server logs, and similar technologies to collect Technical Data as you interact with our website or digital tools.
- **Third Parties:** We may receive personal data from third-party services or partners, such as your authentication provider and your employer.

4. Purpose and Legal Basis for Processing Personal Data

We process personal data to the extent necessary to market, offer, and enable you to make use of our Solution, and to fulfil our legal obligations. Our purpose of processing and its associated legal basis is as follows:

| Purposes of Processing | Legal Basis for Processing | Category of Personal Data |
|--|--|---|
| Account Registration: We need to process your contact information for you to register an account with us. | The legal basis for our processing is the necessity to enter into and fulfil a contract with you, pursuant to Article 6(1)(b) of the GDPR. | Identity, Contact, Technical, Usage, and Communication |
| Analysis: Analysis to improve our Solution. Analysis will use aggregated and anonymized personal data, which will not be used to identify you as a person. | The legal basis is our legitimate interest, pursuant to Article 6(1)(f). | Technical and Usage |
| Communications: We process any personal data you share with us if you directly contact us by e-mail or phone. | Your consent provided pursuant to Article 6(1)(a). You may withdraw consent at any time. | Identity, Contact, Feedback, Marketing, and Communication |
| Disputes and Support: Handle disputes and provide assistance. | The legal basis is our legitimate interest, pursuant to Article 6(1)(f). | Identity, Contact, Feedback, Marketing, and Communication |
| Improvement: Monitor, maintain, train, test, improve, and analyse the Solution. | The legal basis is our legitimate interest, pursuant to Article 6(1)(f). | Technical and Feedback and Usage Data |
| Internal Processing: Conduct internal | The legal basis is our legitimate interest, pursuant to Article 6(1)(f). | Identity, Technical, Feedback and Usage Data |

| investigations and risk assessments. | | |
|---|--|---|
| Marketing: We collect information about your interaction with our Solution, advertising preferences, and communications with us. | The legal basis is our legitimate interest, pursuant to Article 6(1)(f). | Identity, Contact, Marketing, and Communication |
| Reporting Obligations: We must process your personal data to comply with relevant tax and financial reporting requirements and regulations. | Our legal basis for processing personal data to comply with a legal obligation is pursuant to Article 6(1)(c). | Identity, Contact, Technical, and Usage Data |

5. Data Sharing and Disclosure

We do not share your personal data with third parties unless there is a legal basis, such as an agreement with you or a legal obligation. We may share your data with trusted third parties on a least privilege-principle in the following contexts:

- **Service Providers:** To support our business operations, such as IT services, cloud hosting, payment processing, data management, and customer support.
- Our customers and suppliers: Customers (i.e. your employer), suppliers (i.e.
 Microsoft, see below) and partners that assist Casei with delivering our solutions to you,
 or that assist us with improving, analysing, reviewing, and developing new features and
 solutions.
- **Business Transactions:** In the event of a merger, financing, acquisition, bankruptcy or sale of Casei.
- **Legal Compliance:** When required by law or to protect our rights, we may disclose data to regulatory bodies, law enforcement, or government authorities.
- **Third parties:** Disclosing your personal data with third parties beyond what's mentioned above shall only find place with your consent.

We use the following data processors to handle personal data on our behalf:

| Name | Purpose | Data Category | Location | Legal Entity |
|-----------|---|--|----------|---|
| Microsoft | Hosting and Search Infrastructure | Identity, Technical, Usage, Communication | EEA/EU | Microsoft Corporation, One Microsoft Way, Redmond, |

| USA |
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6. Data Retention

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected or to comply with legal, regulatory, or internal policy obligations. Once no longer needed, your data will be securely deleted or anonymized.

7. Security

We deeply care about the protection of your personal data by following industry standards and procedures to prevent loss, misuse, unauthorised access, or alteration. This includes secure disposal of data.

Access to your data is limited to authorised personnel with confidentiality obligations, and our systems are housed in secure facilities.

8. Your GDPR Rights

You have the following rights under the GDPR:

- **Right to Withdraw Consent:** Withdraw your consent for data processing where we rely on your consent as legal basis for processing.
- **Right to Access and Information:** Request access to the personal data we hold about you. This includes details on how and what categories of personal data we process.
- Right to Rectification: Correct inaccurate or incomplete data.
- Right to Restrict Processing: Request restriction of processing your personal data where you believe your data is inaccurate or being processed unlawfully.
- **Right to Data Portability:** Receive your data in a structured format and request its transfer to another provider.
- Right to Erasure (Right to be Forgotten): Request the deletion of your personal data in certain circumstances.
- **Right to Object:** Object to the processing of your personal data based on legitimate interests.

9. Cookies

We use essential cookies to identify users, which is necessary to deliver our solution to you. We do not use optional cookies to collect personal data for marketing.

10. Complaints

If you believe we have not complied with the GDPR or your data protection rights, you have the right to lodge a complaint with a supervisory authority, particularly in the EU member state where you reside or work. In Norway, it is <u>Datatilsynet</u>.

11. Changes to This Privacy Notice

We may update this Privacy Notice from time to time. Any changes will be posted on this page, and where necessary, notified to you via email or other communication channels.

12. Contact Us

If you have any questions regarding this Privacy Notice, our data processing practices, or wish to exercise your GDPR rights, please contact us at pamir@casei-ai.com.