

Privacy Policy

Effective date: 24 April 2026

This Privacy Policy explains how **A Cloud Frontier ApS**, CVR no. **37174181**, with registered address at **Ivigtutvej 2, 9210 Aalborg SØ**, Denmark ("**Hal**", "**we**", "**us**") processes personal data in connection with the HAL software-as-a-service platform at gethal.ai (the "**Service**").

This policy covers the processing of personal data **about our business customers and their users**. A separate **Data Processing Agreement (DPA)** governs the processing of personal data that our customers instruct us to handle on their behalf (e.g. data about their prospects and leads) — see section 3 below.

1. Controller

The data controller for the processing described in this policy is:

A Cloud Frontier ApS CVR no. 37174181 Ivigtutvej 2, 9210 Aalborg SØ Denmark Email: jan.verdier@acloudfrontier.com

2. Who This Policy Applies To

This policy applies to:

- representatives, administrators, and end users of our **business customers** who access the Service; and
- visitors who contact us via email or sign up for an account.

The Service is intended only for business use. We do not knowingly offer it to consumers or to children under 16.

3. Two Roles: Controller vs. Processor

We process personal data in two distinct capacities. It matters which applies, because your rights differ in each case.

(a) As controller — for personal data about our customers and their users: account registration data, billing information, support correspondence, and usage telemetry. This policy describes that processing.

(b) As processor — for personal data that our customers upload to, or instruct the Service to collect about, third parties (for example, names, work email addresses, job titles, and company affiliations of prospects the customer wants to contact). Here, our customer is the controller and decides the purposes. We process such data only on the customer's documented instructions, under the terms of our DPA. **If you are a prospect or lead and want to exercise your rights in relation to that data, please contact the customer who initiated contact with you.** We will assist that customer in responding to your request.

4. What Personal Data We Collect (as Controller)

Category	Examples	Source
Account data	Name, business email, phone, job title, employer, password hash	You, when creating an account
Billing data	Company name, VAT number, billing address, billing email, top-up records, credit balance	You; payment provider
Usage data	Log-in timestamps, IP address, browser/device, pages viewed, features used, API calls, error logs	Automatically, via the Service
Communications	Emails, support tickets, chat messages	You; our support tools

5. Why We Process It, and on What Legal Basis

Under the GDPR we rely on the following legal bases:

- **Performance of a contract (Art. 6(1)(b))** — to create and manage your account, deliver the Service, process top-ups, and provide support. Without this data we cannot provide the Service.
- **Legitimate interests (Art. 6(1)(f))** — to secure the Service against abuse and fraud, maintain server and application logs, and (for existing business customers) send direct B2B marketing about similar services. You can object at any time by contacting us.
- **Legal obligation (Art. 6(1)(c))** — to comply with accounting, tax, and bookkeeping obligations under Danish law (notably the Bookkeeping Act, "Bogføringsloven"), to respond to lawful requests from authorities, and to comply with the GDPR itself.
- **Consent (Art. 6(1)(a))** — where we ask for it explicitly, for example for marketing to non-customers. You can withdraw consent at any time.

We do not use your personal data, or any Customer Data, to train artificial-intelligence models. We do not sell personal data.

6. Who We Share Personal Data With

We share personal data only with the following categories of recipients, under appropriate contractual safeguards:

- **Infrastructure provider** — Google Cloud (including Cloud Run) for hosting and storage.
- **AI model provider** — **Anthropic PBC** (Claude), to operate HAL's reasoning capabilities. Prompts and outputs are sent to Anthropic to produce results. We use API configurations under which Anthropic does not use our data to train its models.
- **Email provider** — **Microsoft Ireland Operations Limited** (Microsoft 365) for sending account and transactional email. Billing receipts are sent automatically by Stripe.
- **Payment provider** — **Stripe Payments Europe Limited** (Ireland) for processing credit top-ups. Card data is handled directly by Stripe under its own privacy policy (stripe.com/privacy); we do not store full card numbers.
- **Professional advisors** — auditors, accountants, and lawyers, under confidentiality.
- **Authorities** — where required by law, a court order, or to protect our rights.

A current list of our sub-processors (relevant to our processor role under the DPA) is maintained at gethal.ai/subprocessors.

7. International Transfers

Some of our service providers are established outside the European Economic Area, notably in the United States. Where personal data is transferred outside the EEA, we rely on:

- the European Commission's adequacy decisions, where they apply (including the EU-US Data Privacy Framework for certified recipients); or
- **Standard Contractual Clauses** approved by the European Commission, combined with supplementary technical and organisational measures as appropriate.

You can request a copy of the relevant safeguards by contacting us at jan.verdier@acloudfrontier.com.

8. Retention

We keep personal data only for as long as necessary:

- **Account data** — deleted **without undue delay** after your account is closed, except where law requires longer retention.
- **Billing and transaction records** — retained at least **5 years** from the end of the financial year, as required by the Danish Bookkeeping Act.

- **Usage logs** — typically up to 12 months, shorter where possible.
- **Support correspondence** — up to 3 years after the matter is closed.

After the retention period, data is deleted or anonymised. Deletion is irreversible; we do not maintain backups after deletion.

9. Your Rights

Subject to the conditions in the GDPR, you have the right to:

- **access** your personal data and receive a copy of it;
- **rectify** inaccurate or incomplete data;
- **erase** your data ("right to be forgotten");
- **restrict** processing in certain circumstances;
- **data portability** — receive your data in a structured, commonly used, machine-readable format;
- **object** to processing based on legitimate interests, including for direct marketing; and
- **withdraw consent** at any time, where processing is based on consent.

To exercise your rights, email jan.verdier@acloudfrontier.com. We will respond within one month (extendable by two further months for complex requests). There is no fee unless the request is manifestly unfounded or excessive.

If you are unsatisfied with how we handle your personal data, you have the right to lodge a complaint with the Danish Data Protection Agency:

Datatilsynet Carl Jacobsens Vej 35 · 2500 Valby · Denmark dt@datatilsynet.dk · www.datatilsynet.dk

10. Security

We implement appropriate technical and organisational measures to protect personal data, including encryption in transit, access controls, least-privilege permissions, logging and monitoring, secure software development practices, vendor due diligence, and staff confidentiality obligations. No system is perfectly secure; we continue to review and improve our measures.

11. Automated Decisions

We do not make decisions based solely on automated processing that produce legal or similarly significant effects on the individuals described in this policy.

The Service itself uses AI to assist our customers in their sales workflows; decisions about whether to contact or engage with a prospect are made by the customer, not by the Service in isolation.

12. Changes to This Policy

We may update this policy from time to time. Material changes will be notified by email or in-app notice at least **30 days** in advance where feasible. The "Effective date" at the top reflects the latest version.

13. Contact

Questions about this policy or our data practices:

A Cloud Frontier ApS Ivigtutvej 2, 9210 Aalborg SØ, Denmark Email: jan.verdier@acloudfrontier.com