



Sana AI Privacy Notice

Last updated: October 15, 2023

We want you to feel safe when we process your personal data. Our Privacy Notice explains our privacy practices when we are acting as a data controller relating to Sana AI users. Sana AI is hereinafter referred to as "the services".

You either use our services as:

- i) a consumer user ("**Consumer User**"), for example, if you have signed up for our services yourself, visiting our website; or
- ii) a user representing a customer or potential customer of ours ("**User of Company Subscriber**"), for example, if you are invited to use the services by your employer.

Sana as a data processor

If you are a User of a Company Subscriber, we process your personal data in the capacity of data processor and a service provider, when providing the services to the Company Subscriber (i.e., the entity that e.g. invited you to use the services, such as your employer) or to a prospect (which would be the case if you sign up for a trial).

In relation to such processing, the company that you are linked to acts as data controller and is hence responsible for providing information to you about its processing of personal data and addressing your rights as a data subject. We encourage you to contact the relevant company for any privacy questions or concerns.

We will endeavor to provide assistance to our company customers and prospects to address any privacy concerns you may have.

1. General

Sana Labs AB, reg. no. 559060–6579 ("**Sana**," "**us**," "**we**," or "**our**") is committed to protecting and respecting your privacy.

This Privacy Notice ("**Privacy Notice**") explains our privacy practices relating to users of our services.

2. Data controller

Sana is the data controller for the processing of your personal data detailed in this Privacy Notice. If you have any questions regarding the processing of your personal data, you will find our contact details at the end of this Privacy Notice.

3. Our use of your personal data

3.2 Categories of personal data processed

- User:** Your name, email, username, password, alphanumeric identifiers, access level and system role, profile picture, and other attributes that you have provided.
- Content:** Video, text, audio, and image files; search queries; third-party content from pre-approved integrations.
- Payment:** Data about billing address and method of payment, date, and time for completed transaction as communicated by our payment service.
- Social Media:** We have pages on social media sites like Instagram, Facebook, Medium, Twitter, YouTube, and LinkedIn. When you interact with our social media pages, we will collect personal data that you elect to provide to us, such as your contact details. In addition, the companies that host our

social media pages may provide us with aggregate information and analytics about your social media activity.

- Transaction:** Data about purchases of Sana services or transactions.
- Usage:** Data about your activity on and use of our services, such as app launches within our services, including page history, search history, product interaction, crash data, performance and other diagnostic data, and other usage data.
- Device:** IP address, browser type, operating system, city and country, device type, MAC address.
- Other Information You Provide to Us:** Details such as the content of your communications with Sana, including interactions with customer support and contacts through social media channels.

3.3 How we process your personal data for each purpose

Below you can find more information about our processing of your personal data in relation to our purposes of processing:

Purpose: If you are a Consumer User, to provide and manage our services.		
Categories of personal data: <ul style="list-style-type: none"> ● User ● Content ● Payment ● Social Media ● Transaction ● Usage ● Device ● Other Information You Provide to Us 		
What we do: We process your personal data to provide you with our services and use of our services and to communicate with you.	Legal basis: The processing is necessary for the purpose of fulfilling the agreement with you, including administering our services.	Retention period: Personal data stored to provide and manage our services will be stored during the time period that it is necessary to fulfill the purposes with our processing, which is usually as long as you have an account to use our services or websites, or as set forth in our agreement. We may also need to store your personal data for a reasonable time thereafter to fulfill any surviving terms of our agreements.
Recipients of personal data: We may in some cases share your personal data for this purpose with third parties, such as our service providers.		

Purpose: If you are a User of a Company Subscriber, to administer the agreement with the Company Subscriber that you represent.

- Categories of personal data:**
- Payment
 - Transaction
 - Other Information You Provide to Us

What we do: We process your personal data to be able to administrate the agreement with the Company Subscriber by processing information such as the contact person at the Company Subscriber.	Legal basis: The processing is necessary for our legitimate interest in processing your personal data to administer the agreement with our customers, which we assess, outweighs the data subjects' interest in privacy.	Retention period: Personal data stored to administer the agreement with our customer will be stored during the time period that it is necessary to fulfill the purposes with our processing, which is usually as long as the agreement is valid, and you are the appointed contact person or similar. We may also need to store your personal data for a reasonable time thereafter to fulfill any surviving terms of our agreement with our customer.
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Purpose: Administration and provision of support services and account services.

- Categories of personal data:**
- Payment
 - Transaction
 - Other Information You Provide to Us

What we do: We process your personal data to provide our support services, account services.	Legal basis: The processing is necessary for our legitimate interest of processing your personal data to administer the provision of our services, which we assess outweighs the data subjects' interest in privacy.	Retention period: Personal data stored to administer the provision of the services will be stored during the time period that it is necessary to fulfill the purposes with our processing, which is usually as long as you are a user of the services. We may also need to store your personal data for a reasonable time thereafter to administer the ending of your account and fulfill any terms of our agreement with our customer.
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Recipients of personal data:
We may in some cases share your personal data for this purpose with third parties, such as our service providers.

Purpose: To improve our services by training our algorithms.

<p>Categories of personal data:</p> <ul style="list-style-type: none"> ● User ● Content ● Payment ● Social Media ● Transaction ● Usage ● Device ● Other Information You Provide to Us 		
<p>What we do:</p> <p>We process your personal data to improve our services by training our algorithms for the purposes of improving search results ranking, user experience and application infrastructure.</p> <p>We do not process your personal data to train generative AI models and will ensure that the personal data processed for this purpose is pseudonymized and anonymized to the extent possible for us to fulfill the purpose of processing.</p>	<p>Legal basis:</p> <p>Processing is necessary for our legitimate interest in improving our services by training our algorithms, which we assess outweighs the data subjects' interest in privacy.</p> <p>We will ensure the personal data is pseudonymized and anonymized to the extent possible for us to fulfill the purpose of processing.</p>	<p>Retention period:</p> <p>We store your personal data as long as necessary to train and improve the algorithms used in our services. We will not store such personal data for a longer time period than one year without anonymizing it.</p>
<p>Purpose: For statistics, analysis, and business development.</p>		
<p>Categories of personal data:</p> <ul style="list-style-type: none"> ● User ● Content ● Payment ● Social Media ● Transaction ● Usage ● Device ● Other Information You Provide to Us 		
<p>What we do:</p> <p>We use your personal data within our market and customer analyses of our services which mainly constitute usage statistics and data from customer analyses.</p> <p>We also use third party tracking services to provide relevant and tailored services. We do not share your personal data with our affiliates and / or partners of Sana.</p> <p>The result of our analysis is used to get insight into the needs of our users and Company Subscribers.</p> <p>We will ensure the personal data is pseudonymized and anonymized to the extent possible for us to fulfill the purpose of processing.</p>	<p>Legal basis:</p> <p>Processing is necessary for our legitimate interest in analyzing the use of our services and websites to improve our business and services or develop new services, which we assess outweighs the data subjects' interest in privacy.</p> <p>Your consent, in relation to the processing of personal data in the form of cookies that is not necessary for the function of the service, to analyze the use of our website and our services.</p> <p>We will ensure the personal data is pseudonymized and anonymized to the extent possible for us to fulfill the purpose of processing.</p>	<p>Retention period:</p> <p>Personal data stored to create statistics, analysis, and business development will be retained as long as necessary to fulfill the purpose, but no longer than one year without anonymizing it.</p>
<p>Recipients of personal data:</p>		

We may in some cases share your personal data for this purpose with third parties, such as our service providers.

Purpose: To prevent fraud and other abuse.

Categories of personal data:

- User
- Content
- Payment
- Social Media
- Transaction
- Usage
- Device
- Other Information You Provide to Us

What we do:

We process your personal data to prevent fraud and other abuse of our services.

Legal basis:

Processing is necessary for our legitimate interest of preventing fraud related to our services and ensuring that our services and/or websites are not used for other purposes than intended which overrides the interest of protection of your privacy.

Retention period:

We will store your personal data for the purposes to prevent fraud and other abuse as long as it's necessary to fulfill the purpose but no longer than one year.

Recipients of personal data:

We may in some cases share your personal data for this purpose with third parties, such as law enforcement.

Purpose: To comply with legal obligations.

Categories of personal data:

- User
- Content
- Payment
- Social Media
- Transaction
- Usage
- Device
- Other Information You Provide to Us

What we do:

We process your personal data to comply with our legal obligations under applicable law.

Legal basis:

We need to process personal data to comply with our legal obligations under applicable legislation, such as the Anti-Money Laundering Act, the Accounting Act and to respond to your request to exercise your rights under the GDPR.

Retention period:

We will store your personal data as long as necessary for us to fulfill our legal obligations. Personal data processed to fulfill legal obligations in the Accounting Act will be stored for seven years, following the end of the calendar year during which the financial year ended. Data processed to fulfill the Anti-Money Laundering Act will be stored for five to ten years depending on the circumstances.

Recipients of personal data:

We may in some cases share your personal data for this purpose with third parties, such as tax authorities.

Purpose: To establish, exercise, and defend against legal claims.

<p>Categories of personal data:</p> <ul style="list-style-type: none"> All of the above. 		
<p>What we do:</p> <p>In case of a dispute, we are entitled to process your personal data to establish, exercise, or defend the legal claim.</p>	<p>Legal basis:</p> <p>Processing is necessary for the purposes of our legitimate interests of the establishment, exercise, or defense of legal claims. In case of a dispute, we are entitled to process your personal data since we assess that our interest in safeguarding our interests in a dispute overrides your interest in the protection of your privacy.</p>	<p>Retention period:</p> <p>We will store your data for the purposes of establishing or defending Sana against legal claims for as long as you can make legal claims against us. This means that we may store personal data during any warranty period and until any limitation period has expired. The general statutory limitation period in Sweden is ten years under the Act on Limitations.</p>
<p>Recipients of personal data:</p> <p>We may in some cases share your personal data for this purpose with third parties, such as legal advisors.</p>		
<p>Purpose: To enable mergers, divestitures, restructuring, reorganization, dissolution, and other sale or transfers of Sana' assets.</p>		
<p>Categories of personal data:</p> <ul style="list-style-type: none"> All of the above. 		
<p>What we do:</p> <p>In case of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of Sana Lab's assets we may need to process your personal data to enable such transfer.</p>	<p>Legal basis:</p> <p>Processing is necessary for the purposes of our legitimate interests of enabling mergers, divestitures, restructuring, reorganization, dissolution and other sale or transfers of Sana' assets which we assess overrides your interest in the protection of your personal data.</p>	<p>Retention period:</p> <p>The personal data will be processed as long as necessary to fulfill the purpose of the processing. Personal data that is transferred to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Sana' assets will not be stored by Sana after such transfer unless required to fulfill any of the other purposes set out above.</p>
<p>Recipients of personal data:</p> <p>We may in some cases share your personal data for this purpose with third parties, such as professional advisors, e.g., accountants and legal advisors.</p>		

4. Collection of personal data

4.1 Personal data you provide to us

The personal data that we process about you is data that you have provided us with or that we have otherwise acquired as part of the provision of our services. We collect personal data:

- If you are a User of a Company Subscriber, when we initiate a business relationship with you;
- When you create an account to use our services or create a new user for that account;

- When you submit user-interaction data to our services;
- When you complete transactions through our websites, such as fulfilling an order for our services;
- When you perform search queries on our websites;
- When you contact our support team;
- Through online forms and otherwise through our websites;
- When you apply for a job;
- When you seek general information about the company;
- Through emails sent to and from Sana; and
- When you share information with us through other means, such as meetings, conversations, social media, or online forms.

4.2 Personal data that we collect from other sources

We may also collect or receive information about you from other sources such as public registers. If you are a User of a Company Subscriber, we may collect personal data provided by the company subscriber, for example when the company subscriber invites you to use the services. We may collect personal data from other sources such as:

- If you are a User of a Company Subscriber, the company subscriber;
- Public registers;
- UC (a business and credit reference agency);
- Swedish Companies Registration Office (Sw. Bolagsverket);
- LinkedIn Website Retargeting;
- Google Analytics (Google Ireland Limited);
- Google Tag Manager (Google Ireland Limited);
- G2 (G2.com),
- Clearbit (APIHub, Inc.),
- Cognism (Cognism Limited), and
- Facebook Ads conversion tracking (Facebook pixel) (Facebook Ireland Ltd).

5. Automated decision-making

We do not use processes for automatic decision-making.

6. Retention of personal data

We retain your personal data only for as long as necessary for the purposes for which we originally collected the data in accordance with this Privacy Notice. When we no longer need to save your data, we will remove it from our systems, databases, and backups. The retention time depends on the context and cannot in all cases be specified, in that case, we will provide information about the factors deciding the retention time.

If return or destruction is impracticable or incidentally prohibited by a valid legal order, Sana shall take measures to inform you and block such personal data from any further processing (except to the extent necessary for its continued hosting or processing required by applicable law) and shall continue to appropriately protect the personal data remaining in its possession, custody, or control and, where any authorized sub-processor continues to possess personal data, require the authorized sub-processor to take the same measures that would be required of Sana.

For more detailed information on how long we retain your personal data in relation to our purposes of the processing, see Section 3.

7. With whom do we share your personal data?

We may share personal data with third parties that are trusted recipients and with whom we have an agreement ensuring that your personal data is processed in accordance with this Privacy Notice. We may share data with:

- Our subsidiaries and affiliates;
- Other third party service providers, e.g. GCP and OpenAI, that may change from time to time;
- A buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Sana' assets;

In certain circumstances, we may also need to disclose personal data upon the request from authorities or to third parties in connection with court proceedings or business acquisition or combination processes, or other similar processes.

We will not sell your personal data.

8. Where do we use your personal data?

Sana will process your personal data within the EU/EEA. However, we occasionally need to transfer personal data to third countries, either directly or through our sub-processors. If we engage in such transfer, we will ensure that there is a legal basis for the transfer and that the level of protection is equivalent to that applicable within the EU/EEA, either by ensuring that the country has an adequate level of protection, that we have taken adequate protective measures such as the European Commission's standard contractual clauses, that you have given your explicit consent or that the transfer is necessary with regards to the purposes set out in article 49 of the GDPR. We may also transfer personal data to participants of the Data Privacy Frameworks (DPF) as set forth by the US Department of Commerce regarding the collection, use and retention of personal data from the EEA, Switzerland, and the UK, respectively.

9. Your rights

9.1 Our responsibilities for your rights

In the capacity of data controller, we are responsible for ensuring that your personal data is processed in compliance with applicable laws and that you can exercise your rights. You may contact us at any time if you wish to exercise your rights. You will find our contact details at the end of this Privacy Notice.

We have an obligation to respond to your requests to exercise your rights within one month of receiving your request. If your request is complex or if we have received many requests, we have the right to extend this deadline to two more months. If we are unable to take the action you request within one month, we will inform you of the reason for the delay and of your right to lodge a complaint with a supervisory authority and to seek judicial remedy.

You will not be charged for requesting information, for communication, or measures that we carry out. However, if your request is manifestly unfounded or excessive, we may charge an administrative fee for providing the information or taking the action requested or refuse to act on your request altogether.

9.2 Your rights to access, rectification, erasure, and restriction

You have the right to request:

Access to your personal data. This means that you have the right to request access to the personal data that we hold about you. You also have the right to be provided, at no cost, a copy of the personal data about you that we are processing. We have the right to charge a reasonable administration fee if you request further copies. If you make a request in electronic form, e.g., via email, we will provide you with the information in a commonly used electronic format.

Rectification of your personal data. At your request or on our own initiative, we will correct, anonymize, delete or complement data that is inaccurate, incomplete, or misleading. You also have the right to complete any incomplete personal data if something relevant is missing.

Erasure of your personal data. You have the right to request that we delete your personal data if there is no compelling reason for us to continue processing the data. Personal data should therefore be erased if:

- it is no longer needed for the purpose for which we collected it;
- we process your personal data based on the consent provided by you and you withdraw your consent;
- you object to us processing your data based on a legitimate interest assessment and we have no compelling interest that overrides your interests and rights;
- we have processed the personal data unlawfully;
- or we have a legal obligation to erase personal data.

However, there may be legal requirements or other compelling reasons that prevent us from immediately erasing your personal data. We will then stop processing your personal data for purposes other than in compliance with the law or where there are no compelling legitimate grounds for doing so.

In the event you would like to exercise your right for the erasure of your personal data, please use [this form](#) and send an email with the subject line “Erasure of Personal Data Request” and the completed form attached to legal@sanalabs.com. We will confirm receipt of the completed form and take reasonable steps to ensure you are the data subject. Upon verification, we will complete the erasure without undue delay.

Restriction of processing. This means that we temporarily restrict the processing of your data. You have the right to request restriction when:

- you consider your data to be inaccurate and you have requested rectification as defined above, while we establish the accuracy of the data;
- the processing is unlawful and you do not want the data to be erased;
- as the personal data controller, we no longer need the personal data for our processing purposes, but you need them to be able to establish, exercise, or defend a legal claim;
- or you have objected to processing as defined in Section 9.3.1, while waiting for us to consider whether our legitimate interests override yours.

We will take all reasonable measures possible to notify everyone who has received personal data as stated in Section 7 above if we have rectified, erased, or restricted access to your personal data after you have requested us to do so.

Your right to object to processing

You have the right to *object* to the processing of your personal data if our processing is based upon legitimate interests (see Section 3 above). If you object to such processing, we will only continue to process your data if we have compelling reasons for doing so that override your interests.

If you do not wish that we use your personal data for direct marketing, you have the right to object to such processing by contacting us. We will cease to use your data for that purpose when we have received your objection.

Your right to withdraw your consent

When we need your consent to process your personal data, you always have the right to *withdraw* such consent at any time by contacting us.

Your right to data portability

You have the right to *data portability*. This means the right to receive your personal data in a structured, commonly used, and machine-readable format, and to request that these data are transferred to another personal data controller. The right to data portability only applies when the processing is being carried out by automated means and our lawful basis for processing your data is the performance of an agreement between you and us or your consent.

Your right to complain to a supervisory authority

You have the right to lodge a complaint with the Swedish Data Protection Authority (*Sw. Integritetsskyddsmyndigheten*) if you are not satisfied with our processing of your personal data.

10. Protection of your personal data

We always want you to feel confident about providing us with your personal data. We have therefore taken appropriate security measures to protect your personal data against unauthorized access, alteration, and erasure. Even though we work hard to protect your data, no security measures are perfect or impenetrable. Should a security breach occur that may materially impact you or your personal data, e.g., risk of fraud or identity theft, we will contact you to explain what action you can take to mitigate potential adverse effects of the breach.

We strongly advise you to be cautious and to protect your own personal data. You are responsible for keeping your passwords confidential and avoiding others from observing your personal data when using our services in public spaces.

11. Children and Personal Data

Our services are not directed to children under the age of 13. Sana does not knowingly collect personal data from children under the age of 13. If you have reason to believe that a child under the age of 13 has provided personal data to Sana through the services, please email us at legal@sanalabs.com. We will investigate any notification and if appropriate, delete the personal data from our systems. If you are 13 or older, but under 18, you must have consent from your parent or guardian to use our services.

12. Cookies

We use cookies that may include personal data to improve, analyze and administer our websites and services and your experience of them. You can find more information about this in our [Cookie Notice](#).

13. Changes to the Privacy Notice

We have the right to make changes to this Privacy Notice at any time. We will inform you of these changes, as appropriate.

14. Contact details

Do not hesitate to contact us if you have any questions about this Privacy Notice, our processing of your personal data, or if you wish to exercise your rights.

Sana Labs AB, reg. no. 559060–6579; E-mail: legal@sanalabs.com; Website: <https://www.sanalabs.com/>