

## **Privacy Policy**

### **1. Controller and Contact Information**

StreamLogic BV ("StreamLogic", "we", "us", or "our") is an IT service provider based in the Netherlands, located in Blaricum, and registered with the Dutch Chamber of Commerce (KvK) under number 98767313.

StreamLogic BV acts as the **data controller** for the processing of personal data as described in this privacy policy.

For questions regarding this policy or the processing of your personal data, you can contact us at:

**Email:** [info@streamlogic.nl](mailto:info@streamlogic.nl)

### **2. Personal Data We Process**

#### **2.1 Data you provide**

When using CLARITY, our PDF accessibility tool, we process:

- Uploaded PDF documents
- Account information (such as name, email address, and company name)

#### **2.2 Automatically collected data**

We may automatically collect:

- IP address
- Browser type and version
- Device information
- Usage and interaction data

### **3. Purposes of Processing**

We process personal data for the following purposes:

- To convert uploaded PDF files into accessible formats
- To provide, operate, and maintain our services
- To improve functionality, performance, and user experience
- To ensure system security, integrity, and prevent misuse
- To provide customer support and respond to inquiries

### **4. Legal Basis for Processing**

We process personal data based on the following legal grounds:

- **Performance of a contract:** to provide the CLARITY service
- **Legitimate interest:** for service improvement, security, and operational management
- **Consent:** where applicable, such as for cookies or optional features

## 5. Provision of Data

Providing personal data is necessary to use our services.

If required data is not provided, we may be unable to deliver the requested functionality.

## 6. Processing of Uploaded Documents

Uploaded PDF files are processed solely for the purpose of converting them into accessible documents.

- Processing is fully automated
- Access to document content is strictly restricted and only permitted where necessary for technical support, subject to appropriate authorization and controls
- Files are deleted within **24 hours** after processing

We **do not use uploaded documents or their content** for training machine learning or AI models.

We may use **technical metadata** related to document processing (such as structural transformation patterns), which does not include personal data or document content, to improve service performance.

## 7. Data Retention

We retain personal data only for as long as necessary for the purposes described above:

- Uploaded files: deleted within 24 hours
- Log data: retained for up to 1 year for security, monitoring, auditing, and fraud prevention
- Analytics data: retained for up to 12 months

## 8. Data Sharing and Processors

We do not sell personal data.

We may share personal data with trusted third-party service providers ("processors") who support the delivery of our services, including:

- Hosting and cloud infrastructure providers
- IT and security service providers
- Analytics and monitoring services

These processors act on our behalf and process personal data only in accordance with our instructions and applicable data protection laws. Appropriate data processing agreements are in place where required.

## **9. International Data Transfers**

Where personal data is transferred outside the European Economic Area (EEA), we ensure appropriate safeguards are implemented, such as the use of **Standard Contractual Clauses (SCCs)** approved by the European Commission.

## **10. Security Measures**

We implement appropriate **technical and organizational measures** to protect personal data, in line with industry standards and ISO 27001 principles, including:

- Encryption of data in transit (HTTPS/TLS)
- Access control and authentication mechanisms
- Least-privilege access principles
- Secure system architecture and monitoring
- Regular review of security practices and controls

## **11. Automated Processing**

Our service uses automated processing to convert PDF documents into accessible formats.

This processing does not result in decisions that produce legal effects or similarly significant consequences for individuals.

## **12. Your Rights**

Under the General Data Protection Regulation (GDPR), you have the right to:

- Access your personal data
- Rectify inaccurate or incomplete data
- Request erasure of your data
- Restrict processing
- Object to processing

- Request data portability

Where processing is based on consent, you may withdraw your consent at any time.

Requests can be submitted via: [info@streamlogic.nl](mailto:info@streamlogic.nl)

### **13. Cookies**

We use cookies and similar technologies to enhance user experience and analyze usage.

For detailed information, please refer to our separate Cookie Policy.

### **14. Complaints**

If you have concerns about how we handle your personal data, we encourage you to contact us first so we can address your concerns.

You also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

### **15. Changes to this Privacy Policy**

We may update this privacy policy from time to time. The most current version will always be available on our website.