

Carbbin Technologies SL Privacy Policy

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1. Introduction

Carbbin Technologies SL (“we”, “us”, “our”) is committed to protecting your privacy in accordance with the European Union General Data Protection Regulation (GDPR), the applicable Spanish data protection laws, and other relevant regulations. This Privacy Policy explains how we collect, use, retain, and secure your personal data and informs you of your rights.

2. Data We Collect

We collect the following types of data:

- **Personal Information:** Your name, email address, billing details, and other information you provide during registration or subscription.
- **Usage Data:** Information about how you use our service, including device details, IP address, browser type, and pages visited.
- **Reports Data:** Data used to generate reports, which may be anonymised or aggregated.

- **Cookies and Similar Technologies:** Data collected via cookies to enhance your user experience.

3. How We Use Your Data

We use your personal data for these purposes:

- **Service Provision:** To provide and maintain our service, manage subscriptions, and process billing (legal basis: contractual necessity and legal obligation).
- **Analytics and Service Improvement:** To analyse usage and improve our offerings (legal basis: legitimate interests).
- **Automated Report Generation:** To generate automated reports using external language models (e.g., OpenAI). These reports are produced with minimal human input and are for informational and analytical purposes only.
- **Communication:** To send you updates, offers, and support information (legal basis: consent where required).

4. Legal Basis for Processing

As a company incorporated in Spain, we comply with both the GDPR and Spanish data protection requirements. Our processing is based on one or more of the following legal bases:

- **Contractual Necessity:** For service provision and billing.
- **Legal Obligation:** As required under Spanish law (e.g., for accounting records).
- **Consent:** For marketing communications and non-essential services.
- **Legitimate Interests:** For analytics and service improvements, provided these interests are not overridden by your rights.

(We document our legal basis for each processing activity in our internal records.)

5. Data Retention

We retain personal data only for as long as necessary:

- **Accounting Documents:** Stored for the legally mandated period required under Spanish accounting regulations.
- **Reports Data:** Where data is anonymised, reports may be retained indefinitely.
- **Other Data:** Retained only for the period necessary to fulfil the purposes outlined in this policy.

6. Your Rights

Under the GDPR and Spanish law, you have the following rights:

- **Access:** To request details of the personal data we hold about you.
- **Rectification:** To have inaccurate data corrected.
- **Erasure (“Right to be Forgotten”):** To request deletion of your data when applicable.
- **Restriction of Processing:** To limit how your data is processed.
- **Data Portability:** To receive your data in a structured, commonly used format.
- **Objection:** To object to our processing, including for direct marketing.
- **Automated Decision-Making:** To request human intervention if you are subject to decisions made solely by automated processing.

To exercise any of these rights, please contact us using the details below.

7. Data Security

We rely on industry-standard security measures provided by our trusted third-party providers:

- **Cloud Hosting:** Our primary cloud services are hosted in the South London zone (Oracle).
- **Web Platform:** We use Replit for our web services.
- **Payment Processing:** Stripe is used to handle billing and payment details.

We ensure that these providers adhere to strict security and data protection standards. We will notify the appropriate supervisory authority within 72 hours in the event of a breach.

8. Data Sharing and International Transfers

We may share your personal data with:

- **Service Providers:** Third parties such as Oracle (cloud hosting), Replit (web services), and Stripe (payment processing) under their respective terms of service.
- **Legal Authorities:** When required by law or to protect our rights.

If personal data is transferred outside the EU/EEA, we ensure appropriate safeguards are in place (e.g., standard contractual clauses or adequacy decisions).

9. Automated Processing and External LLMs

Our service includes the generation of automated reports using external language models (e.g., OpenAI) through an agentic workflow. These processes are used solely for providing analytical insights and do not lead to any binding or legally significant decisions. If you have questions or concerns about this automated processing, please contact us.

10. Data Protection Officer and Contact Information

Currently, we have not formally appointed a Data Protection Officer, as our scale of processing does not require one under the GDPR. However, for any data protection inquiries, please contact us at:

- Email: carbbin@carbbin.com

11. Third-Party Agreements

We have accepted the standard terms and conditions of our third-party service providers (Oracle, Replit, and Stripe), which include data protection commitments. We encourage you to review their respective privacy policies for more details on how they safeguard your data.

12. Changes to This Policy

We may update this Privacy Policy periodically. Significant changes will be communicated via our website and/or email. The revised policy will include an updated effective date.

13. Contact and Questions

If you have any questions or concerns about this Privacy Policy or our data processing practices, please contact us at carbbin@carbbin.com.