

Data-Privacy

1. Controller

SemanticMap UG (limited liability)

represented by the CEO Philipp Sowik

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Since our company employs fewer than 20 people and does not have a core activity in the extensive processing of sensitive data or the systematic monitoring of individuals, there is no legal obligation to appoint a data protection officer.

2. Types of Data Processed

We particularly process the following personal data:

- **Contact data** (e.g. name, e-mail address)
- **Access data** (e.g. e-mail address, password [hashed], IP address)
- **Billing and payment data** (e.g. billing address, payment information)
- **Usage data** (e.g. visited pages, access times, browser information, anonymized IP address)
- **Content data** (e.g. uploaded audio or video files, project data, AI-generated analysis results and metadata)

3. Purposes of Processing and Legal Bases

Purpose	Legal Basis (GDPR)
Provision of the website, hosting	Art. 6 para. 1 lit. f (our legitimate interest in a technically secure, stable, and economical provision of our online service)
User registration, login and account management	Art. 6 para. 1 lit. b (performance of contract)

Purpose	Legal Basis (GDPR)
Execution of analyses and transcriptions using AI	Art. 6 para. 1 lit. b (performance of contract)
Processing of payments	Art. 6 para. 1 lit. b (performance of contract) & Art. 6 para. 1 lit. c (statutory retention obligations)
Statistical evaluation with Umami Analytics (self-hosted)	Art. 6 para. 1 lit. f (legitimate interest in reach measurement without user tracking)
Communication by e-mail	Art. 6 para. 1 lit. b (contract) or lit. f (general inquiries)
Fulfillment of legal obligations (e.g. tax law)	Art. 6 para. 1 lit. c

4. Use of AI-based Processing Systems

To fulfill our contractual services, we process uploaded audio and video files with AI-based models for automatic transcription, analysis, topic and speaker recognition, as well as summarization.

The following applies:

- Processing of content takes place exclusively on servers within the EU.
- There is no transfer to third parties other than those named in this Privacy Policy under section 6.
- **Your data will not be used for training AI models.**

5. Explanation of Our Legitimate Interests

Where we base processing on our legitimate interests (Art. 6 para. 1 lit. f GDPR), these consist in ensuring the security and functionality of our services as well as optimizing our offering. The use of powerful analysis and transcription models is essential to provide the contractually owed service at the best possible quality.

Processing is always carried out with data minimization, purpose limitation, and by applying technical and organizational security measures. After careful consideration, we have concluded that our interests do not outweigh the rights and freedoms of the data subjects.

6. Recipients of Data

We use carefully selected service providers who act on our behalf as processors pursuant to Art. 28 GDPR. Your data will only be shared where necessary for the provision of our service.

- **Hosting:** Hostinger International Ltd., 61 Lordou Vironos Street, 6023 Larnaca, Cyprus (Server location: Frankfurt am Main, Germany)
- **E-mail hosting:** Zoho Corporation B.V., Beneluxlaan 4B, 3527 HT Utrecht, Netherlands
- **Payment processing:** Stripe Payments Europe Ltd., 1 Grand Canal Street Lower, Grand Canal Dock, Dublin, Ireland. Stripe may engage sub-processors who process data also outside the EU. Security is ensured through Standard Contractual Clauses (Art. 46 GDPR). Details of Stripe's sub-processors can be found on their website.
- **AI analysis:** Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (for the "Gemini" model, operating on EU-West instance)
- **AI transcription:** AssemblyAI, Inc., USA (operating on EU instance). As a US company, cooperation is based on their designated EU representative pursuant to Art. 27 GDPR and on Standard Contractual Clauses.
- **Web analytics:** Umami Analytics, self-hosted on our EU servers (no data transfer to third parties).

7. Web Analytics with Umami Analytics

We use "Umami Analytics", a self-hosted, privacy-friendly analytics tool, based on our legitimate interest (Art. 6 para. 1 lit. f GDPR) in anonymized reach measurement.

- No cookies are set for tracking.
- IP addresses are stored in anonymized form.
- No user profiles are created and no data is transmitted to third parties.

8. Storage Period

- **Account data:** until deletion of the user account by you.
- **Project data & uploaded files:** until deletion by you.
- **Retention period after deletion:** up to 30 days (for recovery; during this time data is blocked from productive use).
- **Invoice & payment data:** 10 years (legal retention obligation under § 147 AO, § 257 HGB).
- **Support requests:** 2 years after completion of processing.

After expiry of the periods, the data will be deleted unless other statutory obligations apply.

9. Your Rights as Data Subject

You have the right to:

- Withdraw your consent (Art. 7 para. 3 GDPR)
- Access your data (Art. 15 GDPR)
- Rectification of inaccurate data (Art. 16 GDPR)
- Erasure of your data ("right to be forgotten") (Art. 17 GDPR)
- Restriction of processing (Art. 18 GDPR)
- **Object to processing (Art. 21 GDPR)**
- Data portability in a machine-readable format (Art. 20 GDPR)
- Lodge a complaint with a data protection supervisory authority (Art. 77 GDPR)

The competent supervisory authority for us is the State Commissioner for Data Protection and Freedom of Information of North Rhine-Westphalia.

10. Data Security

We use technical and organizational measures (TOMs) to protect your data, including encrypted data transmission (HTTPS), password hashing, access controls, and secure server locations in the EU.

11. Cookies and Local Storage

Our services do not use tracking cookies. For login and ensuring functionality, technically necessary session cookies or entries in your browser's LocalStorage may be used. These serve exclusively to ensure application functionality and are deleted after the session ends or when closing the browser, or remain only locally on your device.

12. Online Dispute Resolution

The European Commission provides a platform for Online Dispute Resolution (ODR), which you can find here: <http://ec.europa.eu/consumers/odr>. We are neither obliged nor willing to participate in dispute resolution proceedings before a consumer arbitration board.

13. Changes to This Privacy Policy

We reserve the right to amend this Privacy Policy in the event of changes to the service or the legal situation. The current version is always available on our website.

Last Updated: August 10, 2025