

LEGAL · GDPR / RGPD

# Privacy Policy & Data Protection

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How Sabemos AI collects, uses, shares, and protects personal data when you visit our website, engage us as a client, receive our communications, or otherwise interact with us. Written in plain English, structured to meet the EU General Data Protection Regulation and the Spanish LOPDGDD.

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PREPARED BY

**Sabemos AI, S.L.**

Barcelona, Spain · NIF B26933135

DATE

**Effective from 27 May 2026**

# 00 Contents

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<b>01</b>	Who We Are	3
<b>02</b>	Scope of This Policy	4
<b>03</b>	Personal Data We Collect	5
<b>04</b>	How We Use Your Data	6
<b>05</b>	Legal Bases for Processing	7
<b>06</b>	How We Use AI and Automated Tools	8
<b>07</b>	Third Parties and Subprocessors	9
<b>08</b>	International Data Transfers	10
<b>09</b>	Data Retention	11
<b>10</b>	Your Rights	12
<b>11</b>	How to Exercise Your Rights	13
<b>12</b>	Security	14
<b>13</b>	Cookies and Tracking	15
<b>14</b>	Children	16
<b>15</b>	Changes to This Policy	17
<b>16</b>	Contact	18

# 01 Who We Are

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This Privacy Policy is issued by **Sabemos AI, S.L.** ("Sabemos AI", "we", "us", "our"), a company incorporated in Spain with NIF **B26933135** and registered office in **Barcelona, Spain**.

Sabemos AI is a technology and AI solutions agency. For the personal data described in this policy, we act as the **data controller** under Article 4(7) of Regulation (EU) 2016/679 (the **GDPR**) and the Spanish Organic Law 3/2018 on the Protection of Personal Data and Guarantee of Digital Rights (**LOPDGDD**).

We are not required by Article 37 GDPR to appoint a Data Protection Officer. For any data protection matter — including the exercise of your rights — you can contact us directly at **noam@sabemos.ai**.

## 02 Scope of This Policy

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This policy applies to personal data we process as a **controller**, which includes data relating to:

- Visitors to **sabemos.ai** and any subdomain or product page we operate
- Prospective clients we identify through publicly available business information
- Recipients of our outbound emails, LinkedIn messages, and other commercial communications
- Clients, contractors, advisors, and other business counterparties
- Attendees of events we organise or co-host

It does **not** govern personal data we process on behalf of our clients in the course of a delivered engagement — for example, end-user data that flows through a system we build or operate for you. That processing is governed by the **Data Processing Agreement (DPA)** we sign with each client, in which Sabemos AI acts as a **processor** under Article 28 GDPR.

## 03 Personal Data We Collect

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We collect and process the following categories of personal data:

- **Identity and contact data** — name, business email, phone number, job title, employer, country and city.
- **Communications data** — the content of emails, calls, meetings, chat messages, and any documents you choose to share with us.
- **Commercial data** — contracts, proposals, statements of work, invoices, billing addresses, VAT numbers, and bank or payment account details necessary to receive your payments.
- **Prospecting data** — publicly available business information collected from professional networks (e.g. LinkedIn), company websites, and B2B data providers, used to identify and contact qualified business prospects.
- **Website and technical data** — IP address, browser type, operating system, device identifiers, referring URL, pages viewed, and timestamps. See Section 13 on cookies.
- **Event data** — your registration details when you sign up for an event we organise on platforms such as Luma or Eventbrite.
- **Marketing data** — your subscription status, preferences, opens, clicks, and engagement with our communications.

We do **not** intentionally collect special categories of personal data (Article 9 GDPR) such as health, religion, political opinions, or biometric data. Please do not send us such data unless we have specifically agreed in writing that you will do so.

## 04 How We Use Your Data

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We process personal data for the following purposes:

- To respond to enquiries and provide information you have requested.
- To negotiate, sign, and deliver services under our contracts with you.
- To issue invoices, receive payment, and keep accounting and tax records.
- To reach out to qualified business prospects with relevant, B2B commercial communications.
- To send newsletters, event invitations, and other marketing content where you have consented or where permitted as a soft opt-in to existing clients.
- To organise and run our events, including ticketing, attendance, and follow-up.
- To operate, secure, analyse, and improve **sabemos.ai** and our internal tools.
- To comply with legal, tax, accounting, and regulatory obligations applicable to a Spanish company.
- To establish, exercise, or defend legal claims.

## 05 Legal Bases for Processing

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Under Article 6 GDPR, we rely on the following legal bases:

- **Performance of a contract** (Art. 6(1)(b)) — to deliver services to clients and to take pre-contractual steps at your request.
- **Legitimate interests** (Art. 6(1)(f)) — for B2B prospecting and outreach, to secure our systems, to prevent fraud, to manage our business operations, and to analyse and improve our services. We have assessed in each case that our interests are not overridden by your rights and freedoms, and you may object at any time (see Section 10).
- **Consent** (Art. 6(1)(a)) — for non-essential cookies, marketing newsletters where required, and any other processing for which we ask your explicit permission. You may withdraw consent at any time without affecting prior processing.
- **Legal obligation** (Art. 6(1)(c)) — to retain accounting, tax, and commercial records as required by Spanish and EU law.

For B2B outreach we apply the legitimate interest balancing test: contact data is limited to professional information, messages are commercially relevant to the recipient's role, every communication includes a clear opt-out, and we honour opt-outs immediately and permanently.

## 06 How We Use AI and Automated Tools

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As an AI agency, we use third-party large language models and other AI services in the ordinary course of our work — to draft, review, analyse, code, summarise, and translate. The principal providers we use are **Anthropic** (Claude), **OpenAI** (ChatGPT), and **Google** (Gemini).

Where personal data is included in the content we process through these providers, the following applies:

- We use these services under their **API or enterprise agreements**, which contractually prohibit the providers from using our submitted content to train their models.
- We avoid sending special category data, payment credentials, or unnecessary personal data through AI tools.
- We document the AI subprocessors that touch client data in the DPA for each engagement, and we update that list when it changes.
- We follow the principle of **human-in-the-loop**: AI-generated outputs that affect a client deliverable are reviewed by a person before they are shared or acted on.

We do **not** make decisions producing legal effects on you, or similarly significantly affecting you, based **solely** on automated processing within the meaning of Article 22 GDPR. Where automation is used (for example, ranking inbound enquiries), the result is reviewed by a person before any consequential decision is taken.

We monitor and apply, as relevant to our work, the requirements of Regulation (EU) 2024/1689 (the **EU AI Act**), including provisions on transparency, human oversight, and prohibited practices.

## 07 Third Parties and Subprocessors

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We share personal data only with carefully selected service providers who help us run our business. Each provider is bound by a written contract that includes appropriate data protection terms (typically a DPA with Standard Contractual Clauses where applicable).

Our principal categories of recipients are:

- **AI and language model providers** — Anthropic, OpenAI, Google.
- **Cloud, hosting, and infrastructure** — providers of website hosting, content delivery, application hosting, and storage.
- **Workplace and communications** — Google Workspace (email, calendar, drive, meet).
- **CRM, outreach, and prospecting** — tools used to manage outbound communications and pipeline, including LinkedIn Sales Navigator and email outreach platforms.
- **Payments and banking** — payment processors and our business banking provider, who receive only the data necessary to settle invoices.
- **Accounting and tax** — our external gestoría and accounting software, who receive billing and tax data as required by law.
- **Analytics and advertising** — Google Analytics, Meta (Facebook/Instagram) for advertising performance.
- **Event platforms** — Luma, Eventbrite, and similar.
- **Professional advisers** — lawyers, auditors, and consultants under a duty of confidentiality, where strictly necessary.
- **Public authorities** — only where we are required by law to do so.

We do **not** sell personal data. We do not share personal data for the independent marketing purposes of any third party.

On request to [noam@sabemos.ai](mailto:noam@sabemos.ai), we will provide an up-to-date list of the specific subprocessors used for your engagement.

## 08 International Data Transfers

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Some of our service providers — including the AI providers listed above — are established outside the European Economic Area, principally in the **United States**. When personal data is transferred outside the EEA, we ensure that one of the following safeguards under Chapter V GDPR is in place:

- An **adequacy decision** of the European Commission (for example, the EU–US Data Privacy Framework for certified US recipients).
- **Standard Contractual Clauses** approved by the Commission (Decision (EU) 2021/914), supplemented by technical and organisational measures where required after a transfer impact assessment.
- Another lawful transfer mechanism set out in Articles 46–49 GDPR.

You can request a copy of the safeguards in place for a specific transfer by writing to [noam@sabemos.ai](mailto:noam@sabemos.ai).

## 09 Data Retention

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We retain personal data only for as long as necessary for the purpose for which it was collected, and in any case according to the following schedule:

DATA CATEGORY	RETENTION PERIOD
Enquiries and prospect contacts	Until you object or 24 months of inactivity — whichever is sooner.
Client and engagement records	Duration of the contract plus 6 years (Spanish Commercial Code).
Invoices and tax-relevant records	6 years (Commercial Code) and 4 years (General Tax Law) from issue.
Communications data	Duration of the relationship plus 3 years for limitation purposes.
Marketing consent records	As long as consent is active plus 1 year of evidence after withdrawal.
Website analytics	Up to 14 months in aggregated form.
Server and security logs	Up to 12 months.

When a retention period expires, data is either securely deleted or anonymised.

# 10 Your Rights

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Under the GDPR and the LOPDGDD, you have the following rights in relation to your personal data:

- **Access** (Art. 15) — to obtain confirmation of whether we process your data and a copy of it.
- **Rectification** (Art. 16) — to have inaccurate or incomplete data corrected.
- **Erasure** (Art. 17) — to have your data deleted, subject to legal exceptions.
- **Restriction** (Art. 18) — to limit how we process your data in certain circumstances.
- **Portability** (Art. 20) — to receive your data in a structured, machine-readable format, or have it transmitted to another controller.
- **Objection** (Art. 21) — to object to processing based on legitimate interests, including direct marketing, which we will always honour.
- **Not be subject to solely automated decisions** with legal or similarly significant effects (Art. 22).
- **Withdraw consent** at any time, without affecting the lawfulness of processing carried out before withdrawal.
- **Lodge a complaint** with a supervisory authority (see Section 11).

# 11 How to Exercise Your Rights

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To exercise any of the rights above, write to [noam@sabemos.ai](mailto:noam@sabemos.ai) with the subject line “**Privacy Rights Request**”. Tell us which right you wish to exercise and include enough information for us to identify you. We may ask for additional information to verify your identity where there is reasonable doubt.

We will respond within **one month** of receipt. Where a request is complex or numerous, we may extend that period by up to two further months and will tell you within the first month if we do so. Our response is free of charge except where requests are manifestly unfounded or excessive.

If you believe we have not handled your data correctly, you have the right to lodge a complaint with the Spanish supervisory authority, the **Agencia Española de Protección de Datos (AEPD)**:

- Web: [www.aepd.es](http://www.aepd.es)
- Address: C/ Jorge Juan, 6 · 28001 Madrid · Spain

If you reside in another EEA Member State, you may also complain to your local supervisory authority.

## 12 Security

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We apply appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, disclosure, loss, and destruction, as required by Article 32 GDPR.

These include:

- Encryption in transit (TLS) and, where applicable, at rest.
- Multi-factor authentication on critical accounts and administrative interfaces.
- Role-based access control and the principle of least privilege.
- Regular review of our subprocessors and their security posture.
- Secure deletion and disposal procedures.
- Documented incident response procedures.

In the event of a personal data breach likely to result in a risk to your rights and freedoms, we will notify the AEPD within **72 hours** of becoming aware of it, and will notify affected individuals without undue delay where the breach is likely to result in a **high** risk to their rights and freedoms.

No system is perfectly secure. We do not promise absolute security, but we commit to acting with the diligence and transparency the GDPR requires.

# 13 Cookies and Tracking

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sabemos.ai uses cookies and similar technologies. We distinguish between:

- **Strictly necessary cookies** — required to operate the site (e.g. session, security, load balancing). These do not require consent.
- **Analytics cookies** — to understand how visitors use the site (e.g. Google Analytics). Loaded only with your consent.
- **Advertising and marketing cookies** — to measure the performance of our campaigns and serve relevant ads (e.g. Meta Pixel). Loaded only with your consent.

You can accept, reject, or customise non-essential cookies through the **cookie banner** shown on your first visit and at any time afterwards via the cookie preferences link in the site footer.

A full list of cookies in use — including their name, purpose, provider, and duration — is available in our separate **Cookie Policy** at [sabemos.ai/cookies](https://sabemos.ai/cookies).

## 14 Children

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Our services and communications are directed at businesses and adults aged 18 or over. We do not knowingly collect personal data from minors. If you believe a minor has provided us with personal data, please contact [noam@sabemos.ai](mailto:noam@sabemos.ai) and we will delete it promptly unless we have a legal obligation to retain it.

# 15 Changes to This Policy

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We may update this Privacy Policy from time to time to reflect changes in our practices, our services, applicable law, or guidance from supervisory authorities. The **Effective from** date on the cover page reflects the latest version.

Material changes will be communicated to active clients by email at least 15 days before they take effect, where reasonably practicable. The current version is always available at [sabemos.ai/privacy](https://sabemos.ai/privacy).

## 16 Contact

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For any question about this Privacy Policy or how we process your personal data:

- **Email** — noam@sabemos.ai
- **Post** — Sabemos AI, S.L. · Barcelona, Spain
- **Phone** — +34 600 29 15 73

We aim to acknowledge every privacy enquiry within five working days.

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### **Sabemos AI, S.L.**

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sabemos.ai · noam@sabemos.ai · +34 600 29 15 73