

# Privacy Information

We take the protection of personal data very seriously. The collection and processing of personal data is carried out in accordance with applicable data protection regulations, particularly the General Data Protection Regulation (GDPR).

## Protection of Personal Data

All personal data processed in connection with the use of Sally is stored and hosted exclusively on servers located in Germany. These servers meet the highest security standards and are regularly maintained and audited.

Data is processed solely for the purposes contractually agreed upon and in accordance with applicable data protection laws, in particular the GDPR. Any use or disclosure of personal data beyond this scope is strictly excluded.

## Participation and Recording by Sally

Sally only participates in meetings and records or transcribes content **with the prior explicit consent** of the participants involved.

Participation is activated by the meeting owner. Once active, a notification is shown to all participants – including those joining later – informing them about Sally's presence and data protection details, including the option to remove Sally and erase all data collected during the current meeting.

## Measures to Protect Personal Data

We have implemented comprehensive technical and organizational measures to protect your personal data from unauthorized access, loss, or destruction. These measures include:

- **Encryption:** Ensuring data is encrypted both in transit and at rest.
- **Access Controls:** Granting access only to authorized individuals.
- **Security Reviews:** Performing regular security assessments and updates.

## Use of Third-Party Providers

For certain functionalities, **Aliru GmbH** may engage specialized third-party service providers (e.g., for hosting, transcription, or technical services). These providers are contractually bound under Art. 28 GDPR to process data **exclusively within the scope of their service and in accordance with Aliru's instructions**.

Compliance with all data protection requirements is regularly monitored. The use of data by third parties for their own purposes is excluded.

## Processing of AI-Generated Results

Transcripts, conversation summaries, or other analytical results generated by Sally during meetings are processed **solely on behalf of and in the interest of the respective customer**.

These data are **not** used for training, improving, or developing AI models by Aliru GmbH or any third parties. No storage or disclosure of such content occurs for analysis or optimization purposes outside the specifically commissioned usage context.

Processing is strictly instruction-based, in accordance with Art. 28 GDPR. Any use of transcripts or analytical outputs for model training or machine learning purposes is explicitly excluded.

## How to Safely Remove Sally from a Meeting

If Sally has been enabled by default but should not participate in a meeting, you may **remove Sally at any time by typing "opt out"**. This will immediately and irreversibly delete all data collected up to that point.

**Important:** If Sally is removed by other means, the data recorded up to that point will remain and may be processed into a transcript. To ensure that no data is retained, always use the "opt out" command.

# Additional Data Protection Information

## Data Subject Rights (Art. 15–21 GDPR)

- Users have the following rights regarding the processing of their personal data:
- Right of access (Art. 15 GDPR)
- Right to erasure ("right to be forgotten") (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- Right to object (Art. 21 GDPR)
- Right to withdraw consent at any time (without affecting the lawfulness of processing before withdrawal)

## Legal Basis for Data Processing

- Consent pursuant to Art. 6 (1) lit. a GDPR (e.g., for meeting recordings or transcriptions)
- Performance of a contract pursuant to Art. 6 (1) lit. b GDPR (e.g., for the provision of services to customers)
- Legitimate interests pursuant to Art. 6 (1) lit. f GDPR (e.g., for system improvement using anonymized usage data)

## List of External Service Providers (Subprocessors)

- Microsoft Azure – Hosting (Germany only)
- Microsoft Dynamics 365 – CRM & Support (Germany only)
- Microsoft Clarity – User behavior analytics
- Amazon Web Services (AWS) – Hosting (Germany only)
- DeepL – Translation services
- Google Analytics – Web analytics
- Stripe – Payment processing
- Strato – Hosting (Germany only)



## Important Documents



### Data Processing Agreement (DPA):

[Data Processing Agreement](#)



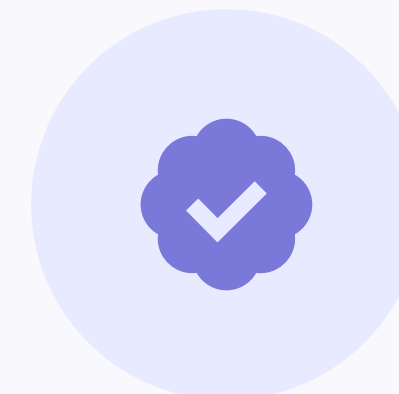
### Technical and Organizational Measures (Annex, page 15):

[Data Processing Agreement](#)



### Platform Privacy Policy:

[Platform Privacy Policy](#)



### General Terms and Conditions (GTC):

[General Terms and Conditions](#)



SALLY

#### Provider

Sally is a software product of Aliru GmbH



Managing Director: Julian Kissel  
Julius-Hatry-Straße 1  
68163 Mannheim, Germany

Commercial Register: District Court of Mannheim (Amtsgericht Mannheim)  
Registration Number (HRB): 739079  
VAT Identification Number (VAT ID): DE815598075



#### Contact

Email: [contact@sally.io](mailto:contact@sally.io)  
Website: [www.sally.io](http://www.sally.io)



#### Responsible in accordance with §10 (3) MDStV (German Interstate Media Services Agreement)

Julian Kissel  
Julius-Hatry-Straße 1  
68163 Mannheim

For more information about our data protection policies, please visit our website:  
<https://www.sally.io/saas-privacy-policy>

## Your point of contact



**Julian Kissel**  
CEO



**Norton Engele**  
Data Protection Officer