Privacy Notice for Meeting Participants

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.

AI processing exclusively in Germany
Analysis, transcription and summarisation of conversation content run on a language model operated by Sally itself, hosted on our own infrastructure in Germany. No external AI providers are used.

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 with AES-256 at rest and TLS 1.3 in transit
- Role-based access controls and strict multi-tenancy separation
- Annual external penetration tests by independent auditors
- Certified per ISO/IEC 27001:2022 (DICIS, Reg. no. 260526 14 IMS, valid until 2028-05-26)

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.

After the contractual relationship ends, data processed on behalf is deleted within 30 days at the latest, or returned on request. Individual deletion requests are implemented within 5 business days.

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.

For recordings of in-person conversations via the Sally app and for uploaded audio or video files, the chat-based "opt out" is technically not available. In these cases, informing the participants and establishing the legal basis are the responsibility of the company deploying Sally.

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 rectification (Art. 16 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)

Note: To exercise your rights, contact our Data Protection Officer Norton Engele: privacy@sally.io

Legal Basis for Data Processing

- Processing on behalf of the controller under Art. 28 GDPR: Sally processes meeting content exclusively as processor on behalf of the deploying company. The legal basis under Art. 6 (and, where applicable, Art. 9 (2)) GDPR is determined by the company as controller.
- Consent pursuant to Art. 6 (1) lit. a GDPR, where selected and obtained by the controller as the legal basis.
- 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 (IT security, error analysis, operational stability, no use for AI training)

List of External Service Providers (Subprocessors)

For meeting data (processed in German data centers):

- Hetzner Online GmbH, Germany, cloud infrastructure / hosting / backups
- DeepL SE, Germany, AI-powered translation
- Strato AG, Germany, web hosting and infrastructure

For our contractual relationship (processed in the EU, no access to meeting data):

- Stripe Payments Europe, Ireland, payment processing
- Microsoft Dynamics 365, EU data centers, internal CRM

Important Documents

Data Processing Agreement (DPA):

View the DPA

Technical and Organisational Measures (Annex 1 of the DPA):

Download the TOMs (PDF)

Platform Privacy Policy:

Read the Privacy Policy

General Terms and Conditions (GTC):

View the GTC

SALLY

Provider

Sally AI is a software solution provided by 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: privacy@sally.io
Website: www.sally.io

Responsible in accordance with §18 (2) MStV (German Interstate Media Treaty)

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