



Privacy Policy

Umbraic B.V.

Last updated: 5 November 2025

Data Controller: Umbraic B.V.

Registered Address: Prof. Tulpstraat 13, 1018GZ Amsterdam, The Netherlands

KVK: 98648640

Contact: jochem@umbraic.com

1. Introduction

Umbraic B.V. (“Umbraic”, “we”, “our”, or “us”) provides an AI-native compliance platform that helps organisations automate compliance documentation and align outputs with regulator requirements.

This Privacy Policy explains how we collect, use, share, and protect personal data when you interact with our website, use our software and related services (“Services”), or otherwise engage with us.

We are committed to protecting your privacy and processing personal data in compliance with the **General Data Protection Regulation (EU) 2016/679 (GDPR)** and other applicable laws.

2. How We Collect and Use Personal Data

We collect and process data in the following ways:

a. Client and User Information

When a business (our Client) uses the Umbraic platform, we may process personal data of the Client’s authorised users, such as:

- Name, email address, and contact details
- Role and organisation
- Login credentials and platform activity

We use this data to provide and secure the Services, authenticate access, deliver support, and communicate with Clients.

b. Compliance Documentation and Internal Policies

Clients may upload their own **internal compliance documentation**, such as policies, procedures, manuals, and other materials used to manage regulatory obligations.

- These documents remain the sole property of the Client.
- Clients have full control and can **upload, manage, and delete** these materials at any time.
- When deleted, documents are **permanently removed** from Umbraic’s active systems and backups within the retention window required for system integrity.



- Umbraic does not **access, share, or disclose** Clients' internal documentation to third parties except **trusted service providers** who support our services and are bound by strict confidentiality and data-protection obligations.
- These materials are **never used to train or fine-tune AI models**.

Umbraic only processes these documents as a **Processor**, under the Client's direction and in accordance with a **Data Processing Agreement (DPA)**.

c. Website Visitors and Communication

When you visit our website or contact us, we may collect information such as:

- Contact details submitted via forms or email
- Log data and cookies (see Section 4)

3. Legal Basis for Processing

We process personal data based on one or more of the following legal grounds:

- **Contractual necessity:** to provide our Services and fulfil our obligations under the Agreement with the Client.
- **Legitimate interests:** to ensure platform security, improve functionality, and communicate with Clients.
- **Legal obligations:** to comply with applicable laws or regulatory requirements.
- **Consent:** for optional communications such as newsletters or event invitations (you can withdraw consent at any time).

4. Cookies

Umbraic uses cookies and similar technologies to ensure proper website functionality and analyse traffic.

- **Necessary cookies:** enable core functionality such as login and session security.

5. How We Share Data

We only share personal data where necessary and in accordance with GDPR:

- **Service Providers:** Trusted third-party vendors that support hosting, analytics, and large-language-models all bound by strict confidentiality and data protection terms.
- **Affiliates:** Within the Umbraic group, for internal administration and service delivery.
- **Legal or Regulatory:** Where required to comply with law or respond to lawful requests.
- **Business Transactions:** In case of a merger or acquisition, provided appropriate safeguards are in place.

Umbraic does **not** sell, rent, or use Clients' uploaded documentation or data for any purpose beyond delivering the contracted Services.



6. Data Security and Retention

Umbraic maintains industry-standard **technical and organisational measures** to protect data, including:

- Encryption in transit and at rest
- Access controls and activity logging
- Secure hosting within the **European Economic Area (EEA)**

We retain personal data only as long as necessary to provide the Services or meet legal obligations.

Client-uploaded compliance documents can be deleted by the Client at any time. Once deleted, Umbraic ensures they are not recoverable from active storage. Only aggregated, anonymised usage data may be retained for analytics.

7. International Data Transfers

If data is transferred outside the EEA, Umbraic ensures an adequate level of protection through **EU Standard Contractual Clauses (SCCs)** or equivalent safeguards.

8. Your Rights

Under GDPR, individuals have the following rights:

- **Access** – Obtain a copy of your personal data.
- **Rectification** – Correct inaccurate or incomplete data.
- **Erasure** – Request deletion of your personal data (subject to legal requirements).
- **Restriction** – Limit processing under certain conditions.
- **Portability** – Receive your data in a portable format.
- **Objection** – Object to processing based on legitimate interests.
- **Withdraw consent** – Withdraw consent where processing is based on it.

To exercise your rights, email jochem@umbraic.com. We may verify your identity before fulfilling requests.

9. Children's Privacy

Our Services are intended for business use only and are **not directed at minors**. We do not knowingly collect data from individuals under 18.

10. Updates to This Policy

We may update this Privacy Policy periodically. The latest version will always be available on our website. Continued use of our Services constitutes acceptance of any updates.

11. Contact

For questions, concerns, or to exercise your rights:



Data Protection Officer

Umbraic B.V.

Prof. Tulpstraat 13

1018GZ Amsterdam, The Netherlands

Email: jochem@umbraic.com

If you are unsatisfied with our response, you may contact the **Dutch Data Protection Authority (Autoriteit Persoonsgegevens)**.