



# Privacy Policy

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## First Information Layer

Data controller	Generative Audit AI, S.L. Mare Nostrum 15, 08039 Barcelona (España) Email: <a href="mailto:support@audit-ai.ai">support@audit-ai.ai</a>
Purposes of Processing	To manage, contract, and provide the services offered through the AuditAI platform (including the creation and administration of user accounts) and our corporate website. With your consent, to send commercial information about the products and services of Generative Audit AI, S.L.
Categories of Data Processed and Sources	We may process your professional identification data provided by your employer for the purpose of creating and managing your access credentials to the services.
Legal Basis for Processing	Performance of a contract (management and provision of the services). Consent of the data subject (for commercial communications).
Recipients	Technology service providers, public authorities, and purchasers in corporate restructuring processes.
International Transfers	Some providers (for example, cloud hosting services) may process your personal data outside the European Economic Area (EEA).  These transfers are carried out with the appropriate safeguards established under Article 46 of the GDPR, including the

	Standard Contractual Clauses approved by the European Commission.
Rights	You may exercise your rights of access, rectification, erasure, objection, restriction, portability, and not to be subject to automated decisions, as well as withdraw your consent, by writing to <a href="mailto:support@audit-ai.ai">support@audit-ai.ai</a>
Additional Information	We invite you to read our full Privacy Policy below to understand in detail how we will use your personal data and the rights you have in relation to it.

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## Second Information Layer

### 1. Who is the controller of your Personal Data?

### 2. What type of Personal Data do we collect and from what sources?

### 3. For what purposes do we process your Personal Data and on what legal bases?

### 4. With whom do we share your Personal Data?

### 5. How long do we retain your Personal Data?

### 6. Are international transfers of Personal Data carried out?

### 7. What rights do you have over your Personal Data?

### 8. Changes to this Privacy Policy.

This Privacy Policy describes how AuditAI (as defined in Section 1 below) collects and processes your Personal Data, as well as the rights you have in relation to such processing. For the purposes of this document, "Personal Data" means any information that identifies or makes an individual identifiable.

This Privacy Policy applies to the processing of Personal Data that we collect both (i) in the context of managing and providing our services consisting of offering and maintaining a software solution based on artificial intelligence (hereinafter, the "Solution"), which operates as an assistant in certification audits of ISO management systems and is available on a platform managed by AuditAI (hereinafter, the "Services"); and (ii) through our corporate website (<https://audit-ai.com>), including browsing, the management of contact forms, requests for information, and the use of cookies or other similar technologies.

## 1. Who Is The Controller Of Your Personal Data?

The controller of your Personal Data is Generative Audit AI, S.L., with registered office in Barcelona, Passeig del Mare Nostrum, number 15, and holder of Tax ID number (NIF) B-75.681.080 ("AuditAI"). You may contact us at the following email address: [support@audit-ai.ai](mailto:support@audit-ai.ai)

## 2. What Type Of Personal Data Do We Collect And From What Sources??

We collect your Personal Data directly from you when you provide the information during the provision of the Services, as well as through the contact, information request, complaint and/or incident forms available on the Solution or on our corporate website.

In some cases, your Personal Data may also be provided by your employer for the purpose of creating and managing your access credentials to the Solution, within the framework of the contractual relationship between your company and AuditAI, as the provider of the Services.

### A. Categories of Personal Data provided directly by you include:

- (a) Identification data: first name(s) and surname(s);
- (b) Contact data: address, city/town, postal code, autonomous community, telephone number, email address, and province;
- (c) Payment data for the Services (in the event that you act as a self-employed professional and contract the Services on your own behalf): debit or credit card number; bank account number (in the case of deferred invoicing); and Tax Identification Number (N.I.F.) (for invoice issuance), signature;
- (d) Access data for the Solution: professional email, password, identification required to access the Services, and IP address;
- (e) Survey-related data: responses to quality or customer satisfaction surveys, incidents, internet-related problems; and
- (f) Data obtained from your use of the Services and the corporate website:
  - (i) Browsing data (such as IP address, online identifiers, device type, operating system, pages visited); and

- (ii) Information collected automatically through cookies or similar tracking technologies, such as unique identifiers, data about browsing habits, frequency and duration of visits, traffic origin, among others. You can find more information in our [Cookies Policy](#).

B. Categories of Personal Data provided by your employer include:

- (a) Access data for the Solution: professional email, password, identification required to access the Services, and IP address.

### 3. For What Purposes Do We Process Your Personal Data And On What Legal Bases Do We Rely?

We process the Personal Data we collect about you for the purposes and on the legal bases set out below:

- (a) Performance of the contractual relationship: We process your Personal Data in order to fulfil the contractual relationship we maintain with you by virtue of your acceptance of the *"Terms of Use of the AuditAI Platform"* (and, if you act as a self-employed professional and contract the Services on your own behalf, the *license agreement for the Solution*). In this regard, we process your Personal Data for the following purposes:
  - (i) The contracting, provision, and management of the Services, including the generation of credentials, the creation and administration of user accounts, the management and monitoring of access to the Services, the administration of the Solution, the sending of communications about new functionalities of the Solution, and the handling of your suggestions, queries, or complaints; and
  - (ii) If you act as a self-employed professional, the management of payment for the Services, including the sending of payment confirmation notices, information, and instructions for access via SMS, MMS, instant messaging services (for example, WhatsApp), or other equivalent electronic means, as well as the delivery of invoices in electronic format via email.
- (b) Compliance with legal obligations: We process your Personal Data in order to comply with the legal obligations applicable to AuditAI, for the following purposes:
  - (i) To cooperate with regulatory authorities and law enforcement bodies, including the communication of your Personal Data in response to legitimate requests issued by such authorities in the exercise of their duties; and

- (ii) To comply with any other legal obligations that may, in each case, be applicable to AuditAI.
- (c) Legitimate interest: We process your Personal Data on the basis of our legitimate interest for the following purposes:
  - (i) To improve and optimise the provision of the Services, based on our legitimate interest in ensuring that the Services we provide remain up to date, efficient, and competitive, and in adapting to the needs of our users;
  - (ii) To protect the security and/or integrity of our Solution and IT infrastructure (including the performance of backups, access control, and encryption), based on our legitimate interest in protecting our systems, data, and users against fraud, security threats, or unauthorised access;
  - (iii) To send surveys by email for quality control purposes, based on our legitimate interest in obtaining user feedback to improve the quality of the Services and the user experience;
  - (iv) To analyse how you use our Services, in order to identify areas for improvement and to continue developing the functionalities, performance, and support available in our Solution, after anonymising usage data, based on our legitimate interest in developing improvements and innovations that meet the real needs of our users;
  - (v) To monitor the training activities that may be offered to you in relation to the Services and to address your enquiries and requests in this regard, based on our legitimate interest in improving the user experience and providing better support and ongoing training; and
  - (vi) To process browsing and usage data from the website and the Solution through technical or audience measurement cookies or other tracking technologies that do not require user consent under applicable regulations, in order to analyse the technical operation and usability of the Solution and the corporate website, as well as to ensure their security and operational continuity, based on our legitimate interest in offering a functional and secure digital environment for users.  
In the event that we use cookies (or other tracking technologies) that do require your consent, we will request it in advance.

In those cases where the processing of your Personal Data is based on our legitimate interest, a legitimate interest assessment has been conducted confirming a prevailing interest on our part that allows us to rely on this legal

basis. You may access the conclusions of this assessment by contacting us at the address indicated in Section 1 (*"Who is the controller of your Personal Data?"*).

- (d) Consent: We will process your Personal Data for the following purposes, provided that you have given your prior consent:
  - (i) To manage your participation in draws and promotions in which you enrol;
  - (ii) To send you information about other products or services offered by AuditAI, whether or not similar to the Services;
  - (iii) To collect and process browsing and preference information through cookies or other similar technologies, in order to analyse traffic, personalise the user experience, and offer content or recommendations aligned with your interests, in accordance with our Cookies Policy; and
  - (iv) Any other purpose that requires your prior consent.

If we request your consent to process your Personal Data, you may revoke it at any time by contacting us at the email address indicated in Section 1 (*"Who is the controller of your Personal Data?"*).

#### 4. With Whom Do We Share Your Personal Data?

AuditAI will share your Personal Data with third parties in the following circumstances:

1. **Service Providers:** We will allow our service providers to access your Personal Data in order to provide us with services such as, among others, customer support (for example, through call centers, SMS messages, or emails), administration (for example, invoice management), banking services (such as payment gateways for collecting fees for the Services via debit or credit cards), IT services (for example, database or software management), auditing and accreditation-related services, as well as tax, insurance, or legal services.

In most cases, these service providers will act as data processors, processing your Personal Data in accordance with our instructions and under the data processing agreement we have executed with them. However, in some cases where they act as independent data controllers (for example, banking institutions or auditors), the processing will be based on the performance of the contract we have with you or on our legitimate interest, as applicable. You may request further information by contacting us through the channel indicated in Section 1 (*"Who is the controller of your Personal Data?"*).

Among others, your Personal Data will be communicated to the service provider Orange, in connection with AWS cloud information storage services, whose privacy policy sets out the conditions applicable to the processing of your Personal Data and can be found at the following link:

<https://aws.amazon.com/es/compliance/data-privacy/>.

2. **Public Authorities:** We may share your Personal Data with law enforcement agencies, judges and courts, regulatory authorities, government entities, or other competent third parties when necessary to comply with a legal obligation or based on our legitimate interest in protecting our rights or the rights of third parties.
3. **Purchasers in Corporate Restructuring Processes:** We may share your Personal Data with third parties that acquire, or to whom we transfer, all or a substantial part of our assets or business, as well as with those with whom we engage in merger, consolidation, integration, or similar restructuring processes. This processing is based on our legitimate interest in properly managing corporate operations necessary for the continuity and stability of the company.

Since we operate as part of a global business, some of the recipients mentioned above may be located outside your jurisdiction or outside the territory where the Services are provided, including countries outside the European Economic Area (EEA) that do not guarantee a level of protection for Personal Data equivalent to that required by European regulations. For more information, please refer to Section 6 (*"Are international transfers of data carried out?"*).

## 5. How Long Do We Retain Your Personal Data?

We will retain your Personal Data for as long as we maintain a contractual relationship with you. Once such relationship has ended, the data will be retained for the period necessary to comply with applicable legal obligations or for as long as claims or complaints may reasonably justify their retention.

In the case of processing related to your participation in raffles, promotions, or other similar activities, Personal Data will be retained from the time of registration until one (1) year after the conclusion of the relevant activity.

After the aforementioned periods, your Personal Data will be kept blocked for the legally prescribed periods in order to address any potential liabilities. Once those periods have expired, the data will be permanently deleted.

## 6. Are International Transfers Of Personal Data Carried Out?

Some of the data processors with whom we collaborate may access your Personal Data from organisations and/or countries located outside the European Economic Area (EEA). In certain cases, these countries do not have an adequacy decision issued by the European Commission and therefore do not guarantee a level of protection equivalent to that required under European regulations.

In such situations, AuditAI will adopt the appropriate safeguards provided for in Article 46 of the GDPR, such as the execution of [Standard Contractual Clauses](#) approved by the European Commission or other recognised protective mechanisms, in order to strengthen the protection of your Personal Data and ensure processing in accordance with applicable legislation.

You may obtain additional information about the main international data transfers we carry out in the course of our activity by contacting us at the following address: [support@audit-ai.ai](mailto:support@audit-ai.ai), as well as the address indicated in Section 1 (*"Who is the controller of your Personal Data?"*).

## 7. What Rights Do You Have Regarding Your Personal Data?

We inform you that you have the following rights regarding your Personal Data:

- **Right of access:** The right to obtain confirmation as to whether or not we are processing your Personal Data and, where appropriate, to request access to such data and to certain information regarding their processing (purposes, categories of data processed, recipients, among other details).
- **Right to rectification:** The right to request the rectification of inaccurate Personal Data and/or the completion of incomplete Personal Data.
- **Right to erasure:** The right to request the deletion of your Personal Data when, among other reasons, your Personal Data are no longer necessary in relation to the purposes for which they were collected.
- **Right to restriction of processing:** The right to obtain the restriction of the processing of your Personal Data in certain circumstances; for example, when you contest the accuracy of your Personal Data, in accordance with applicable law.
- **Right to data portability:** The right to receive the Personal Data you have previously provided to us in a structured, commonly used, and machine-readable format. You may also request that we transmit your Personal Data directly to a third party of your choice (where technically feasible).
- **Right to object:** You may object at any time to the processing of your Personal Data on grounds relating to your particular situation. In such a case, we will cease processing your Personal Data unless they must continue to be processed for compelling legitimate reasons or for the establishment, exercise, and/or defence of our legal rights, as applicable.
- **Right to withdraw consent:** When we process your Personal Data based on your consent, you may withdraw such consent at any time.
- **Right not to be subject to automated decision-making:** The right not to be subject to a decision based solely on the automated processing of your Personal Data, including profiling, which produces legal effects concerning you or similarly significantly affects you. Please note that we do not carry out such activities.

You may exercise your rights by writing to the following email address: [support@audit-ai.ai](mailto:support@audit-ai.ai). Finally, Finally, you may also lodge a complaint before competent data protection supervisory authority, in the Member State of your habitual residence, place of work or place of the alleged infringement (see the list of the European supervisory authorities here: [https://www.edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en)).



## 8. Changes To This Privacy Policy.

This Privacy Policy may be modified when necessary, depending on regulatory changes or the evolution of our Personal Data processing practices.

In the event that we introduce changes that have a substantial impact on the processing of your Personal Data, we will notify you in advance. Such notification will be made so that you may exercise your rights, for example, to object to certain processing activities or to give your consent if it is required for new purposes.

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