# **EN Version**

# **Privacy Policy - SimplyBox**

Last Updated: September 17, 2025

Effective Date: September 17, 2025 - TBA

### 1. Introduction

SimplyBox ("we," "our," or "us") operates an AI-powered communication management platform that helps small and medium enterprises (SMEs) streamline their customer communications through unified inbox management, automated responses, and intelligent message processing.

This Privacy Policy explains how we collect, use, process, and protect your personal information when you use our service, including our website, dashboard, mobile applications, and related services (collectively, the "Service").

# 2. Information We Collect

#### 2.1 Account Information

- Contact Details: Name, email address, phone number, business name
- Authentication Data: Login credentials, OAuth tokens for third-party integrations
- Business Information: Company name, business type, expected message volume, team size
- **Billing Information**: Payment methods, billing addresses, transaction history (processed securely through third-party payment processors)

# 2.2 Communication Data

- Email Messages: Content, sender/recipient information, timestamps, attachments
- WhatsApp Messages: Message content, phone numbers, message status, delivery confirmations
- Message Metadata: Conversation threads, response times, message classifications
- **File Attachments**: Documents, images, and other files shared through integrated communication channels

# 2.3 Usage and Analytics Data

- Platform Usage: Dashboard interactions, feature usage patterns, session duration
- Performance Data: Response times, error logs, system performance metrics
- **Device Information**: IP addresses, browser types, operating systems, device identifiers
- **Communication Patterns**: Message volume, peak usage times, conversation analytics

# 2.4 AI Processing Data

- Knowledge Base Content: Business documents, FAQs, product information uploaded by users
- **AI Training Data**: Conversation patterns, response effectiveness metrics
- **Processing Logs**: AI model interactions, response generation metadata

#### 3. How We Use Your Information

### 3.1 Service Provision

- Unified Communication Management: Aggregate and display messages from multiple channels
- AI-Powered Responses: Generate contextual, personalized responses using our RAG (Retrieval-Augmented Generation) pipeline
- **Team Collaboration**: Enable multiple team members to manage communications
- **Knowledge Management**: Store and retrieve business-specific information for accurate responses

### 3.2 Service Improvement

- **Platform Optimization**: Analyze usage patterns to improve user experience
- AI Model Enhancement: Use aggregated, anonymized data to improve response accuracy
- **Feature Development**: Develop new features based on user needs and feedback
- Performance Monitoring: Ensure system reliability and optimal performance

# 3.3 Communication and Support

- **Customer Support**: Provide technical assistance and resolve issues
- Service Updates: Notify users about new features, changes, or maintenance
- Account Management: Send billing notifications, renewal reminders, and account status updates

# 3.4 Legal and Security

- **Compliance**: Meet legal obligations under Indonesian data protection laws (UU PDP)
- Security: Detect and prevent fraudulent activities, security threats, and abuse
- Business Operations: Conduct internal analytics, financial reporting, and business planning

# 4. Data Processing and AI Integration

# **4.1 AI Processing Framework**

We use advanced AI models, including Llama-based language models, to provide intelligent response suggestions and business insights:

- **Contextual Processing**: Your messages are processed in real-time to generate relevant responses
- Knowledge Integration: Business documents and FAQs are vectorized and stored for contextual retrieval
- Privacy-Preserving AI: AI processing occurs with encrypted data, and personal information is masked where possible

# 4.2 RAG Pipeline

Our Retrieval-Augmented Generation system:

- Stores your business-specific knowledge in encrypted vector databases (Pinecone)
- Retrieves relevant information based on customer inquiries
- **Generates** contextually appropriate responses using AI models
- Learns from interaction patterns to improve response quality over time

### 4.3 Data Encryption

- At Rest: All stored data is encrypted using AES-256 encryption
- In Transit: Data transmission is secured using TLS 1.3 encryption
- Processing: Temporary decryption occurs only in secure RAM during AI processing
- Access Control: Role-based access ensures only authorized team members can view sensitive data

# 5. Data Sharing and Third-Party Services

### 5.1 Service Providers

We work with trusted third-party services to provide our platform:

- Google Cloud Platform: Gmail API integration, Cloud Pub/Sub for real-time notifications
- **Meta Platforms**: WhatsApp Business API for messaging services
- **Twilio**: Backup WhatsApp messaging and SMS services
- **Supabase**: Database hosting and backend services
- **Pinecone**: Vector database for AI knowledge storage
- **Groq**: AI model inference services
- **Vercel**: Application hosting and deployment

# **5.2 Data Processing Agreements**

All third-party processors are bound by data processing agreements that ensure:

- Data is processed only for specified purposes
- Appropriate security measures are implemented
- Data is not used for their own purposes without consent
- Compliance with applicable data protection laws

### 5.3 Business Transfers

In case of merger, acquisition, or business sale, your information may be transferred to new owners with the same privacy protections.

# 5.4 Legal Requirements

We may disclose information when required by law, court order, or to protect our rights and safety.

# 6. Data Retention and Storage

#### 6.1 Retention Periods

- Account Data: Retained while your account is active and for 12 months after deletion
- Communication Data: Stored for 24 months or as required by your business needs

- AI Training Data: Anonymized patterns may be retained indefinitely for service improvement
- **Billing Records**: Kept for 7 years as required by Indonesian tax regulations

#### 6.2 Data Location

- **Primary Storage**: Indonesia and Singapore (AWS Asia Pacific regions)
- **Backup Storage**: Encrypted backups in multiple geographic locations
- AI Processing: May occur in US or EU regions with appropriate safeguards

### 6.3 Data Deletion

Users can request data deletion at any time. Upon deletion:

- Personal data is permanently removed within 30 days
- Anonymized analytics data may be retained for service improvement
- Legal or regulatory retention requirements are honored

# 7. Your Rights and Choices

Under Indonesian data protection law (UU PDP) and international best practices, you have the right to:

# 7.1 Access and Portability

- Access: Request copies of your personal data
- Portability: Export your data in machine-readable format
- Transparency: Understand how your data is processed

# 7.2 Correction and Updates

- Accuracy: Correct inaccurate or incomplete information
- **Updates**: Modify your account and business information
- **Profile Management**: Control your public business profile

#### 7.3 Deletion and Restriction

- **Deletion**: Request complete account and data deletion
- **Restriction**: Limit processing of specific data categories

• **Objection**: Object to certain types of data processing

# 7.4 Communication Preferences

- **Marketing**: Opt-out of promotional communications
- Notifications: Control service and security notifications
- **Updates**: Choose how you receive platform updates

To exercise these rights, contact our Data Protection Officer at privacy@simplybox.id

# 8. Security Measures

# 8.1 Technical Safeguards

- **Encryption**: End-to-end encryption for sensitive communications
- Access Controls: Multi-factor authentication and role-based permissions
- Network Security: Firewalls, intrusion detection, and secure API endpoints
- Regular Audits: Security assessments and vulnerability testing

# 8.2 Operational Security

- Staff Training: Regular privacy and security training for all employees
- **Incident Response**: Rapid response procedures for security breaches
- **Data Minimization**: Collect and process only necessary information
- **Regular Backups**: Encrypted, geographically distributed backup systems

# 8.3 Compliance Framework

- **ISO 27001**: Following international security management standards
- **SOC 2**: Compliance with Service Organization Control requirements
- **GDPR Principles**: Applying European data protection best practices
- Local Compliance: Adherence to Indonesian UU PDP requirements

### 9. International Data Transfers

When data is transferred outside Indonesia:

- Adequacy Decisions: Transfers to countries with adequate protection levels
- Standard Contractual Clauses: Legal frameworks for secure international transfers
- **Encryption Requirements**: All international transfers use strong encryption
- Regular Reviews: Ongoing assessment of international transfer arrangements

# 10. Children's Privacy

SimplyBox is designed for business use and is not intended for children under 13. We do not knowingly collect personal information from children. If we discover we have collected information from a child under 13, we will delete it immediately.

# 11. Changes to This Privacy Policy

We may update this Privacy Policy to reflect:

- Changes in our services or business practices
- New legal or regulatory requirements
- Enhanced privacy protections
- User feedback and requests

#### 11.1 Notification Process

- Email Notification: Sent to all active users at least 30 days before changes take effect
- **Platform Notification**: In-app notifications and dashboard announcements
- Website Updates: Updated policy posted on our website with revision dates
- **Significant Changes**: Additional consent may be required for material changes

# 11.2 Continued Use

Continued use of our services after policy changes indicates acceptance of updated terms.

# 12. Contact Information

#### 12.1 Data Protection Officer

Email: simplybox.business@gmail.com

Address: Surakarta

**Response Time**: We respond to privacy inquiries within 72 hours

# 12.2 General Support

Email: <a href="mailto:simplybox.business@gmail.com">simplybox.business@gmail.com</a>
Website: <a href="mailto:https://simplybox.vercel.app">https://simplybox.vercel.app</a>

Business Hours: Monday-Friday, 9 AM - 6 PM WIB

# **12.3 Regulatory Contacts**

For complaints about our privacy practices, you may also contact:

**Indonesian Data Protection Authority**: [Contact information when available]

# **Company Information:**

SimplyBox Indonesia

Surakarta

+6281510123155

This Privacy Policy is governed by Indonesian law and is available in both English and Indonesian languages. In case of discrepancies, the Indonesian version prevails.