# **EN Version**

# **Privacy Policy - SimplyBox**

Last Updated: October 18, 2025

Effective Date: October 18, 2025 – Newly Updated Privacy Policy

#### 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

- Social Media Messages: Content, sender/recipient information, timestamps, attachments
- WhatsApp Messages: Message content, phone numbers, message status, delivery confirmations
- Message Metadata: Conversation threads, response times
- 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

**Default behavior:** Files and documents you upload to your knowledge base are used to generate AI responses for your account only. We do **not** use those documents to train cross-customer models unless you explicitly opt in.

Opt-in for cross-customer training: If you choose to opt in, we will:

- Request explicit consent (checkbox/consent flow).
- Describe how your data will be anonymized and aggregated.
- Allow you to withdraw consent; note that withdrawal will not remove data that has already been used in a completed training cycle.
- Knowledge Base Content: Business documents, FAQs, product, and other information uploaded by users
- **Processing Logs**: AI model interactions, response generation metadata

#### 3. How We Use Your Information

We use personal data to:

- Provide and operate the SimplyBox service (message routing, webhooks, RAG calls, UI).
- Generate AI responses that use only your uploaded knowledge base to answer your users (unless you opt-in to cross-customer training see Section 7).
- Perform billing, invoicing, tax compliance, and fraud prevention.
- Maintain and improve the service, including anonymized analytics.

Comply with legal obligations and respond to lawful requests from regulators or courts.

#### 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 related documents (FAQ, Partnership, Marketing, Legal, other) 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

We implement technical and organizational measures to protect data, including:

- **Encryption in transit:** TLS 1.3 for all network traffic.
- Encryption at rest: industry standard encryption (e.g., AES-256) on storage.
- Access controls: role-based access control (RBAC), least privilege, MFA for admin access.
- Logging & monitoring: security logs and alerting for anomalous activity.
- Backups & retention: encrypted backups with a defined retention cycle (see Section 9).
- Vendor due diligence: we review providers' security posture and sign DPAs.

#### 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 and Insragram API for messaging services
- **Resend**: Email Invitation Service
- Supabase: Database hosting and backend services
- **Digital Ocean**: AI and RAG code backend deployment
- Pinecone: Vector database for AI knowledge storage
- **Groq**: AI model inference services (Llama 3.3-70b Versatile)
- 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 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 30 days after deletion
- Communication Data: Stored for 90 days 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

- Supabase primary DB & edge functions, regions: (Singapore, GCP or DigitalOcean)
- DigitalOcean AI inference & RAG compute, regions: (Singapore / FRA / NYC)
- Vercel frontend hosting, regions: [global]

#### 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

## 7.5 Account and Data Termination

You may request to terminate your account and delete your associated data at any time.

**How to Initiate Termination:** You can terminate your account at any time by navigating to the 'Settings' section of your SimplyBox dashboard and following the account deletion instructions.

- Deletion Process: Upon confirming your request through the settings page, we will initiate the data
  deletion process. All personal data linked to your account, including contact details, communication
  data, and knowledge base content, will be permanently removed from our production systems within 30
  days.
- Data That May Be Retained: For legal and operational purposes, certain data may be retained for a longer period, specifically:
  - Billing Information: Transaction records will be kept for up to 7 years to comply with Indonesian tax regulations.
  - Anonymized Usage Data: Aggregated and fully anonymized data, which cannot be linked back to you, may be retained indefinitely for service analysis and improvement.
- **Effect of Termination:** Once your account is terminated, you will no longer be able to access the Service, and your data cannot be recovered.

## 8. Security Measures

## 8.1 Technical Safeguards

WhatsApp provides end-to-end encryption between WhatsApp users' apps. When messages are delivered to SimplyBox via the WhatsApp Business API and processed by our servers (e.g., webhooks, RAG), those messages are decrypted for processing. We protect those messages with TLS 1.3 in transit and AES-256 at rest while they are in our systems.

## 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

We follow industry best practices and align our controls with common frameworks such as ISO 27001 and SOC

- 2. We will not claim certification unless we are formally certified. Where we indicate alignment or that controls follow these standards, this means we apply similar controls and/or are undergoing preparation for audit. If and when we achieve formal certification, we will update this policy.
  - GDPR Principles: Applying European data protection best practices
  - Local Compliance: Adherence to Indonesian UU PDP requirements

# 9. 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.

#### 10. 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

# **10.1 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

## 10.2 Continued Use

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

#### 11. Contact Information

## 11.1 Data Protection Officer

Email: privacy@simplybox.id

Address: Bojongsari

Response Time: We respond to privacy inquiries within 72 hours

# 11.2 General Support

Email: <a href="mailto:support@simplybox.id">support@simplybox.id</a>
Website: <a href="https://simplybox.id">https://simplybox.id</a>

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

# 11.3 Regulatory Contacts

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

**Indonesian Data Protection Authority:** 

## **Company Information:**

SimplyBox

Bojongsari

+62881710715

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.