

Privacy and Confidentiality Statement

Version: 2026-07-30

Effective date: 2026-07-14

Information about personal data processing in the Digital Portal platform.

1. Data controller

SC CREATIVE CONCEPT TECHNOLOGIES S.R.L., Tax ID 37937493, Trade Register no. J40/11951/2017, with registered office at Str. Biserica Enei 2, Sector 1, București, România, is controller for account, authentication, billing, communication, security, and platform usage data.

For data protection questions, contact us at contact@digitalportal.ai. If a Data Protection Officer is appointed, their details will be published in this statement.

For data collected by our customers through forms created in the platform, the customer is usually the controller and Digital Portal acts as processor.

2. Data we process

We process identity and contact data such as name, email address, organisation, role, phone number when provided, and language preferences.

We process authentication and security data such as tokens, login codes, access logs, IP addresses, device identifiers, audit events, and technical browser information.

We process commercial and billing data, including plan, transactions, invoices, tax details, and payment status, directly or through payment providers.

We process customer content, including forms, responses, uploaded files, and metadata, according to customer instructions and platform settings.

3. Purposes and legal bases

Purpose	Example data	Legal basis
Creating and administering accounts	email, name, organisation, role	contract performance or pre-contract steps
Providing the platform and support	configurations, forms, support requests	contract performance and legitimate interests
Security, abuse prevention, and audit	logs, IP address, technical events	legitimate interests and legal obligations
Billing, accounting, and tax	tax data, payments, invoices	legal obligations and contract performance
Operational communications	email, account and service notices	contract performance and legitimate interests
Permitted marketing	email, preferences, interactions	consent or legitimate interests, with opt-out rights

4. Data collected through customer forms

Customers decide what fields and documents their forms request. This data may include sensitive information if a customer configures such a form.

Digital Portal does not determine the purposes of that processing; it provides the technical infrastructure. Questions about a specific form should be addressed to the organisation that published it.

Customers must ensure they have a lawful basis, accurate notices, consent where required, security controls, and appropriate retention periods for collected data.

Customers are responsible for responding to data subject requests about their forms. Digital Portal will route requests concerning customer content to the customer or provide reasonable assistance under the Data

Processing Agreement.

5. Cookies and similar technologies

We use strictly necessary technologies for authentication, security, session continuity, and platform operation.

Non-essential cookies or identifiers for analytics, measurement, or marketing are used only where valid consent or another legal basis is available.

You can manage preferences in your browser and, where available, in the platform preference centre.

6. Recipients and processors

We may disclose data to hosting, cloud infrastructure, authentication, email, support, analytics, monitoring, payment, accounting, and legal service providers.

Providers that process data for us are contractually required to protect it and use it only under instructions.

For processing carried out as a processor, we use sub-processors under the Data Processing Agreement. The relevant sub-processor list is published in the platform or on the Digital Portal website and may be updated on reasonable notice.

We may disclose data to public authorities, courts, or partners where the law requires it or where needed to defend our rights.

7. International transfers

If data is transferred outside the European Economic Area, we use GDPR-permitted mechanisms such as adequacy decisions, standard contractual clauses, and supplementary measures where needed.

On request, we can provide additional information about transfer categories relevant to your account or organisation.

8. Retention

We keep account data for the contractual relationship and reasonable periods afterwards for audit, security, legal defence, and legal obligations.

Billing and accounting data is kept under applicable statutory retention periods.

Customer content is kept according to organisation settings, contract, and customer instructions, except for temporary backups and data retained by law.

9. Your rights

You have rights to information, access, rectification, erasure, restriction, portability, objection, and rights related to automated decisions under the GDPR.

You may withdraw consent at any time for processing based on consent, without affecting previous lawful processing.

To exercise rights, contact us at contact@digitalportal.ai. We respond without undue delay and usually within one month.

You may lodge a complaint with the Romanian National Supervisory Authority for Personal Data Processing (ANSPDCP).

10. Security

We apply proportionate technical and organisational measures, including access control, encrypted traffic, security logs, role separation, and periodic reviews.

No transmission or storage method is completely risk-free. Please use strong passwords, protect email access, and report suspected incidents.

Organisation administrators are responsible for managing users, access rights, sharing settings, exports, and devices used to access the platform.

11. Children

The platform is not directed at children. If a customer collects children's data through forms, the customer is responsible for lawful basis, proper notice, and required consent.

12. AI, analytics, and aggregate data

We do not use customer content or form responses to train general AI models without the customer's express agreement.

We may use technical, usage, aggregated, or anonymised data for security, diagnostics, performance measurement, capacity planning, and service improvement, provided it does not identify the customer or data subjects.

If we introduce AI features that process customer content, we will describe the relevant roles, purposes, and options in the applicable documentation or terms.

13. Updates

We may update this statement for legal, operational, or technical changes. The current version is the one published in the platform.

The current version of this statement applies from the effective date shown above.