

PRIVACY POLICY

This Privacy Policy was last updated on 26.05.2025.

INTRODUCTION

This Privacy Policy (the "**Policy**") describes the practices of Noema Research (hereinafter "**Noema Research**", "**we**" or "**us**") with respect to the Personal Information collected, stored, used, transferred, shared and otherwise processed from or of our users, business partners, and other persons ("**you**") in connection with the use of our website, products or services (the "**Service**").

"**Personal Information**" means, as applicable, information related to an identified or identifiable natural person as defined by Regulation (EU) 2016/679 ("**GDPR**") and the UK Data Protection Act 2018 ("**UK Data Act**") and any other applicable data protection laws, when and as applicable, being referred to as the "**Law**") ("**Personal Information**").

The controller is Straumli AI SRL, a limited liability company incorporated under the laws of Romania, with its registered office at 318 Calea Văcărești Street, block 3B, Staircase 1, Floor 7, Apartment 31, Postal Code 040065, identified with registration no. J40/964/2024, having the Unique Identification Number: 49435610 and EUID: ROONRC.J40/964/2024.

This Policy sets forth your rights and remedies under the Law, so please read it carefully.

For questions or requests regarding the Policy and the exercise of any of your rights hereunder or under the Law, please do not hesitate to contact us by e-mail at privacy@noemaresearch.com.

THE POLICY DESCRIBES, AMONG OTHERS:

- what Personal Information we collect from you;
- the purposes for which we collect and use your Personal Information;
- the grounds on which the processing is carried out;
- how long we process and store Personal Information;
- your rights and how to exercise them;
- to whom we may disclose your Personal Information;
- the countries to which we may transfer your Personal Information;

PERSONAL INFORMATION WE COLLECT

The table below describes the Personal Information we collect:

Categories of Personal Information	Category description
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Users Data	This is Personal Information that is provided by you as a user of the Service directly or through your engagements with the Service. This data may include, without limitation, your email, username, full name, address, IP address, device information (name of the device, operating system, device identifiers, browser type), the dates and times of access, information about the links you click, pages you view, and other information about how you use the Services, and technology on the devices you use to access the Services.
Inputs and Outputs	This is Personal Information that is collected about you when you access and/or use and visit the Service, especially through its LLM API's. This data may include: user chat interactions, URL information, IP addresses, server domain, the type of device/operating system/browser used to access the Services, search history, web page interactions, specific location and services, including cookies. These technologies help us to, if the case and applicable, recognize you, offer analysis on the pentesting results, customize or personalize your experience, market additional products or services to you, and analyze the use of our Service for you.
Online Identification Data	This is Personal Information that is collected about you when you access and/or use the Service. This data may include: IP addresses, the type of device/operating system/device identifiers/browser used to access the Service, date and time of access and user behavior- information about the links you click and navigate. These technologies help us to, if the case and applicable, recognize you, customize or personalize your experience, market additional products or services to you, and analyze the use of our Service for you.
Communication Information	If you communicate with us, including via our social media accounts, we collect your name, contact information, other Online Identifiers Data and the contents of any messages you send.
Authentication Data	When and if you use your Google or Github accounts to connect to the Service, you agree to share with Noema Research your: e-mail address, name and profile picture.
Partners' Data	This is Personal Information that you provide as a business partner or as a representative, contact person, employee, or other collaborator of a business partner of Noema Research. Such data may include your name, e-mail address, telephone, fax, IP address, and other Personal Information that you provide to us.
Professional or work-related data	We use the Personal Information contained in the resumes and job applications we receive or collect in order to initiate or evaluate an employment or collaboration relationship, including your name, email, telephone, fax, home and/or residential address, details of education and training, professional qualifications, education, contact information, LinkedIn profile, other public social media profiles relevant to our vacancies and other information included in your application or otherwise made available to us.

Data on and from events and surveys	When you participate at our events, podcasts, interviews, webinars, conferences, surveys or the like, we collect the Personal Information you provide, such as your name, e-mail address, phone number, location, social media account, job title, company, voice, image, etc.
Data from Third Party Technologies	Noema Research may integrate with third-party products and platforms. Any Personal Information you share with these third-party products may be accessible to us and will be handled according to their respective privacy policies.

PURPOSE AND BASIS OF PROCESSING

When you use or interact with the Service we offer, we use a variety of technologies to process the Personal Information we collect about you for various purposes. We have set out in the table below the purposes for which we process your Personal Information. The column regarding the legal basis applies to you only when the GDPR or the UK Data Act applies or when the applicable Law otherwise requires the disclosure of the purpose.

When we process your Personal Information based on your consent or based on a contract, if we have a legitimate interest after the contract ends or you withdraw your consent, we may continue processing the Personal Information based on our legitimate interest, if applicable and in accordance with the Law.

Please note that you cannot provide sensitive data or special categories of data when interacting with our Services.

We process your Personal Information for these non-limited purposes:

Purpose of processing	Legal basis for the purpose of processing	Type of Data
To provide, maintain and facilitate the Service to you, to support the Service functions and your use of the Service	<ul style="list-style-type: none"> • Contract • Legitimate interest • Consent 	<ul style="list-style-type: none"> • User Data • Inputs and Outputs • Online Identification Data • Communication Information • Authentication Data • Data from Third Party Technologies
To improve the Service (testing, research, internal analytics and product development)	<ul style="list-style-type: none"> • Contract • Legitimate Interest • Consent • Legal obligation 	<ul style="list-style-type: none"> • User Data • Inputs and Outputs • Online Identification Data • Communication Information

For the customization of product and Service offerings

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- Consent
- Contract
- Legitimate interest
-
- Authentication Data
- Data from Third Party Technologies
- User Data
- Inputs and Outputs
- Online Identification Data
- Communication Information
- Authentication Data
- Partners' Data
- Data from Third Party Technologies

For making our recommendations and promotional communications to you, for example through emails, including for third-party products and offerings

- Consent
- Legitimate interest
-
- User Data
- Online Identification Data
- Communication Information
- Authentication Data
- Partners' Data
- Data from Third Party Technologies
- Data on and from events and surveys
- Professional or work-related data

To communicate with you for non-marketing purposes including by sending you Services related e-mails, push notifications, and other messages

- Contract
- Consent
- Legitimate interest
- Legal obligation
-
- User Data
- Inputs and Outputs
- Online Identification Data
- Communication Information
- Authentication Data
- Partners' Data
- Data from Third Party Technologies

To operate our business, including analyzing and monitoring our performance, usage and activities in connection with our Services

- Legal obligation
- Legitimate interest
- Consent
- Contract
-

- Data on and from events and surveys
- Professional or work-related data

- User Data
- Inputs and Outputs
- Online Identification Data
- Communication Information
- Authentication Data
- Partners' Data
- Data from Third Party Technologies
- Data on and from events and surveys

To investigate and resolve disputes, to establish, exercise or defend our legal claims, and to enforce our terms

- Legal obligation
- Legitimate interest
- Consent

- User Data
- Inputs and Outputs
- Online Identification Data
- Communication Information
- Authentication Data
- Partners' Data
- Professional or work-related data
- Data from Third Party Technologies
- Data on and from events and surveys

To investigate and resolve security issues

- Legal obligation
- Legitimate interest
- Contract
- Consent

- User Data
- Inputs and Outputs
- Online Identification Data
- Communication Information

	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Authentication Data • Partners' Data • Professional or work-related data • Data from Third Party Technologies • Data on and from events and surveys
To understand, diagnose, troubleshoot, resolve a fault or other issues related to the Services provided, and to provide customer assistance	<ul style="list-style-type: none"> • Consent • Contract • Legitimate interest • 	<ul style="list-style-type: none"> • User Data • Inputs and Outputs • Online Identification Data • Communication Information • Authentication Data • Data from Third Party Technologies
To de-identify/anonymize Personal Information	<ul style="list-style-type: none"> • Legitimate interest • Consent • Contract • 	<ul style="list-style-type: none"> • User Data • Inputs and Outputs • Online Identification Data • Communication Information • Authentication Data • Partners' Data • Data from Third Party Technologies • Data on and from events and surveys
For research, improvement and development, including developing new products, content, studies, and features	<ul style="list-style-type: none"> • Legitimate interest • Consent • 	<ul style="list-style-type: none"> • User Data • Inputs and Outputs • Online Identification Data • Communication Information • Authentication Data

To fulfil contractual obligations with third parties.

- Legitimate interest
- Consent
- Contract
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- Partners' Data
- Data from Third Party Technologies
- Data on and from events and surveys

- User Data
- Inputs and Outputs
- Online Identification Data
- Communication Information
- Authentication Data
- Partners' Data
- Data from Third Party Technologies
- Data on and from events and surveys

To prevent, detect, investigate fraud, including fraudulent payments and fraudulent use of the Services, abuse, violations and other trust and safety protocols of our terms, unlawful or criminal activity, unauthorized access to or use of Personal Information or Noema Research systems and networks, to protect our rights and the rights of others, and to meet legal, governmental, and institutional policy obligations

- Legal obligation
- Legitimate interest
- Consent
- Contract
-

- User Data
- Inputs and Outputs
- Online Identification Data
- Communication Information
- Authentication Data
- Partners' Data
- Professional or work-related data
- Data from Third Party Technologies
- Data on and from events and surveys

To process job and traineeship applications

- Consent
- Contract
- Legitimate interest

- Partners' Data
- Professional or work-related data

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- Data from Third Party Technologies
- Data on and from events and surveys

COLLECTING YOUR DATA

Where data is requested directly from you, Noema Research asks you to provide those categories of Personal Information that we require for the purposes mentioned above.

If you provide Noema Research with the Personal Information of your users, employees, customers or other third parties, you undertake to inform and obtain their consent to the processing of their data in accordance with the Law before disclosing such data to Noema Research. By using the Service, you warrant, represent and undertake that you have obtained the appropriate consent from each person whose data is transmitted.

Noema Research may obtain Personal Information from third party sources, including third-party tracking technologies such as cookies.

SHARING PERSONAL INFORMATION

There are certain circumstances in which we may disclose, transfer or share your data with certain third parties with or without notifying you in advance, as you will see below:

Categories of recipients	Reason for data sharing
Service providers	For the purposes described in this Policy, such as business and App functionality purposes, including Services and data hosting, online advertising technologies, cloud hosting, research, auditing, data processing, and to ensure compliance with industry standards, we work with service providers, primarily digital service providers, who work on our behalf and who may need access to certain Personal Information in order to provide their services to us and for us to provide our Services to you. These companies include providers of management services, hosting services, email correspondence, cloud services, database management, advertising services such as Google Cloud, Google Analytics, Hunter.io, Stripe, Discord, Anthropic, OpenAI etc.).
Payment processors	We (but most likely you directly) will share your Personal Information with our payment processors (such as Stripe) as necessary to enable them to process your payments and for anti-fraud purposes.
Law enforcement	We share your Personal Information when we believe in good faith that it is necessary to do so in order to comply with a legal obligation under applicable law. We also share your Personal Information when we have a good-faith belief that doing so is necessary for our legitimate interests, rights and safety or those of a third party.

Buyers of our business	We will share your Personal Information if we sell or negotiate the sale of our business, assets and/or data to a buyer or potential buyer, if we are implied in corporate transactions, bankruptcy, change of control or other situation involving the transfer of our business, assets and/or data.
Relevant authorities	We will share your Personal Information with governmental regulatory authorities, as required by law, including for legal, tax or accounting purposes, in response to their requests for such information or to assist in investigations, based on their legal obligations. These public authorities or institutions may be relevant data protection authorities or consumer protection authorities.
Credit and fraud prevention	We may share your Personal Information with credit reference and fraud prevention entities or debt collection entities (for outstanding debts owed to us).
Noema Research's employees and contractors	In order to ensure that the Service is working and to guarantee compliance with the applicable legislation, Noema Research's collaborators and contractors may process your Personal Information.
Third parties	We may also disclose Personal Information to third parties in connection with claims, disputes or litigation, when otherwise permitted or required by law, or if we determine its disclosure is necessary to protect the health and safety of you or any other person, to protect against fraud or credit risk, to enforce our legal rights or the legal rights of others, to enforce contractual commitments that you have made, or as otherwise permitted or required by applicable law.
With an individual's consent	Noema Research will otherwise disclose Personal Information when an individual gives us permission or directs us to disclose this information.

DATA SECURITY

We have implemented at least reasonable and appropriate physical, technical and organizational measures to protect the data we collect and to prevent unauthorized access, disclosure and misuse of your Personal Information, such as encryption.

Our Service may involve integrations with third party LLM's, such as OpenAI, or may direct you to, websites, apps, and services managed by third parties.

By interacting with these third parties, you are providing information directly to the third party and not to Noema Research and you are subject to the third party's privacy policy.

If you access third-party services, such as social media sites or other sites linked through the Service (e.g., if you follow a link to our Instagram account), these third-party services will be able to collect Personal Information about you, including information about your activity on the Services. If we link a site or service via our Services, you should read their data usage policies or other documentation. Our linking to another site or service doesn't mean we endorse it or speak for that third party.

CHILDREN

To use our Services, you must be at least 18 years old.

RETENTION PERIOD

We will store and process your Personal Information for the period of time necessary to achieve the purposes described in this Policy and in accordance with our legal and contractual obligations.

For the use of the Service, we store your data for the duration set forth in the table below, depending on the use case of that Personal Information, unless otherwise required by law or unless we have legitimate interests that allow us to do so for a longer term case in which data will be stored for this latter longer term. Thereafter, the data will be erased in accordance with our procedures, which may involve anonymization or destruction.

Use case	Retention period
User/account data	3 years after account inactivity
Network activity information	3 years
Analytics data	3 years
Communication information	3 years
Support tickets	3 years after resolution
Marketing data/ preferences	2 years after last interaction

If you ask us to, we will delete or anonymize your Personal Information so that it can no longer be identified, unless we are permitted or required by law to retain certain Personal Information, including in situations such as the following:

- If there is an unresolved issue related to your use of the Service, such as an outstanding claim or an unresolved complaint or dispute, we will retain the necessary Personal Information until the issue is resolved;
- Where we need to retain Personal Information for our legal, tax, audit and accounting obligations, we will retain the Personal Information required for the period required by applicable law;
- When necessary for our legitimate business interests, such as to prevent fraud or to maintain the security of our users; and/or
- To enforce our rights and those of third parties.

YOUR RIGHTS AS PER GDPR AND UK DATA ACT

You have a number of rights in relation to the usage of your Personal Information by Noema Research, which you can exercise by sending an e-mail to privacy@noemaresearch.com.

Right to information. You have the right to know how we handle your Personal Information in an appropriate and transparent way and what rights you can exercise in this respect. In this Policy, we have explained in detail what Personal Information we collect from you and how we handle your Personal Information.

Right of access. You have the right to access your Personal Information we hold at any time. Please use your Authentication Data. In addition, we may ask you questions to verify your identity.

Right to rectification. You have the right to rectify the Personal Information we hold about you where it is incorrect or out of date and/or to complete such data where it is incomplete. You can do this yourself 24/7 in your App account. Please note that we cannot guarantee the factual accuracy of Outputs.

Right to withdraw. This right entitles you to object to further processing of your Personal Information under the conditions and within the limits provided by law. In particular, if you have given your consent to our use of your Personal Information, you have the right to withdraw this consent at any time.

Right to object to direct marketing. If Personal Information is processed for direct marketing purposes, you have the right to object at any time and free of charge to the processing of your Personal Information for direct marketing purposes by clicking on the "Unsubscribe" box when you receive such an email or by emailing us at privacy@noemaresearch.com. If you object to processing for direct marketing purposes, your Personal Information will no longer be processed for such purposes. However, these opt-outs do not apply to communications that relate to order fulfillment, agreements, support, warnings about the safety of our products, or other administrative and transactional notices, where the primary purpose of such communications is not promotional.

Right to data portability. You have the right to receive the Personal Information you have provided to us, in the context of the agreement you have entered into with us, to store this Personal Information in a database of your own or a third party. Please include your and account ID, name and e-mail address. In addition, we may ask you questions to verify your identity.

Right to restriction of processing. You have the right to obtain restriction of the processing of your Personal Information in certain cases (for example, where you contest the accuracy of your Personal Information, for a period of time, to allow us to verify the accuracy).

Right to have your account forgotten/deleted. In some cases, you have the right to be forgotten. In this case, we will assess whether we can delete your data or whether we need to retain certain data to comply with a legal obligation. You can ask us to delete (part of) your Personal Information.

Right to complain. If you disagree with the way we handle your Personal Information, you have the right to lodge a complaint. If you have a complaint, we would like to resolve it with you first. Please include your name, e-mail address and Authentication Data when contacting us.

At the same time, you have the right to lodge a complaint directly to the National Supervisory Authority for Personal Information Processing (ANSPDP), with headquarters in Bulevardul Gheorghe Magheru nr. 28 - 30, sector 1, Bucharest (postal code: 010336; phone no: 0040 318.059.211).

Please note that under many countries' laws, you have the right to lodge a complaint with the supervisory authority in the place in which you live or work. A full list of EU supervisory authorities' contact details is available [here](#). In the UK, you have the right to lodge a complaint with the [UK Information Commissioner's Office](#).

You also have the right to lodge a complaint with the competent court of law against us if you believe that your rights under the GDPR have been violated as a result of our processing your Personal Information, as well as against a legally binding decision of the ANSPDP relating to you and your Personal Information.

There is usually no fee for exercising the above rights.

You will not have to pay a fee to access your Personal Information (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

TRANSFERS TO OTHER COUNTRIES

Noema Research SRL is based in Romania. In principle, we do not transfer data outside of the EU. Should we, however, whenever we transfer your Personal Information outside the EU, we endeavor to ensure that one of the following safeguards is in place:

- we only transfer your Personal Information to countries that have been deemed to provide an adequate level of protection of Personal Information. For more details in the EU, please see European Commission: [Adequacy Decisions](#);
- where we use certain service providers, we may use specific contracts, which provide the same protection for Personal Information as in the EU or the UK;
- where such data cannot be afforded one of the above protections, we will only transfer it outside of these territories if it is necessary for the performance of our contract with you or if we have your free, informed, clear and specific consent.

CHANGES TO OUR POLICY

We may change this Policy from time to time. If we make material changes to the way in which we use or disclose information we collect, we will use reasonable efforts to notify you (such as by emailing you at the last email address you provided us, by posting notice of such changes on the Service, or by other means consistent with applicable law) and will take additional steps as required by applicable law. If permitted by law, your continued use of the Services after this Policy has been updated indicates your acceptance of changes made. In some cases, you will be given a choice to accept changes to this Policy. If you do not accept the terms of the updated Policy, you are not allowed to continue using or accessing the Services.