

creiamo.ai — Privacy Notice v1.1

Privacy Notice

VERSION 1.1 (DRAFT) · EFFECTIVE [DATE ON PUBLICATION] · CONTROLLER: CREIAMO.AI INC. ·
REGULATION (EU) 2016/679 (GDPR) · UK GDPR

This notice explains what personal data creiamo.ai collects through this website and when you contact us, why we process it, who else sees it, how long we keep it, and the rights you have over it.

01 Who we are and how to reach us

creiamo.ai Inc. ("creiamo.ai", "we", "us") is the controller of the personal data described in this notice — we decide why and how it is processed.

Controller	creiamo.ai Inc., a company incorporated in Delaware, United States
Registered address	2093 Philadelphia Pike #1861, Claymont, DE 19703, United States
Privacy contact	hello@creiamo.ai
EU representative	[NAME, ADDRESS, EMAIL — APPOINTMENT IN PROGRESS]
UK representative	[NAME, ADDRESS, EMAIL — APPOINTMENT IN PROGRESS]

creiamo.ai is established in the United States and has no establishment in the EU, the EEA or the United Kingdom. Because we offer services to organisations in the EU, the GDPR applies to this processing under Art. 3(2)(a), and we are required to designate a written representative in the Union under Art. 27. Because we offer services to organisations in the UK, the UK GDPR applies in the same way and requires a UK representative under its Article 27. Both appointments are in progress; this notice takes effect only once they are named above. Either representative can then be addressed by you or by a supervisory authority in addition to, or instead of, us.

Data protection officer

We have not appointed a data protection officer. Our processing does not meet the Art. 37(1) thresholds: we are not a public authority, our core activities do not require regular and systematic monitoring of data subjects on a large scale, and we do not process special categories of data on a large scale. Privacy questions go to hello@creiamo.ai.

02 What this notice covers

This notice applies to personal data we handle as a controller:

- your visit to the creiamo.ai website;
- the "Request a scoping call" form and any other enquiry form on the site;
- email and correspondence between us, including during a commercial discussion.

It does not cover personal data inside your device documentation or datasets. When we perform an engagement — gap assessment, evidence generation, post-market monitoring — any personal data contained in your technical file, clinical or performance datasets, or post-market data is processed on your instructions. You are the controller and creiamo.ai is a processor. That processing is governed by the data processing agreement in the engagement contract under Art. 28, not by this notice. See section 13.

In this notice, "GDPR" means Regulation (EU) 2016/679 and, if you are in the United Kingdom, the UK GDPR read together with the Data Protection Act 2018. The article numbering is the same in both, and so are your rights.

This site is addressed to professionals acting for their organisations. It is not directed at children, and we do not knowingly collect personal data about anyone under 16.

03 What personal data we collect

Category	Data	Source
Enquiry details	Name, work email address, organisation	You, via the form
Enquiry context	Your role, the regulatory route(s) you tick, where your device is today	You, via the form
Correspondence	The content of emails and messages you send us, and our replies	You
Referral details	Your name, work email, organisation, role, and the context of the introduction	A third party — an investor, adviser or mutual contact who introduces us
Technical data	IP address, browser user-agent, date and time, pages and files requested, referrer	Automatically, in server logs

Not everything arrives through the form. If someone introduces us — an investor forwarding your details, a mutual contact suggesting we talk — we receive a small amount of personal data about you from them, not from you. Where that happens, this notice is the information we owe you under Art. 14: we will link to it in our first message to you, and in any event within one month. We use referral details only to respond to the introduction, and if nothing comes of it they fall under the same retention rule as any other enquiry (section 8).

Please do not send us special category data. We do not ask for and do not want health data, patient records, or any other Art. 9 data in an enquiry. If you need to discuss a dataset containing it, tell us that it exists and we will agree a lawful route before anything is transferred.

04 Why we process it, and on what legal basis

Purpose	Data used	Legal basis
Reply to your scoping request, hold the call, and prepare a proposal	Enquiry details and context, correspondence	Art. 6(1)(b) — steps taken at your request prior to entering into a contract
Respond to investor enquiries and introductions	Enquiry details, referral details, correspondence	Art. 6(1)(f) — our legitimate interest in financing and building the business
Operate, secure and troubleshoot the website; detect and block spam and abuse	Technical data	Art. 6(1)(f) — our legitimate interest in network and information security
Meet legal and regulatory obligations	Whatever the obligation requires	Art. 6(1)(c)
Establish, exercise or defend legal claims	Whatever the claim requires	Art. 6(1)(f) — our legitimate interest in defending our position

Our legitimate interests, and your right to object

Where we rely on legitimate interests we have weighed our interest against your rights and freedoms. The data involved is ordinary business-contact data, given by you or by the person introducing us in a professional capacity, used for the purpose it was supplied for. You can object at any time under Art. 21(1) — see section 9. Ask us for the balancing assessment and we will send it.

What we do not do. We send no newsletter and no marketing emails. We do not sell, rent or share personal data with third parties for their own purposes. We do not use your personal data to train AI models, ours or anyone else's. We do not build profiles of you.

05 Cookies, analytics and tracking

This site sets no cookies. It runs no analytics, no advertising or social-media pixels, no session recording, and no fingerprinting. Nothing is written to or read from your device beyond your browser's ordinary cache of the page and its fonts. That is why you see no cookie banner — there is nothing to consent to under Article 5(3) of the ePrivacy Directive, or under regulation 6 of PECR, its UK equivalent.

Your browser contacts no third party at all. Everything this page needs — the markup, the styles, the two typefaces, the logo — is served from creiamo.ai itself. There is no font host, no tag manager, no embedded video, map or social widget. You do not have to take our word for it: open your browser's network panel, reload, and read the list of hosts.

Do Not Track and Global Privacy Control. Some browsers send signals — DNT, GPC — asking sites not to track you or not to sell your data. We respond to them the only way a site that tracks no one and sells nothing can: there is nothing to switch off. We say this expressly because California law requires every site collecting data from California residents to disclose how it responds to Do Not Track signals.

06 Who else sees your data

We keep the list short on purpose. Each processor is engaged under a written contract meeting Art. 28, and processes personal data only on our instructions.

Recipient	Role	What it sees	Where
Vercel Inc.	Website hosting, CDN and serverless functions	Technical data in server logs; your form submission in transit	United States, global edge network
Resend	Transactional email delivery (SMTP)	Your name, work email, organisation, role, route and stage — to send you a confirmation and to notify us	United States
[Mailbox provider - not yet set up]	Hosts the hello@creiamo.ai mailbox	Your correspondence with us	[TBC]
Professional advisers	Lawyers, accountants, auditors, where genuinely needed	Only what the matter requires	Case by case
Public authorities	Where we are legally compelled to disclose	Only what the law requires	Case by case

A note on typefaces

This site is set in Schibsted Grotesk and Spline Sans Mono. Both are served from creiamo.ai itself. Loading them from Google Fonts — the ordinary way to use them — would have transmitted your IP address to Google LLC in the United States on every visit, before you had done anything on the page. We host the files instead, so that disclosure does not happen and Google is not a recipient of your data.

07 Transfers outside the EEA and the UK

creiamo.ai is in the United States and so are most of our processors. Personal data covered by this notice therefore leaves the EEA and the UK. Those transfers rely on:

- the EU–US Data Privacy Framework and its UK Extension, where the recipient is certified under it — an adequacy decision under Art. 45; and otherwise
- Standard Contractual Clauses (Commission Implementing Decision (EU) 2021/914), with the UK International Data Transfer Addendum for UK transfers — appropriate safeguards under Art. 46(2)(c); supported by a transfer impact assessment and, where warranted, supplementary technical measures.

Vercel Inc. and Resend are certified under the EU–US Data Privacy Framework, including its UK Extension; transfers to them rest on the adequacy decision, with the Standard Contractual Clauses standing behind it if a certification ever lapses. We check each recipient against the official Data Privacy Framework list whenever we update this notice.

Vercel serves this site from a global edge network, so technical data in server logs may be processed at edge locations outside the United States and the EEA. The same safeguards travel with it.

Ask us at hello@creiamo.ai for a copy of the safeguards in place for any specific transfer.

08 How long we keep it

Data	Retention
Enquiry that does not become an engagement	24 months from our last substantive contact, then deleted or irreversibly anonymised. Regulatory submission cycles run long — this keeps the thread alive across one, and no further.
Enquiry that becomes an engagement	Kept for the life of the engagement and then per the retention terms of the engagement contract and applicable limitation periods.
Email correspondence	24 months, unless it is needed for an ongoing engagement or a legal claim.
Server logs	180 days

You can ask us to delete your enquiry sooner. Unless we need it for a live engagement or a legal claim, we will.

09 Your rights

Under the GDPR you have the following rights over your personal data. They are free to exercise, and you exercise them by writing to hello@creiamo.ai.

Right	What it means here	Article
Access	Get confirmation of whether we hold data about you, a copy of it, and the information in this notice	Art. 15
Rectification	Have inaccurate data corrected and incomplete data completed	Art. 16
Erasure	Have your data deleted where one of the grounds applies — including where you object and we have no overriding ground	Art. 17
Restriction	Have us pause processing while a dispute about accuracy or grounds is resolved	Art. 18
Portability	Receive the data you gave us in a structured, machine-readable format, or have it sent to another controller	Art. 20
Objection	Object to processing based on legitimate interests. We stop unless we show compelling legitimate grounds that override your rights	Art. 21
Automated decisions	Not be subject to solely automated decisions with legal or similarly significant effects — we make none, see section 11	Art. 22

Consent

We do not rely on consent for any processing described here, so there is no consent for you to withdraw. If that ever changes, withdrawing will be as easy as giving it, and will not affect the lawfulness of processing carried out beforehand.

How we respond

We answer within one month of receiving your request (Art. 12(3)), extendable by two further months for complex or numerous requests — we will tell you within the first month if we need that. We may ask for enough information to confirm your identity, and no more.

Complaints

If you think we have handled your data badly, tell us first — we would rather fix it. You also have the right to complain to a supervisory authority (Art. 77), in the EU Member State of your habitual residence, your place of work, or where the alleged infringement took place. The list of national authorities is published by the European Data Protection Board at edpb.europa.eu. In the UK, the authority is the Information Commissioner's Office at ico.org.uk. You may also address our EU or UK representative named in section 1.

10 If you are in the United States

This notice is written to the GDPR standard, which asks more of us than current US law asks of a site like this. Two things US law wants said expressly:

We do not sell or share personal information, as the California Consumer Privacy Act defines those terms, and we have not done so in the preceding twelve months.

Comprehensive state privacy laws — California's CCPA/CPRA and its counterparts in other states — apply to businesses above thresholds of revenue and volume that we do not currently meet. If we grow past them, this notice will change before our practices do. In the meantime we do not wait for the law: the rights in section 9 are open to anyone who writes to hello@creiamo.ai, wherever you are.

For how we respond to Do Not Track and Global Privacy Control signals, see section 5.

11 Automated decision-making and profiling

We do not make decisions about you by solely automated means that produce legal effects or similarly significantly affect you, and we do not profile you. A human reads every enquiry. The only automated step in the form is a hidden spam trap that discards submissions filled in by bots — it evaluates the submission, not the person.

12 Do you have to give us this data?

No. Providing it is neither a statutory nor a contractual requirement. But we cannot answer a scoping request without a name, a work email address and an organisation — the only consequence of not providing them is that we cannot reply. Your role, regulatory route and device stage are optional context that lets us come to the call prepared.

13 When we are a processor, not a controller

During an engagement we may process personal data that sits inside your technical documentation, your training, validation or clinical datasets, or your post-market data. In that role we act only on your documented instructions. You remain the controller and we are your processor.

That relationship is governed by the data processing agreement in the engagement contract, which sets out subject matter, duration, purpose, categories of data and data subjects, sub-processor terms, security measures, audit and assistance obligations, and what happens to the data at the end — as Art. 28(3) requires. This notice does not govern it, and nothing here overrides it.

14 How we protect it

- All traffic to and from this site is encrypted in transit over TLS; the site is served over HTTPS only, with HSTS.
- Enquiry data is transmitted directly to our email provider and stored in our mailbox. We keep no marketing database and no CRM of our own.
- Access to enquiry data is limited to the people who need it to answer you — currently the two founders.
- Our processors are chosen for their own security posture and are contractually bound to appropriate technical and organisational measures.
- No payment or financial data is collected through this website.

No system is perfectly secure. If a breach occurs that is likely to result in a risk to your rights and freedoms, we will notify the competent supervisory authority within 72 hours under Art. 33, and notify you directly where the risk is high under Art. 34.

15 Changes to this notice

We update this notice when our processing changes. The version number and effective date at the top always tell you which one you are reading. Where a change materially affects people whose data we already hold, we will tell them directly where that is practicable.

16 Contact

Email	hello@creiamo.ai
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Post	creiamo.ai Inc., 2093 Philadelphia Pike #1861, Claymont, DE 19703, United States
EU representative	In progress
UK representative	In progress