Lift Relations Privacy Policy

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This Privacy Policy explains how Lift Relations ApS processes personal data through our website (lft.ai), the Lift Relations platform (the "Platform") and our related services. "Personal data" means any information relating to an identified or identifiable individual.

1. Who we are

Lift Relations ApS, CVR no. 33356706, Sortedam Dossering 55, 2100 Copenhagen Ø, Denmark ("Lift Relations", "we", "us"). Contact for all privacy matters: legal@lft.ai.

2. Our two roles

As controller, we decide how and why personal data is processed for our own business: running our website, marketing and sales, managing customer accounts, billing, support, and creating aggregated, de-identified benchmarks and using pseudonymised survey data to improve our Services and models, as described in section 6.

As processor, we process personal data on behalf of our customers (professional services firms) when they use the Platform to survey their clients and their own teams. In that role our customer is the controller, and our processing is governed by our Data Processing Agreement with them. If you responded to a survey sent through the Platform, the organisation that invited you is responsible for that processing, and you can contact it directly. We will forward any request we receive about such data to the relevant customer.

3. What we collect

Who	Personal data	Source
Website visitors	IP address, device and browser data, pages visited, cookie identifiers	Directly, through cookies and similar technologies
Prospects and business contacts	Name, job title, company, business email, phone, correspondence, meeting notes	Directly, at events, or from B2B data providers
Customer users	Name, job title, company, business email, username, login and usage data, support correspondence	From the user or their employer
Survey respondents (customer data, processed for our customers)	Name, job title, company, business email, survey scores and comments	From our customer and from the respondent

We do not ask for, and ask customers not to submit, special categories of personal data such as health, religion or political opinions.

4. How and why we use personal data

- To provide, secure, maintain and support the Platform and our services
- To manage customer accounts, contracts, billing and support
- To create aggregated, de-identified benchmarks and to improve our Services and models (section 6)
- To operate, analyse and improve our website

- To market our services to business contacts, and to manage our sales relationships
- To send service communications, such as product updates, security notices and changes to our terms
- To prevent misuse, fraud and security incidents, and to comply with legal obligations

5. Legal bases (EU/UK)

Purpose	Legal basis
Providing the Platform and managing customer accounts	Performance of a contract, and our legitimate interest in serving our business customers' users
Processing survey data for customers	We process as our customer's processor; our customer determines the legal basis
Creating aggregated, de-identified benchmarks and improving our Services and models	Our legitimate interest in providing industry benchmarks and better products, as permitted under our customer agreements and subject to the safeguards in section 6
Website analytics and non-essential cookies	Consent
Business-to-business marketing and sales	Legitimate interest; consent where required by law
Security, fraud prevention and legal compliance	Legitimate interest and legal obligation

6. Benchmarks, analytics and AI

Industry benchmarks are a core part of our Services. As permitted under our customer agreements, we combine survey results across customers and de-identify them so that they no longer identify any customer, any customer's clients or any individual ("Aggregated Data"). We only show a benchmark when it is calculated from data relating to at least five customers in the peer group shown. Aggregated Data is not personal data.

We also use survey data in pseudonymised form to develop, train and improve the scoring, predictive and analytical models in our Services. When we do so:

- we do not use one customer's data to score or profile individuals for another customer;
- we remove names, company names and other direct identifiers from free-text comments first;
- our models do not contain or reproduce survey data in a form that identifies anyone; and
- we do not allow third-party AI providers to use the data to train their own models.

You may object to our use of your survey responses for model development at any time by contacting legal@lft.ai.

The Platform uses AI to produce sentiment analysis, summaries, scores, risk and opportunity indicators and recommended actions for our customers about their client relationships, including the individuals involved. These are decision support for our customers. We do not make decisions with legal or similarly significant effects about individuals based solely on automated processing.

7. If you responded to a survey

Surveys sent through the Platform are run by the organisation that invited you, and that organisation is the controller of your responses. Your responses are shared with that organisation in the way it

has set up the survey, which may include your name. That organisation receives insights based on your responses about its relationship with you and your organisation. We process your responses on its behalf, and in aggregated, de-identified form as described in section 6. We are the controller only for creating de-identified benchmarks and for using pseudonymised responses to develop our models (section 6); you can contact us directly about that use, including to object to it. To exercise your other rights over your responses, please contact the organisation that invited you; if you contact us, we will pass your request on.

8. Who we share personal data with

We do not sell personal data, and we do not share it for cross-context behavioural advertising. We share it only with:

- **Service providers (sub-processors)** that host, operate and support our website and Platform, such as cloud hosting, email delivery, translation and text analysis, AI, support and monitoring providers. They act on our instructions under written data protection terms. Our current list of sub-processors is published at lft.ai/legal.
- **Our customers**, for the survey data we process on their behalf.
- **Professional advisers**, such as lawyers, auditors and insurers, under confidentiality obligations.
- **Authorities**, where required by law or to protect our rights, users or the security of our Services.
- **A buyer or successor**, if all or part of our business is sold, merged or reorganised, subject to equivalent protection of personal data.

9. International transfers

We host the Platform and store customer data in Microsoft Azure data centres in the European Union. Some service providers process personal data outside the EU/EEA, mainly in the United States. In that case we rely on an adequacy decision, including the EU-US Data Privacy Framework for certified providers, or on the European Commission's Standard Contractual Clauses, with additional safeguards where needed. You can ask us for a copy of the relevant safeguards at legal@lft.ai.

10. How long we keep personal data

Data	Retention
Customer and survey data in the Platform	For the term of the customer agreement, or up to 12 months longer where the customer asks us to keep it; then exportable on request for 30 days, deleted from the Platform within the following 30 days and from backups in line with our standard backup cycle
Pseudonymised survey data used for model development	As long as needed to develop and validate our models, reviewed at least once a year
Customer account, contract and billing records	For the customer relationship, and afterwards as long as required by Danish bookkeeping and tax law
Prospect and business contact data	Until you object or unsubscribe, and in any case no longer than three years after our last interaction
Website analytics and cookie data	As set out in our cookie settings, and no longer than 13 months
Security and system logs	At least 90 days, and no longer than needed for security purposes

Aggregated Data is not personal data and may be kept without time limit.

11. Security

We protect personal data with technical and organisational measures appropriate to the risk, including EU hosting on Microsoft Azure, encryption in transit (TLS 1.2 or higher) and at rest (AES-256), role-based access control, logging and monitoring, daily backups, secure development practices and staff training. No system is completely secure; if a personal data breach affects you, we will notify you and the competent authorities as required by law.

12. Your rights

Under EU and UK data protection law you have the right to access your personal data, to have it corrected or erased, to restrict or object to its processing (including to processing based on our legitimate interests and to direct marketing at any time), to data portability, and to withdraw consent at any time without affecting earlier processing. To exercise your rights, email legal@lft.ai. We may need to verify your identity and will respond within one month. For survey responses we process for a customer, see section 7.

You also have the right to complain to a supervisory authority. Our lead authority is the Danish Data Protection Agency (Datatilsynet), www.datatilsynet.dk.

13. Cookies and similar technologies

Our website and Platform use strictly necessary cookies to work and to keep you signed in. With your consent, we also use analytics and session-insight tools, such as Google Analytics and Microsoft Clarity, to understand how our website and Platform are used and to improve them. These tools are configured to mask survey content. You can accept, reject or change your choices at any time through the cookie settings on our website and in the Platform.

14. Residents of the United States

We do not sell personal information and do not share it for cross-context behavioural advertising. When we process personal information for our customers, we act as their service provider. Residents of US states with consumer privacy laws may request access to, correction or deletion of their personal information by emailing legal@lft.ai, and we will not discriminate against anyone for exercising these rights.

15. Children

Our services are designed for businesses and are not directed at children. We do not knowingly collect personal data from anyone under 16. If you believe we have, contact legal@lft.ai and we will delete it.

16. Changes and contact

Each version of this Privacy Policy carries a version number and effective date, and previous versions are available at lft.ai/legal. We will notify customers of material changes by email before they take effect.

Lift Relations ApS, Attention: Legal, Sortedam Dossering 55, 2100 Copenhagen Ø, Denmark · legal@lft.ai