# **Privacy Policy**

Last updated: 09 September 2025

# Who we are (Legal entity)

## Strahberger Organisationsentwicklung (sole proprietorship)

Washingtonstrasse 21, 9400 Rorschach, Switzerland

UID/VAT: CHE-225.291.091 • Commercial Register No.: CH-320.1.101.941-8

Operating Name / Brand: "CEEQ.IT"

Contact: privacy@ceeq.it

## **Roles under GDPR/FADP**

- Workspace content (e.g., tasks, comments, sprint data): Customer is Controller, CEEQ.IT is Processor under the DPA.
- Account, billing, website and anti-abuse data: CEEQ.IT is Controller.

## Data we process

## Information you provide

- Account data (name, business email), workspace content (tasks, comments, sprint records).
- Integrations (e.g., metadata from Jira/Azure DevOps if connected by Customer).

#### **Automatically collected**

- Technical telemetry (IP, device/browser, log timestamps) for security/operations.
- Usage analytics (feature usage, performance) subject to consent where required.

## Purposes & legal bases

- Service delivery (contract performance: Art. 6(1)(b) GDPR / legitimate interest: Art. 6(1)(f)).
- Security & fraud prevention (legitimate interest; legal obligations).
- Support & operations (legitimate interest/contract).
- Optional communications/analytics (consent where required).

# Controller/Processor workflow (Data subject rights)

For workspace content, please contact your employer (Customer/Controller). We support the Controller in responding to requests (access, deletion, portability) under the DPA. For account/billing/website data controlled by CEEQ.IT, contact privacy@ceeq.it; we respond within 30 days.

## **International transfers**

Primary processing locations are in the EU/EEA and Switzerland. Switzerland benefits from an EU adequacy decision. For transfers to other countries (e.g., US subprocessors), we use the **2021 EU Standard Contractual Clauses** plus transfer risk assessments as appropriate.

# **Sub-processors**

We engage vetted sub-processors (see our Sub-processors document). We will notify Customers of material changes as described there.

# **Security measures**

We maintain appropriate technical and organizational measures (TOMs), including encryption in transit (TLS), encryption at rest, role-based access control, least privilege, logging/monitoring, vulnerability management, backups and incident response. Further details are outlined in the DPA Annex (TOMs).

# Retention

- **Customer (workspace) data:** retained for the subscription term and **deleted or returned** per Customer's instructions under the DPA (incl. backup/archival timelines).
- Account/website data: retained per operational/legal needs; schedules available on request.

## **Cookies & consent**

We use essential cookies for core functionality. Non-essential cookies/analytics are based on your consent where required. Manage preferences via our Cookie Policy and consent tools.

#### Children's data

The Service is not directed to children; we do not knowingly process children's data.

# **Changes**

We may update this Policy; material changes will be announced in-app or by email. The latest version applies.

## **Company Information**

## Strahberger Organisationsentwicklung

Washingtonstrasse 21 9400 Rorschach, Switzerland UID/VAT: CHE-225.291.091

#### **Contact**

Legal: legal@ceeq.it Privacy: privacy@ceeq.it Support: support@ceeq.it

Website: ceeq.it