

# Privacy Policy

Qeron · Pipeline-as-a-Service · Effective date: 29 April 2026 · GDPR-compliant

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## 1. WHO WE ARE

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Qeron ('we', 'us', 'our') is a professional Pipeline-as-a-Service company established under Spanish law, subject to applicable EU law including the GDPR (Regulation (EU) 2016/679). Qeron acts as data controller for personal data processed in its own business activities. Our contact details are in Section 11.

## 2. SCOPE OF THIS POLICY

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This Policy explains how we collect, use, store, and protect personal data of contact persons and representatives of our business clients and prospective clients ('Business Contacts') in a B2B context.

Where Qeron collects, processes, or delivers data on behalf of a client as part of a pipeline engagement, the client acts as data controller for that data and is responsible for its own lawful basis and compliance obligations. Qeron's role in such processing is governed by a Data Processing Agreement ('DPA') with the client.

## 3. PERSONAL DATA WE COLLECT

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### 3.1 Business Contact Data

- Full name, job title, and professional role
- Business email address and telephone number
- Business postal address
- LinkedIn or other professional profile URL (where provided)

### 3.2 Contractual & Financial Data

- Contract, proposal, and statement of work records
- Invoice and payment records
- Business correspondence

### 3.3 Pipeline Operations Data

In the course of providing the Pipeline service, Qeron processes data about business professionals sourced from publicly available sources, data providers, and web scraping. This data is processed on behalf of and delivered to clients. Qeron treats such data in accordance with applicable data protection law and its DPA with each client.

### 3.4 Technical Data

- IP address, browser type, and access logs when visiting our website
- Cookies and analytics data (see Section 8)

## 4. HOW WE COLLECT PERSONAL DATA

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- Directly from you — when you contact us, engage our services, or correspond with us;
- From your organisation — when your employer shares your details as a designated contact;
- From publicly available sources — such as LinkedIn, company websites, or business registers;
- Automatically — through cookies when you visit our website.

## 5. LEGAL BASES FOR PROCESSING

<b>Purpose</b>	<b>Legal basis</b>	<b>Details</b>
Contract performance	Art. 6(1)(b)	To deliver pipeline services and manage the client engagement.
Legitimate interests	Art. 6(1)(f)	To manage business relationships, conduct direct marketing to existing clients, and operate the pipeline securely.
Legal obligation	Art. 6(1)(c)	To comply with tax, accounting, and regulatory requirements.
Consent	Art. 6(1)(a)	For non-essential cookies and certain marketing communications (withdrawable at any time).

## 6. HOW WE USE YOUR PERSONAL DATA

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- Delivering and managing pipeline and consultancy services;
- Communicating about ongoing or prospective engagements;
- Issuing invoices and managing payments;
- Meeting legal, regulatory, and accounting obligations;
- Improving our services and website;
- Sending relevant professional communications (you may opt out at any time);
- Resolving disputes or enforcing our contractual rights.

## 7. DATA SHARING AND TRANSFERS

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### 7.1 Third-Party Service Providers

We share data with trusted processors, including cloud hosting, accounting software, CRM platforms, third-party data providers (for pipeline enrichment), and professional advisors. All processors are bound by GDPR-compliant data processing agreements.

## 7.2 Pipeline Data Providers

In delivering the Pipeline, Qeron may receive data from or transmit data to third-party data suppliers. Each such supplier is contractually required to represent that their data is collected and licensed lawfully. Qeron carries out reasonable due diligence on data suppliers but cannot guarantee the upstream compliance of all third-party sources.

## 7.3 International Transfers

Where personal data is transferred outside the EEA, Qeron ensures appropriate safeguards are in place, including Standard Contractual Clauses or reliance on an EU adequacy decision.

## 7.4 Legal Disclosures

We may disclose data where required by law, court order, or regulatory authority.

## 8. COOKIES

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- Essential cookies — strictly necessary for website functionality;
- Analytics cookies — to understand website usage (e.g., Google Analytics), set only with your consent.

Cookie preferences can be managed via our cookie banner or browser settings. Withdrawing consent does not affect prior lawful processing.

## 9. DATA RETENTION

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- Client engagement records: 7 years after end of engagement (legal/accounting compliance);
- Pipeline data processed on behalf of clients: retained per the applicable DPA;
- Marketing and prospecting data: 2 years from last meaningful interaction;
- Website analytics: 13 months (standard retention);
- Job applicant data: 12 months after end of recruitment process.

## 10. YOUR RIGHTS UNDER GDPR

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- Right of access (Art. 15) — to obtain a copy of personal data we hold about you;
- Right to rectification (Art. 16) — to correct inaccurate or incomplete data;
- Right to erasure (Art. 17) — to request deletion, subject to legal obligations;
- Right to restriction (Art. 18) — to limit processing in certain circumstances;
- Right to data portability (Art. 20) — to receive data in a machine-readable format;
- Right to object (Art. 21) — to object to processing based on legitimate interests or for direct marketing;

- Right to withdraw consent — at any time, without affecting prior lawful processing.

Submit requests to [privacy@qeron.com](mailto:privacy@qeron.com). We respond within one (1) month. You may also lodge a complaint with the AEPD (Agencia Española de Protección de Datos) at [www.aepd.es](http://www.aepd.es) or with the supervisory authority in your EU country of residence.

## 11. DATA SECURITY

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- Encryption of data in transit and at rest;
- Access controls and authentication requirements;
- Regular security assessments and staff training;
- Incident response procedures for data breaches.

In the event of a breach likely to result in risk to your rights and freedoms, we will notify the relevant supervisory authority within 72 hours and inform affected individuals as required by law.

## 12. CHANGES TO THIS POLICY

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We may update this Policy to reflect changes in our practices or applicable law. Material changes will be communicated by email or prominent website notice. The 'Effective date' at the top indicates the last revision.

## 13. CONTACT US

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Qeron

Email: [hello@qeron.ai](mailto:hello@qeron.ai)

Website: [www.qeron.ai](http://www.qeron.ai)