



WRITEBACK

Write-Back for Power BI (SaaS) Privacy Policy

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1. Introduction And Scope

1.1 Scope Of This Policy

This Privacy Policy ("**Policy**") explains how WRITEBACK, LDA. ("**Write-Back**", "**we**", "**us**" or "**our**") collects, uses, stores and discloses Personal Data in connection with Write-Back for Power BI (SaaS) (the "**Product**"), our Websites, marketing activities and interactions with current and prospective customers.

1.2 Applicable Legal Framework

Write-Back is committed to protecting the privacy and security of Personal Data. This Policy has been prepared taking into account Regulation (EU) 2016/679 (General Data Protection Regulation, "**GDPR**"), the Portuguese data protection framework under Law no. 58/2019, of 8 August, and applicable electronic communications rules under Law no. 41/2004, of 18 August.

1.3 Business Customers

The Product is intended for business customers. This Policy is directed at individuals who interact with Write-Back in a professional or business capacity, including account administrators, authorized users, billing contacts, support contacts and prospective customers.

1.4 Relationship With Other Documents

This Policy does not replace any product agreement, order form, data processing terms, cookie policy or other contractual terms that may apply to specific products, services or processing activities.

2. Definitions

Cookies	means small data files stored on a user's device or browser when accessing a website or digital service.
Controller	has the meaning given to it under the GDPR.
Customer Data	means all data, content, materials or information submitted, inputted, uploaded or transmitted by or on behalf of a customer or its authorized users through the Product, excluding Product Usage Data.
Customer Database	means the database or data repository controlled by the customer into which Customer Data submitted through the Product is stored.
Cloud Infrastructure	means the third-party cloud hosting, network, storage, computing and related infrastructure used to make the Product available.
GDPR	means Regulation (EU) 2016/679, General Data Protection Regulation, as amended, replaced or supplemented from time to time.
Personal Data	means any information relating to an identified or identifiable natural person, as defined in the GDPR.
Processing	means any operation or set of operations performed on Personal Data or sets of Personal Data, whether or not by automated means, including collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure, restriction, erasure or destruction.
Processor	has the meaning given to it under the GDPR.
Product Usage Data	means metadata and technical information relating to the configuration, access, subscription status, performance and use of the Product, including the type of action performed and the timing of such action, but excluding Customer Data.

Product	means Write-Back for Power BI, the software-as-a-service (SaaS) product made available to customers as a hosted service for use with Power BI.
Websites	means Write-Back websites under the domain writeback4analytics.com and any other website operated by Write-Back from time to time.

3. Data Controller and Contact Details

3.1 Data Controller

For the Processing activities described in this Policy where Write-Back determines the purposes and means of Processing, the data controller is:

WRITE-BACK, LDA

Edifício Ageas Tejo, Praça Príncipe Perfeito n.º 2, 3.º piso, 1990-278 Lisboa, Portugal

3.2 Contact Details

If you have any questions about this Policy or the Processing of your Personal Data, or if you wish to exercise any rights under the GDPR, you may contact Write-Back at data.protection@writeback4analytics.com.

4. Data Protection Principles

Write-Back processes Personal Data in accordance with the following principles:

- a)** Personal Data shall be processed lawfully, fairly and transparently;
- b)** Personal Data shall be collected for specified, explicit and legitimate purposes;
- c)** Personal Data shall be adequate, relevant and limited to what is necessary for the relevant Processing purposes;

- d)** Personal Data shall be accurate and, where necessary, kept up to date;
- e)** Personal Data shall be retained only for as long as necessary for the relevant purposes;
- f)** Personal Data shall be protected by appropriate technical and organizational measures;
- g)** access to Personal Data shall be limited to authorized persons, for authorized purposes and on a need-to-know basis.

5. Roles In Relation To Customer Data

5.1 Write-Back as Controller

Write-Back processes certain Personal Data as an independent controller, including account and contact data, billing data, marketing data, Website analytics, Product Usage Data and support interaction data. This Policy governs these controller activities.

5.2 Customer Data

Customer Data submitted, updated or written through the Product is stored in the Customer Database configured and controlled by the customer. The Product is not intended to operate as a storage, backup, retention, archiving or records management service, and Write-Back does not, as part of the standard functionality of the Product, host, store, back up, retain, restore or otherwise maintain Customer Data in Write-Back systems, except to the extent technically necessary to provide, support, secure or maintain the Product or as otherwise expressly agreed in writing.

5.3 Customer Responsibility And Exceptional Processing

Customers are responsible for determining whether Customer Data contains Personal Data, for informing the relevant data subjects, and for ensuring that Customer Data is processed lawfully.

If, exceptionally, Write-Back is required to process Personal Data on behalf of the customer, including in connection with authorized support, troubleshooting or remote assistance, the parties shall enter into appropriate written data processing terms to the extent required by applicable law. No data processing addendum or processor terms shall apply unless expressly agreed in writing by the parties.

6. Categories of Personal Data Collected

In its capacity as controller, Write-Back may collect and process the following categories of Personal Data:

- a)** Contact information: name, business email address, phone number, country and city;
- b)** Profile information: job title, company, role, department and other business information;
- c)** Billing information: tax identification number, VAT number, payment details and invoicing information;
- d)** Marketing information: newsletter preferences, event attendance, webinar registrations, survey responses and marketing preferences;
- e)** Website information: Cookies, IP address, URLs visited, browser information and related technical data;
- f)** Product Usage Data: metadata and technical information relating to configuration, subscription status, performance and use of the Product, excluding Customer Data;

- g)** Support interaction data: records of support requests, communications with Write-Back, screenshots, logs, error messages, configuration details, feedback and related correspondence;
- h)** Pictures or event media: photos or recordings collected in connection with events, webinars or testimonials, where applicable.

7. Controller Processing Activities, Purposes and Legal Bases

The table below identifies the main Processing activities carried out by Write-Back in its capacity as controller, the categories of Personal Data processed, the relevant purposes and the applicable legal basis under the GDPR.

Processing Activity	Categories of Personal Data	Purpose	Legal Basis (GDPR)
Website Access and Browsing	Cookies, IP address, URLs visited and related technical data	Provide website functionality, improve browsing experience and website security	Consent - Article 6 (1) (a) Legitimate interests - Article 6 (1) (f), depending on cookie type
Newsletter Subscription	Contact information	Send newsletters and marketing communications	Consent - Article 6 (1) (a)
Webinars and Events	Contact information, profile information and, where applicable, event pictures	Manage registration, attendance, communications and follow-up	Consent - Article 6 (1) (a) Legitimate interests - Article 6 (1) (f)

Sales and Customer Relationship Management	Contact information, profile information and software preferences	Respond to enquiries, explore opportunities and manage prospective or existing customer relationships	Contract performance and legitimate interests - Article 6 (1) (b) and Article 6 (1) (f)
Product Subscription	Contact, profile and billing information	Manage subscriptions, provide the Product, issue invoices and manage the contractual relationship	Contract performance - Article 6 (1) (b) Legal obligation - Article 6 (1) (c)
Support Requests	Contact information, support interaction data, screenshots, logs, error messages and configuration details provided by the customer	Provide support, troubleshoot issues and improve support processes	Contract performance and legitimate interests - Article 6 (1) (b) and Article 6 (1) (f)
Product Analytics and Improvement	Product Usage Data and software preferences	Monitor product usage, improve features, performance, security and user experience	Legitimate interests - Article 6 (1) (f)
Billing and Accounting	Billing information, tax identification number, VAT number, invoicing data and payment-related information	Process transactions, issue invoices and comply with accounting and tax obligations	Contract performance - Article 6(1) (b) Legal obligation - Article 6 (1) (c)

Legal and Compliance	Relevant contact, account, billing, usage or support information	Comply with legal obligations, enforce rights and respond to lawful requests	Legal obligation and legitimate interests – Article 6 (1) (c) and Article 6 (1) (f)
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8. Product Usage Data and Technical Information

8.1 Product Usage Data

In the Cloud, Write-Back may collect Product Usage Data generated by access to and use of the Product. Product Usage Data is used for billing, security, support, maintenance, product analytics, product improvement, reporting, detection of misuse and subscription and entitlement compliance. Product Usage Data does not include the content of Customer Data.

8.2 No Customer Data Content

Product Usage Data does not include the content of Customer Data. Write-Back uses Product Usage Data only for the purposes described in this Policy and the applicable product agreement.

9. Cookies And Similar Technologies

Write-Back may use Cookies and similar technologies on its Websites and digital services to provide website functionality, improve browsing experience, measure performance, support security and, where applicable, support marketing activities.

Where required by applicable law, Write-Back will request consent before placing non-essential Cookies. Further information about Cookies may be made available in Write-Back's cookie policy or cookie banner.

10. Information Sharing and Recipients

10.1 Categories Of Recipients

Write-Back may share Personal Data with the following categories of recipients, solely to the extent necessary for the purposes described in this Policy:

Category Of Recipient	Examples / Purpose
Hosting and infrastructure providers	Providers supporting Write-Back websites, account systems, support tools and Cloud Infrastructure used to make the Product available.
Payment processors and billing providers	Providers used to process payments, manage invoicing and accounting.
Analytics and product monitoring tools	Tools used to monitor website and product usage, performance and security.
Customer support tools and platforms	Platforms used to manage support tickets, customer communications and troubleshooting.
Professional advisers	Legal counsel, auditors, accountants and other advisers acting under professional obligations.
Public authorities and courts	Where disclosure is required by law, regulation, court order or lawful request.

10.2 No Sale of Personal Data

Write-Back does not sell Personal Data. Write-Back may disclose Personal Data where required to do so by law, regulation, court order or lawful request. Where

legally permitted, Write-Back will provide notice to the affected data subject before making such disclosure.

10.3 Third-Party Websites and Social Media Features

Write-Back Websites may include links to third-party websites or social media features. These third-party services are governed by their own privacy policies, and Write-Back is not responsible for their privacy practices.

10.4 Testimonials

Where Write-Back displays testimonials or customer references involving Personal Data, it will do so on the basis of consent or another lawful basis under the GDPR, as applicable.

11. International Transfers

Personal Data may be processed in countries outside the European Economic Area where Write-Back, its providers or its customers operate. Where required by the GDPR, Write-Back will implement appropriate safeguards, such as adequacy decisions, standard contractual clauses or another lawful transfer mechanism.

Where Cloud Infrastructure or service providers are located outside the European Economic Area, Write-Back will implement appropriate transfer mechanisms required under the GDPR.

12. Data Retention

Write-Back retains Personal Data only for as long as necessary for the purposes for which it was collected, including to provide the Product, manage customer relationships, comply with legal, tax and accounting obligations, resolve disputes, enforce agreements and maintain security.

Retention periods may vary depending on the category of Personal Data and the applicable legal basis. Where Personal Data is no longer required, Write-Back will delete, anonymize or otherwise securely dispose of it, unless retention is required by law or justified by legitimate legal, security or compliance purposes.

13. Security

Write-Back implements appropriate technical and organizational measures designed to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access and other unlawful Processing.

Such measures may include, where appropriate, encryption, access controls, authentication measures, backup procedures, logging, monitoring, confidentiality obligations, security reviews and regular testing or assessment of security controls.

Where Write-Back relies on third-party Cloud Infrastructure to make the Product available, Write-Back adopts commercially reasonable measures designed to protect the Personal Data processed by Write-Back in connection with that infrastructure.

14. Personal Data of Minors

The Product and Write-Back's services are not directed to minors. Write-Back does not knowingly collect Personal Data from minors. If Write-Back becomes aware that it has inadvertently collected Personal Data from a minor, it will take prompt steps to delete such data.

15. Data Subject Rights

Subject to the conditions set out in the GDPR, data subjects may have the right to request access to their Personal Data, rectification of inaccurate Personal Data, erasure, restriction of Processing, portability, objection to Processing and withdrawal of consent where Processing is based on consent.

Requests to exercise rights may be submitted to data.protection@writeback4analytics.com. Write-Back may need to verify the identity of the requester before responding. Data subjects also have the right to lodge a complaint with the competent supervisory authority, including the Comissão Nacional de Proteção de Dados in Portugal.

16. Marketing Communications

Where permitted by law, Write-Back may send marketing communications about its products, services, events or content. Recipients may opt out of marketing communications at any time by using the unsubscribe mechanism included in the communication or by contacting Write-Back.

17. Changes to This Policy

Write-Back reserves the right to update or modify this Policy from time to time to reflect changes in our practices, the Product, or applicable law.

Where Write-Back makes material changes to this Policy, it will provide at least 30 days' advance notice via email to the account contact address on file or by prominent notice on our Website. Continued use of the Product or our services after such notification constitutes acknowledgment of the updated Policy.

18. Contacts

For questions about this Policy, the Processing of Personal Data or the exercise of data protection rights, please contact Write-Back at data.protection@writeback4analytics.com.