

## PLAYGAIN OY – NOVOGAIN AI PRIVACY NOTICE

**Version:** 1.0 | **Effective:** 1 June 2025 | **Last updated:** 3 June 2025

### 1. Who Is Responsible for Your Data?

Entity	Role	Purpose	Contact
<b>Your Employer or Organisation (the “Customer”)</b>	Data Controller	Runs Novogain AI surveys and receives reports. Controls your survey responses and account data.	Contact your HR or privacy team.
<b>Playgain Oy Business</b> <b>ID 2679570-2,</b> <b>Rantakukantie 1 B</b> <b>9, 90540 Oulu,</b> <b>Finland</b>	<b>Data Processor</b> (for surveys) and <b>Independent Controller</b> (for website analytics, support, and product telemetry)	Hosts the Novogain AI platform and processes data under Customer instruction. Separately collects data to improve service and support.	<a href="mailto:privacy@novogain.ai">privacy@novogain.ai</a>

Playgain acts as a processor for employer-submitted data and as a controller for data it collects directly (support logs, marketing, telemetry).

## 2. What Data We Collect & Why

Category	Examples	Purpose	Legal Basis (GDPR)
<b>Account Data</b>	Name, work email, role, team	Create and secure your account	Art. 6(1)(b) – contract
<b>Survey Responses</b>	Ratings, free-text feedback	Generate QWL index and reports	Art. 6(1)(b) – employer contract Art. 9(2)(b) – employment context Art. 9(2)(a) – explicit consent (survey disclaimer)
<b>Usage Logs</b>	IP address, browser, timestamps	Platform security, analytics	Art. 6(1)(f) – legitimate interest
<b>Support Data</b>	Messages, screenshots	Help resolve issues	Art. 6(1)(b) – contract
<b>Website Cookies</b>	GA4 IDs, page views	Analytics, marketing	Art. 6(1)(a) – consent via banner
<b>Marketing Opt-in</b>	Email address	Send newsletters, updates	Art. 6(1)(a) – double opt-in consent

Please avoid submitting special categories of data unless necessary and permitted. Free-text fields should not contain health, union, or similarly sensitive personal information unless explicitly requested.

## 3. Profiling & Automated Suggestions

Novogain AI uses machine learning to suggest HR-related actions based on aggregated data. These suggestions support—not replace—human decision-making. You will **not** be subject to decisions that produce legal or similarly significant effects without meaningful human involvement.

## 4. Sub-Processors & Data Sharing

We work with vetted service providers who process data only under our instructions:

Provider	Purpose	Location
<b>DigitalOcean LLC</b>	Primary hosting, DB, object storage	Frankfurt (FRA-1), Amsterdam (AMS-3)
<b>Mailgun Technologies Inc</b>	Transactional email	EU
<b>Sentry Inc.</b>	Error monitoring (pseudonymised IDs)	EU
<b>SendGrid Inc.</b>	Transactional Email	US
<b>OpenAI OpCo, LLC</b>	Generative AI Action plans	US (US-East / EU-West, SCCs)
<b>Google Ireland Ltd.</b>	Website analytics (GA4)	EU datacenters

- A live list is maintained in this document, check [Novogain.ai](https://novogain.ai) for the latest document
- We give **30 days' notice** before adding new sub-processors.
- All vendors are bound by data processing agreements and reviewed for security and compliance.

We never sell or rent your personal data.

## 5. International Transfers

All Novogain AI application data is stored within the **European Economic Area (EEA)**. If we ever need to transfer data outside the EEA (e.g., U.S.-based support), we will:

- Use EU Standard Contractual Clauses (SCCs) or equivalent
- Conduct risk assessments and add **supplementary safeguards**
- Apply UK or Swiss Addenda where required

## 6. How Long We Keep Data

Data Type	Retention
<b>Account &amp; Survey Data</b>	Duration of customer contract + 30 days (export window), then deleted
<b>Usage Logs</b>	90 days
<b>Backups</b>	30 days (encrypted rolling)
<b>Support Tickets</b>	2 years
<b>Google Analytics</b>	14 months (aggregated)
<b>Marketing Emails</b>	Until you unsubscribe

Backups may retain deleted data temporarily for up to 30 days.

## 7. Your Rights

Under GDPR and applicable laws, you have the right to:

- Access your personal data
- Correct inaccuracies
- Request deletion (when based on consent or no longer needed)
- Restrict or object to processing (when based on legitimate interest)
- Receive your data in portable format (CSV/JSON)
- Withdraw consent (cookies, marketing)

To exercise your rights:

- For survey or account data, please first contact your employer's HR team.
- For **support, telemetry, or website data**, contact Playgain directly at [privacy@novogain.ai](mailto:privacy@novogain.ai).

If unresolved, you can file a complaint with the **Finnish Data Protection Ombudsman** at [tietosuoja.fi](https://tietosuoja.fi) or your local authority.

## 8. Security Measures

We take data protection seriously:

- TLS 1.3 encryption in transit; AES-256 at rest
- Multi-factor authentication & role-based access
- 24/7 monitoring and incident detection
- Annual penetration tests
- ISO/IEC 27001-aligned security program
- SOC 2 Type II audit **targeted Q4 2025**

## 9. Cookies & Similar Technologies

Type	Purpose	Opt-in Required?
<b>Essential</b>	Login, CSRF, session management	No - always on
<b>Analytics (GA4)</b>	Understand traffic, optimize UX	Yes - via cookie banner
<b>Marketing</b>	Send updates if you opt in	Yes - double opt-in

Manage your settings via:

- The **Cookie Banner** (“Cookie Settings”)
- Your browser
- Global Privacy Control (GPC) signal (if supported)

## 10.Changes to This Notice

We may update this notice periodically.

If changes are material, we will notify you via:

- In-app messages
- Website updates (30 days in advance)

Archived versions will be made available for reference

## 11. Contact Us

For questions, concerns, or data rights requests:

**Email:** [privacy@novogain.ai](mailto:privacy@novogain.ai)

**Post:** **Playgain Oy - Data Protection**

Rantakukantie 1 B 9  
90540 Oulu, Finland

Thank you for trusting Novogain AI with your data.