

# Privacy Policy

Last updated: July 8, 2026

This Privacy Policy explains how Truebees s.r.l. ("Truebees", "we", "us", "our") processes personal data when you use our website and services.

## 1. Data Controller

Controller: **Truebees s.r.l.**  
Address: Via del Travai 46, 38122 Trento (Italy)  
Email for privacy requests: [privacy@truebees.eu](mailto:privacy@truebees.eu)

## 2. Scope

This policy applies to personal data processed through:

- the website `truebees.eu` ;
- contact and support channels;
- subscription and billing workflows for our services;
- newsletter communications.

## 3. Personal Data We Process

| Context                             | Categories of data                                                                                                                                        | Purposes                                                                                                  | Legal basis (GDPR art. 6)                                                                        |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|
| Website browsing and analytics      | IP address, browser and device data, operating system, visited pages, access timestamps, referrer URLs, basic usage logs, cookies, usage and session data | Website operation, security, diagnostics, aggregate usage statistics and service improvement              | Art. 6(1)(f) legitimate interests (secure and functional website)                                |
| Contact requests                    | Name, surname, email, company, request content                                                                                                            | Responding to requests and pre-sales/support activities                                                   | Art. 6(1)(b) pre-contractual measures / contract performance                                     |
| Account and subscription management | Name, surname, email, account credentials, company details, billing details, subscription status, invoices and transaction metadata                       | Account creation, service delivery, subscription lifecycle (activation, renewal, cancellation), invoicing | Art. 6(1)(b) contract performance; Art. 6(1)(c) legal obligations (accounting/tax)               |
| Payments                            | Payment instrument metadata/tokens, transaction identifiers, billing address (full card details are handled by payment providers)                         | Payment processing, fraud prevention, accounting                                                          | Art. 6(1)(b) contract performance; Art. 6(1)(c) legal obligations; Art. 6(1)(f) fraud prevention |

|                                     |                                                                                                                    |                                                                                    |                                                                                                                      |
|-------------------------------------|--------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| Newsletter                          | Name, surname, email, subscription preferences, consent logs                                                       | Sending marketing/newsletter communications                                        | Art. 6(1)(a) consent                                                                                                 |
| Abuse prevention (Google reCAPTCHA) | IP address, browser/device information, interaction signals, and cookies used by reCAPTCHA (including _GRECAPTCHA) | Distinguishing legitimate users from bots and protecting forms/services from abuse | Art. 6(1)(f) legitimate interests (security and abuse prevention); where required by local law, Art. 6(1)(a) consent |

## 4. Data Processors and Recipients

We use trusted third-party processors under GDPR-compliant agreements (including data processing agreements where required). Main processors include:

- **Chargebee:** subscription and billing management.
- **Stripe:** payment processing.
- **Google (Analytics):** aggregate website usage measurement and reporting.
- **Google (reCAPTCHA):** bot and abuse prevention on forms and service endpoints.
- **Microsoft (Microsoft Azure):** cloud hosting and infrastructure for our platform and databases, provided from Microsoft's North Europe region (Ireland, within the EEA); and email delivery (Azure Communication Services / Azure Email Communication Service) for transactional, service, and newsletter communications.
- **Hetzner:** object storage for database backups, hosted in Helsinki (Finland, within the EEA).
- Other technical providers where necessary (for example IT support), acting under instructions from Truebees.

Personal data may also be disclosed to competent public authorities when required by law.

## 5. International Data Transfers

Our platform, databases, and database backups are hosted within the European Economic Area (EEA), using Microsoft Azure (North Europe region, Ireland) for hosting and Hetzner (Helsinki, Finland) for backup storage.

Some processors may nevertheless process personal data outside the EEA (for example certain analytics, payment, or anti-abuse providers). When this occurs, we use a valid transfer mechanism under GDPR, such as:

- an adequacy decision by the European Commission; or
- the European Commission Standard Contractual Clauses (SCCs), with supplementary measures where required.

You may request additional information on transfer safeguards by contacting us at [privacy@truebees.eu](mailto:privacy@truebees.eu).

## 6. Retention Periods

We retain personal data only for as long as necessary for the purposes described above and to meet legal obligations. In particular:

- contract/subscription and billing records: up to 10 years where required by accounting/tax laws;
- contact requests: up to 24 months after closure of the request;

- newsletter data: until consent withdrawal (plus limited suppression data to respect opt-out requests);
- technical/security logs: for a limited period proportionate to security and diagnostic needs.

When retention is no longer necessary, data is deleted or anonymized.

## 7. Data Subject Rights

Under GDPR, you can request:

- access to your personal data (Art. 15);
- rectification of inaccurate data (Art. 16);
- erasure in applicable cases (Art. 17);
- restriction of processing (Art. 18);
- data portability (Art. 20);
- objection to processing based on legitimate interest (Art. 21);
- withdrawal of consent at any time (without affecting lawfulness before withdrawal);
- not to be subject to decisions based solely on automated processing, where applicable (Art. 22).

You also have the right to lodge a complaint with your local supervisory authority (Art. 77 GDPR).

To exercise your rights, contact: [privacy@truebees.eu](mailto:privacy@truebees.eu).

## 8. Mandatory vs Optional Data

Where data is required to enter into or perform a contract (for example account, subscription, billing data), failure to provide it may prevent us from delivering the requested service. Data provided for marketing/newsletter is optional and based on consent.

## 9. Cookies and Similar Technologies

We use cookies and similar technologies as described in our Cookie Policy.

If Google reCAPTCHA is enabled on a page or service, Google may set cookies and process related technical data to provide anti-abuse protection.

## 10. Changes to This Policy

We may update this Privacy Policy from time to time. Material changes will be communicated through appropriate channels (for example website notice or direct communication where feasible).