

EXTERNAL DOCUMENT

MugAln Group ApS (CVR46218701)

PRIVACY NOTICE

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APPROVED

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Privacy Notice

1. Introduction

MugAln Group ApS ("**MugAln**", "**we**", "**our**", "**us**") is committed to protecting personal data and respecting privacy rights.

This Privacy Notice explains how MugAln processes personal data when acting as a **data controller** under applicable data protection laws, including Regulation (EU) 2016/679 ("GDPR").

This Privacy Notice applies to: Visitors to our website; Individuals contacting us; Prospective customers and business contacts; Customer representatives and authorised users; Suppliers, partners, consultants and advisors; Users of our support services; Individuals attending meetings, webinars or events; and Job applicants.

This Privacy Notice does **not** primarily govern personal data processed by our customers within their own MugAln environments where MugAln acts solely as a **data processor**. Further information regarding this distinction is provided in Section 3.

2. Who we are

MugAln Group ApS (CVR: 46218701)

Vestre Teglgade 15; 2450 København SV; Denmark

Email: info@mugaingroup.com

Website: www.mugaingroup.com

Where required by law, MugAln may designate a Data Protection Officer ("DPO") or other privacy contact person. Current contact details will be made available on our website.

For privacy-related questions or requests concerning your personal data, please contact us using the details above.

3. Our roles under GDPR

3.1 When MugAln Acts as Controller

MugAln acts as a **controller** when we determine the purposes and means of processing personal data for our own business purposes, including operating our website; handling enquiries and contact requests; managing sales and marketing activities; administering customer accounts and subscriptions; managing supplier and partner relationships; handling support communications; maintaining platform security; recruiting personnel; and complying with legal, contractual and regulatory obligations.

3.2 When MugAln Acts as Processor

When customers use the MugAln platform to process their own information, documents, prompts, outputs, communications, or other personal data, the customer generally acts as the **controller** and MugAln acts as the **processor**.

In such circumstances:

- MugAln processes personal data solely on documented customer instructions;
- processing is governed by the applicable Data Processing Agreement ("DPA");
- the customer determines the lawful basis and purposes for processing;
- the customer is responsible for providing any required privacy information to its users, employees, customers or other individuals.

3.3 Customer Tenant Data

This Privacy Notice does not describe every processing activity performed by our customers within their own MugAln environments.

Individuals seeking information regarding customer-controlled data should contact the relevant customer directly.

Unless expressly agreed in writing, MugAln does not use customer tenant data for: marketing purposes; unrelated product development; training general-purpose AI models; fine-tuning general-purpose AI models; benchmarking AI models; nor validating AI models for unrelated purposes.

4. Summary of processing activities

MugAln may process personal data for the following purposes:

Activity	Typical Data Subjects
Website operation	Website visitors
Contact management	Enquirers and prospects
Sales and marketing	Prospective customers
CRM administration	Business contacts
Customer account management	Customer representatives and users
Service and support	Customer users and contacts
Security monitoring	Platform users
Supplier management	Supplier contacts
Partner management	Business partners
Event administration	Participants
Recruitment	Job applicants
Compliance and legal matters	Relevant individuals

5. Personal data we collect directly from you

Depending on the circumstances, we may collect:

Identity Information

- Name; Professional title; Employer or organisation

Contact Information

- Business email address; Telephone number; Postal address

Account Information

- Usernames; Login identifiers; Subscription information

Communications

- Correspondence; Meeting notes; Support requests; Feedback

Technical Information

- IP address; Device information; Browser information; Session identifiers; Access logs

Recruitment Information

- CVs; Applications; Qualifications; Employment history

We collect personal data only where reasonably necessary for identified business purposes.

6. Personal data received from other sources

We may receive personal data from: customers; business partners; publicly available professional sources; company websites; industry directories; professional networking platforms; recruiters and recruitment agencies; referrals and introductions.

The data may include business contact details; professional roles; organisational affiliations; publicly available professional information.

7. Purposes and legal bases

We process personal data only where a lawful basis exists.

Purpose	Typical Legal Basis
Responding to enquiries	Legitimate interests; pre-contractual measures
Providing services	Performance of contract
Customer administration	Performance of contract
Account management	Performance of contract
Support services	Performance of contract; legitimate interests
Security and fraud prevention	Legitimate interests; legal obligation
Supplier administration	Performance of contract

Purpose	Typical Legal Basis
Recruitment	Pre-contractual measures; legitimate interests
Regulatory compliance	Legal obligation
Legal claims and defence	Legitimate interests
Marketing communications	Consent and/or legitimate interests as permitted by applicable law

Legitimate Interests

Where processing is based on legitimate interests, these may include operating and improving our business; securing our systems and services; managing customer relationships; preventing fraud and abuse; protecting legal rights and interests; and conducting ordinary B2B business activities.

8. Cookies and similar technologies

Our website may use cookies and similar technologies for: website functionality; security; performance monitoring; analytics; or user preferences.

Where required by law, cookies requiring consent will only be deployed after valid consent has been obtained.

Additional information may be provided in a separate Cookie Notice.

9. AI platform specific processing

Controller Processing by MugAI

MugAI may process personal data as controller for: account administration; subscription management; platform security; support administration; operational monitoring; and service improvement based on non-customer-controlled information.

Processor Processing for Customers

Where customer data is processed within customer environments, MugAI acts as processor. Such processing is governed by customer instructions; applicable agreements; and/or the applicable DPA.

AI Training Restrictions

Unless expressly authorised in writing: customer-controlled personal data is not used to train general-purpose AI models; and customer-controlled personal data is not used for unrelated AI development activities.

10. Security logs, diagnostics and telemetry

To maintain service security and reliability, MugAIIn may collect: authentication logs; access records; activity logs; system events; operational telemetry; and/or security alerts.

Such processing is carried out to protect systems and data; identify misuse or security incidents; troubleshoot service issues; maintain system integrity; meet legal and contractual requirements.

Access to such information is restricted to authorised personnel with a defined business need.

11. Who we share our data with

We may disclose personal data to cloud hosting providers; software and infrastructure providers; professional advisers; auditors; insurers; recruitment providers; payment providers; regulatory authorities; law enforcement authorities where legally required.

We require relevant service providers to maintain appropriate confidentiality and security measures.

We do not sell personal data.

12. International data transfers

Where personal data is transferred outside the European Economic Area ("EEA"), MugAIIn will implement appropriate safeguards, which may include adequacy decisions; Standard Contractual Clauses; other legally recognised transfer mechanisms.

Information regarding transfer safeguards may be requested using the contact details provided in this Privacy Notice.

13. Retention schedule

MugAI retains personal data only for as long as necessary to fulfil the purposes described in this Privacy Notice, comply with legal obligations, establish or defend legal claims, and meet contractual requirements.

The following retention periods are generally applied unless a longer retention period is required by law or justified by documented business needs.

Processing Activity	Data Categories	Typical Retention Period
Website analytics	IP address, device information, website usage data	Up to 26 months
Website enquiry forms	Contact details, enquiry content	24 months from last interaction
Sales and prospect management	Business contact information, meeting records, CRM records	36 months from last meaningful interaction
Marketing communications	Contact details, subscription preferences	Until unsubscribe plus 24 months
Customer account administration	Customer user and administrator information	Contract term plus 7 years
Customer contract records	Commercial records, invoices, agreements	7 years after termination
Support requests	Support communications, service requests, troubleshooting records	5 years after closure
Security logs	Authentication logs, access records, security events	12 months unless required longer for investigation or compliance
Supplier and partner management	Contract and contact information	Contract term plus 7 years

Processing Activity	Data Categories	Typical Retention Period
Recruitment files (unsuccessful applicants)	Application materials, interview notes	6 months unless consent obtained for longer retention
Recruitment files (talent pool)	Application materials	Up to 24 months with consent
Employee records	As specified in Employee Privacy Notice	See Employee Privacy Notice
Legal and compliance matters	Relevant records and evidence	Until matter resolved plus applicable limitation period

Where possible, data may be anonymised instead of deleted and retained for statistical, security, operational, or service improvement purposes.

14. Your rights

Subject to applicable law, you may have the right to: access your personal data; obtain rectification of inaccurate data; request erasure of personal data; request restriction of processing; object to processing; receive portable copies of relevant data; and/or withdraw consent where processing relies upon consent.

Requests may be submitted using the contact details provided in this Privacy Notice.

We may need to verify identity before responding to requests.

15. Automated decision making and profiling

MugAln does not ordinarily make decisions producing legal or similarly significant effects based solely on automated processing within the meaning of Article 22 GDPR.

If this changes, affected individuals will be informed as required by applicable law.

16. Complaints and contact details

Questions about this Privacy Notice or our processing of personal data may be directed to:

MugAln Group ApS

Email: info@mugaingroup.com

Individuals also have the right to lodge a complaint with the competent supervisory authority.

For Denmark, complaints may generally be directed to:

Datatilsynet; Carl Jacobsens Vej 35; 2500 Valby; Denmark

17. Changes to this privacy notice

We may update this Privacy Notice from time to time to reflect legal developments; business changes; service changes; and/or regulatory guidance.

The latest version will be published on our website.

18. Customer tenant data

Where a MugAln customer uses the MugAln platform to process personal data, that customer typically acts as the controller.

In such cases:

- MugAln processes personal data only on documented customer instructions;
- processing is governed by the applicable DPA;
- the customer determines lawful basis and purpose;
- the customer is responsible for providing privacy information to affected individuals;
- data subject requests relating to customer-controlled data should normally be directed to the relevant customer.

MugAln will provide reasonable assistance to customers in accordance with applicable agreements and data protection law.

APPENDIX A: Article 13 / Article 14 processing activities matrix

A.1 Website Visitors

Item	Description
Purpose	Website operation, security, analytics
Categories of Data	IP address, device data, browsing information
Legal Basis	Legitimate interests; consent where required
Recipients	Hosting providers, analytics providers
International Transfers	Where applicable under approved transfer mechanisms
Retention	Up to 26 months

A.2 Contact Forms and Enquiries

Item	Description
Purpose	Responding to requests and business enquiries
Categories of Data	Name, organisation, role, email, telephone number, message content
Legal Basis	Legitimate interests; pre-contractual measures
Recipients	Internal personnel and support providers
International Transfers	As applicable
Retention	24 months

A.3 Prospects and CRM Management

Item	Description
Purpose	Business development and relationship management
Categories of Data	Contact details, employer, role, meeting information
Legal Basis	Legitimate interests
Source	Individual, referrals, business directories, public professional sources
Recipients	CRM providers, internal personnel
International Transfers	As applicable
Retention	36 months from last interaction

A.4 Customer Account Administration

Item	Description
Purpose	Subscription and account management
Categories of Data	User account information, business contact details
Legal Basis	Contractual necessity
Recipients	Internal teams and service providers
International Transfers	As applicable
Retention	Subscription term plus 7 years where applicable

A.5 Support and Customer Service

Item	Description
Purpose	Troubleshooting, maintenance and support
Categories of Data	Support requests, communication records, technical information
Legal Basis	Contractual necessity; legitimate interests
Recipients	Internal support personnel and service providers
International Transfers	As applicable
Retention	5 years

A.6 Security and Platform Monitoring

Item	Description
Purpose	Security, fraud prevention, incident response
Categories of Data	Authentication logs, system events, IP addresses
Legal Basis	Legitimate interests; legal obligations
Recipients	Security providers, regulators where required
International Transfers	As applicable
Retention	12 months unless extended for investigations

A.7 Suppliers and Business Partners

Item	Description
Purpose	Contract management and business operations
Categories of Data	Contact details, contractual records
Legal Basis	Contractual necessity; legitimate interests
Recipients	Finance, legal and operational service providers
International Transfers	As applicable
Retention	Contract term plus 7 years

APPENDIX B: Cookie notice

1. Purpose

MugAln uses cookies and similar technologies to ensure website functionality, maintain security, analyse website performance and improve user experience.

2. Types of Cookies

Strictly Necessary Cookies

Required for: website operation; authentication; session management; security controls.

These cookies do not require consent where permitted by applicable law.

Analytics Cookies

Used to: understand website usage; identify performance improvements; generate aggregate statistics.

Consent will be obtained where required.

Preference Cookies

Used to: remember language preferences; remember user settings.

Consent will be obtained where required.

Marketing Cookies

If used, these allow measurement of campaign effectiveness and marketing effectiveness.

Consent will be obtained before such cookies are deployed.

3. Cookie Controls

Users may manage cookie preferences through the cookie management mechanism provided on the website.

APPENDIX C: Recruitment privacy notice

Purpose

This Recruitment Privacy Notice applies to job applicants, candidates and referees.

Categories of Data

MugAln may process contact details; CVs and résumés; education history; employment history; qualifications; interview notes; references; and assessment results.

Legal Bases

Processing may be necessary for: taking steps prior to entering employment; legitimate recruitment interests; compliance with employment law obligations; consent where required.

Recipients

Information may be shared with hiring managers; interview panel participants; external recruiters; background verification providers where applicable.

Retention

Unsuccessful applicants: 6 months following recruitment completion.

Talent pool candidates: up to 24 months where consent has been provided.

Successful applicants: information transferred to employment records as necessary.

APPENDIX D: Employee privacy notice (Internal document)

The Employee Privacy Notice is maintained as a separate controlled internal document.

This Employee privacy notice is not published publicly.

APPENDIX E: Subprocessor list (separate public document)

MugAln maintains an up-to-date list of approved subprocessors used for service delivery. The current Subprocessor List is available on our website and includes the name of each subprocessor, the service provided, processing purpose and processing location.

APPENDIX F: AI processing and governance statement

1. Purpose

This AI Processing and Governance Statement explains how MugAIIn governs AI-assisted processing within the MugAIIn platform and clarifies the respective responsibilities of MugAIIn and its customers.

This Appendix supplements the Privacy Notice, Terms of Service, Master Subscription Agreement ("MSA"), and Data Processing Agreement ("DPA").

2. Controller and Processor Roles

Customer-Controlled Processing

Where a customer uses the MugAIIn platform to process information, documents, prompts, outputs, communications or other content within its own MugAIIn environment, the customer generally acts as the Data Controller and MugAIIn acts as the Data Processor.

In such circumstances the customer determines the purposes and lawful basis of processing; the customer decides which personal data is processed; the customer is responsible for transparency obligations towards data subjects; and MugAIIn processes data only on documented customer instructions and in accordance with the applicable DPA.

MugAIIn-Controlled Processing

MugAIIn acts as a Controller for limited operational activities necessary to operate and secure the platform, including customer account administration; subscription management; billing administration; support administration; platform security monitoring; fraud detection and prevention; platform telemetry used to maintain service security, reliability and performance; and legal and regulatory compliance.

3. Customer Content

Customer Content may include prompts; AI outputs; uploaded files; communications; structured and unstructured information; customer user information; and/or business records.

Except where expressly agreed in writing, Customer Content remains under the control of the relevant customer.

4. AI Model Training Restrictions

Unless expressly authorised in writing by the relevant customer MugAI does not use Customer Content, personal data contained within Customer Content, prompts, outputs or customer tenant information for training general-purpose AI models; fine-tuning foundation models; benchmarking AI models; validating AI models for unrelated purposes; marketing activities; product development unrelated to delivery of contracted services.

5. Human Oversight

MugAI is designed to support human decision-making and business processes.

Customers remain responsible for reviewing AI-generated outputs; verifying accuracy, completeness and suitability; applying human judgement before relying on AI-generated outputs; ensuring compliance with applicable laws and regulations.

6. Logging and Auditability

To support governance, security and compliance, MugAI may maintain authentication logs; access records; activity records; operational telemetry; security events; audit trails where enabled.

Such information is processed only for legitimate operational, security and compliance purposes.

7. Security Controls

MugAI implements technical and organisational measures designed to support confidentiality; integrity; availability; resilience; accountability. Measures may include role-based access controls; least-privilege principles; encryption in transit; logging and monitoring; backup procedures; and/or incident response processes.

8. AI Governance Principles

MugAI seeks to operate AI capabilities according to the following principles: lawfulness; transparency; accountability; human oversight; security by design; privacy by design; data minimisation; and customer control.



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CEO & co-founder

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