
Privacy Policy

BranchKey B.V.

1. Who we are

BranchKey B.V. is the controller of your personal data. We are registered in the trade register of the Chamber of Commerce under number 83138161. Our registered office is at Keizersgracht 241, 1016EA Amsterdam, the Netherlands.

For questions about this privacy policy or the processing of your personal data, contact us at: privacy@branchkey.com

2. What personal data we process

We process the minimum personal data necessary to provide our services. Providing account and billing data is necessary to enter into and perform the agreement between you and BranchKey for use of our services, as defined in our General Terms and Conditions or other applicable commercial agreement (the "Agreement"). Without this data, we cannot provide our services. The categories of data, purposes, legal bases, and retention periods are set out below.

2.1 Account data

Data	Name, email address, telephone number, employer/company name
Purpose	To create and manage your account, provide access to the Software, and communicate with you about the Agreement
Legal basis	Performance of the Agreement (Art. 6(1)(b) GDPR)
Retention	Until you delete your account. At your request, we will provide a copy of your data at the end of the Agreement

2.2 Technical data

Data	IP address, API activity logs, operating system and browser information
Purpose	To ensure the security and proper functioning of the Software, to troubleshoot issues, and to detect abuse
Legal basis	Legitimate interest in secure and functioning operation of our systems (Art. 6(1)(f) GDPR)
Retention	Logs are retained for a limited period necessary for operational purposes and automatically overwritten on a rolling basis

2.3 Billing data

Data	Company name, address, VAT identification number, payment details
Purpose	To process payments, issue invoices, and comply with tax obligations
Legal basis	Performance of the Agreement (Art. 6(1)(b) GDPR) and compliance with Dutch tax law (Art. 6(1)(c) GDPR)
Retention	Invoice data is retained for 7 years in accordance with Dutch tax and customs administration requirements. Payment details are deleted when your account is closed

2.4 Website analytics

Data	Page views, referring pages, browser and device type, country. No cookies are used
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Purpose	To understand how our website is used and to improve it
Legal basis	Legitimate interest in analysing and improving our services (Art. 6(1)(f) GDPR)
Retention	Aggregated analytics data only. No individual visitor profiles are created

2.5 Marketing communications

Data	Email address
Purpose	To send you news and information about our services, only if you have opted in
Legal basis	Your consent (Art. 6(1)(a) GDPR)
Retention	Until you unsubscribe or withdraw your consent

3. What we do not process

BranchKey provides a federated machine learning platform. By design, customer data and end-user data remain at the customer's own infrastructure. We do not process, store, or have access to any customer datasets or training data. Only model weights and parameters are exchanged through our platform.

Where customers deploy the BranchKey platform on their own infrastructure, we do not act as a processor for any data handled by that deployment. The customer is solely responsible for the processing of data on their own systems. This privacy policy applies only to data processed by BranchKey directly, as described in section 2.

If you provide us with logs, diagnostic data, or other information for support or service improvement purposes, this data may contain personal data. By sending this data to us, you are responsible for ensuring it is shared in accordance with applicable data protection laws. We will process it only for the stated purpose and delete it once the support case is resolved or the improvement is completed.

We do not use automated decision-making or profiling.

4. Who receives your data

We do not sell your personal data. We share your data only with processors who act on our instructions and are bound by data processing agreements. Your data is not shared with any other third parties unless required by law.

Our processors:

Processor	Service	Location	Data transferred
Hetzner Online GmbH	Server infrastructure (for BranchKey-hosted deployments)	Germany (EU)	Account data, technical data, billing data
Cloudflare, Inc.	DNS, marketing website hosting (Pages), and website analytics	USA (EU SCCs in place)	IP addresses, page view data
Mailjet (Sinch Group)	Transactional and marketing email delivery	EU (Germany/Belgium)	Email address, name

All processing by Hetzner takes place exclusively within the European Union. The BranchKey application is hosted on Hetzner infrastructure and is not served through Cloudflare. Cloudflare is used only for DNS resolution and the marketing website (branchkey.com). Processing by Cloudflare is governed by their Data Processing Addendum, which includes EU Standard Contractual Clauses for transfers to the United States.

5. Your rights

Under the GDPR, you have the following rights regarding your personal data:

Access – You can request to view the personal data we hold about you.

Rectification – You can request correction of inaccurate or incomplete data.

Erasure – You can request deletion of your data, subject to legal retention obligations.

Restriction – You can request that we restrict the processing of your data.

Data portability – You can request your data in a structured, commonly used, machine-readable format.

Objection – You can object to processing based on legitimate interest.

Withdrawal of consent – Where processing is based on consent, you can withdraw it at any time. This does not affect the lawfulness of processing before withdrawal.

To exercise any of these rights, send a request to privacy@branchkey.com. We will respond within 30 days. If we cannot comply with your request, we will inform you of the reasons.

6. Data security

We take appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, or destruction. These measures include encryption of data in transit (TLS 1.2+), access controls, and regular security reviews. Our infrastructure provider Hetzner maintains ISO 27001 certification and undergoes annual audits by TÜV Rheinland.

7. Cookies

Our website (branchkey.com) does not use tracking cookies. We use Cloudflare Web Analytics, which is a cookie-free, privacy-friendly analytics service. No cookies are placed on your device when you visit our website.

8. Supervisory authority

You have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) if you believe we are processing your personal data in violation of the GDPR. Website: autoriteitpersoonsgegevens.nl

9. Changes to this policy

We may update this privacy policy from time to time. We will notify you of any material changes by email at least one month before they take effect. The current version is always available at branchkey.com/privacy.

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