

# Data Privacy – Frequently Asked Questions

## DATA PRIVACY IS OUR PRIORITY

We know how important it is to keep personal data safe, and we take that responsibility seriously.

To make sure you are in good hands as a customer, we have gathered answers to questions often received regarding data protection and privacy.

If you are not satisfied with the below answers, please do not hesitate to contact us at [privacy@bubbi.ai](mailto:privacy@bubbi.ai) or visit our website: <https://www.bubbi.ai>.

## FREQUENTLY ASKED QUESTIONS

### Q1: How do Bubbi's services work?

**A:** Bubbi is a provider of an **automated personalisation** tool. In brief, we analyse the **behaviour** of visitors on the customer's website to tailor the user experience and thereby increasing conversion rate and average order value. To achieve this goal, we are carrying out analyses, follow-ups and compiling statistics to improve and develop the services.

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### Q2: User agent string, behavioural data and order ID – what does it mean?

**A:** To provide our services, the Bubbi Pixel collects behavioural data of website visitors, such as webpage visits, clicks, impressions and scrolls, including a user agent string with information on visitors' web browser and type of device, as well as IP address. The IP address is anonymized in connection with it being stored.

This means that we **cannot** identify a specific visitor (e.g. by name) based on the user agent string and the behavioural data. However, given the extensive interpretation of "personal data" in relevant case law under the GDPR, we are treating this information as personal data.

Order ID does **not** include any order details, and is only used to ensure that no duplicated orders are collected.

For more information on why we need to process above personal data, please see the relevant data processing agreement.

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### Q3: What is Bubbi's role when processing personal data?

**A:** When processing personal data to provide the services (see Q1 and Q2), Bubbi will act as a **data processor** on behalf of the customer as data controller under the GDPR. See the relevant data processing agreement for more information.

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### Q4: How is personal data collected?

**A:** Personal data is collected via the Bubbi Pixel, which the customer implements on its website. In other words, the personal data is **generated from the user** who visits the customer's website.

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**Q5: Why is Bubbi asking for access to our analytics tool during the implementation phase?**

**A:** If you use another analytics tool, we will ask you to provide us access to such account when implementing the Bubbi Pixel. The only reason for this is to, based on aggregated statistics, manually verify previous website traffic and orders. Such information is then compared against Bubbi's data to **validate data quality**. **No personal data** will be processed by Bubbi when accessing the analytics tool and Bubbi will only have access during the implementation phase.

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**Q6: How can website visitors exercise their rights under the GDPR?**

**A:** Since it is not possible to identify specific website visitors based on the user agent string and the behavioural data, Bubbi will not, as a main rule, be able to assist the customer with data subject right requests under the GDPR.

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**Q7: Where is personal data processed?**

**A:** Personal data is processed in the cloud computing infrastructure provided by Google Cloud Platform (GCP).

Bubbi engages Google Cloud EMEA Limited (Google EMEA) as a sub-processor when providing its services. Google EMEA is based in Ireland (EU) and Bubbi has selected **EU/EEA** as storage option/area for personal data.

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**Q8: How long is personal data kept?**

**A:** All personal data processed by Bubbi on behalf of the customer is kept for **two (2) years** as default. This storage period is necessary to provide optimal insights and statistics to the customer, including for follow-up and development purposes.

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**Q9: How should we describe Bubbi's pixel in our cookie banner?**

**A:** It is of course up to you how you want to describe our pixel to ensure that valid consents are obtained from visitors. That said, here is how we would describe it in short:

*Bubbi is a web tool used to analyse how visitors use and interact with our website, with the aim of tailoring the user experience on the site and providing relevant communication.*

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**Q10: Are website visitors aware of Bubbi's analytics services?**

**A:** To ensure that website visitors are aware of and fine with their personal data being used for analytical purposes, it is important that you as customer (being the website operator and data controller) *inter alia* are obtaining **valid consents** from the visitors and providing **transparent information** on how personal data, including tracking technologies, are used.

Bubbi is happy to provide further support in this regard where needed.

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**Q11: Is Bubbi subject to the AI Act?**

**A:** The Bubbi Pixel will, together with its integrated machine-learning models, constitute an **AI system** as defined in Article 3(1) of the AI Act. When providing the Bubbi Pixel to its customers, Bubbi will act as a **provider of an AI system** under Article 3(3) of the AI Act. The Bubbi Pixel will, however, constitute a **minimal risk AI system**, and therefore not be subject to any specific obligations under the AI Act.