

Privacy Policy

CosmiCompli – a SaaS platform operated by **ML Cosmetic Science Consulting AB**

Org. no. 559399-9252 | Registered in Sweden
(registered 2022-10-04)

Registered address: Surbrunnsgatan 37, 113 48
Stockholm, Sweden

Contact: [PRIVACY EMAIL ADDRESS]

Last updated: [DATE]

1. Who We Are

ML Cosmetic Science Consulting AB ("**we**," "**us**," "**ML**," operating the **CosmiCompli** platform) is a Swedish limited company (aktiebolag) and the data controller – and, for content you submit to the platform, in most cases the data **processor** – responsible for personal data under the EU General Data Protection Regulation (GDPR) and the Swedish Data Protection Act (Dataskyddslagen).

If you have questions about this policy or how we handle your data, contact us at [PRIVACY EMAIL ADDRESS].

[If applicable: We have appointed a Data Protection Officer. Contact: [DPO NAME / EMAIL]]

2. Our Role: Controller vs. Processor

Because CosmiCompli is a self-serve SaaS platform rather than a bespoke advisory engagement, your role and ours differ depending on the data type:

- **As controller**, we determine the purpose and means of processing your **account and billing data** (name, email, company, payment records, usage logs) — this Privacy Policy governs that data.
- **As processor**, when you upload **ingredient lists, formulas, PIFs, or other product data** into the platform on behalf of your business, you (the client) are the controller of that data, and we process it strictly on your instructions under the terms of our **Data Processing Agreement (DPA)** — see Section 9.

3. What Data We Collect

Category	Examples	Source
Account data	Name, email, company	You, at signup

Category	Examples	Source
	name, job title, login credentials	
Platform content (client-controlled)	Ingredient lists, product formulas, INCI names, PIF documents, compliance check submissions	You, uploaded to the platform
Payment information	Billing name, address, subscription tier, transaction history (card details handled directly by our payment processor)	You, via [PAYMENT PROCESSOR NAME]
Usage/product data	Login times, features used, in-app	Automatically, via the platform

Category	Examples	Source
	actions, support tickets	
Website usage data	IP address, browser type, pages visited, referral source	Automatically, via cookies/analytics – see our Cookie Policy
Communications	Support emails, onboarding calls, chat messages	You, directly

We do not knowingly collect special category data (e.g., health data about identifiable people) – ingredient lists and formulas relate to products, not individuals – but please avoid including personal or health data in any upload.

4. Why We Process Your Data (Legal Basis)

Purpose	Legal basis (GDPR Art. 6)
Providing the CosmiCompli platform and its features (account, dashboard, compliance checks)	Performance of a contract (Art. 6(1)(b))
Processing client-uploaded formula/ingredient data	Performed under instruction as processor, per our DPA with each client
Responding to support enquiries	Legitimate interests (Art. 6(1)(f))
Sending product updates or marketing emails	Consent (Art. 6(1)(a)) – withdrawable anytime
Website analytics and advertising cookies	Consent, via our cookie banner
Complying with tax, accounting, and invoicing law	Legal obligation (Art. 6(1)(c))
Improving and securing the platform	Legitimate interests, balanced against your rights

5. How Long We Keep Your Data

Data type	Retention period
Account data	Duration of your subscription + [RETENTION PERIOD] after closure
Client-uploaded formulas/ingredient lists	Duration of your subscription; deleted or returned within [X days] of account closure per our DPA, unless you request earlier deletion
Free compliance check submissions (no account)	[RETENTION PERIOD – e.g., 90 days, then deleted or anonymised]
Billing/invoicing records	7 years (Swedish Bookkeeping Act requirement)
Marketing contact list	Until you unsubscribe or [X months of inactivity]
Website analytics data	[RETENTION PERIOD per analytics tool default]

6. Who We Share Data With

We use the following categories of subprocessors/recipients, each bound by a data processing agreement (see also our public Subprocessor List, Section 10):

- **Hosting/infrastructure provider:** [HOSTING PROVIDER NAME]
- **Cloud storage:** [CLOUD STORAGE PROVIDER] — stores uploaded formulas and compliance documents
- **Payment processor:** [PAYMENT PROCESSOR NAME]
- **Email/CRM tool:** [EMAIL/CRM TOOL NAME]
- **Support/helpdesk tool:** [SUPPORT TOOL NAME, if used]
- **Analytics/advertising platforms:** Google Search Console [/ Analytics], LinkedIn Insight Tag, Meta (Facebook) Pixel — see our Cookie Policy
- **Legal/regulatory authorities:** where required by law

We do not sell personal data. We do not share client formulas or ingredient lists with other clients or unrelated third parties.

International transfers

Some subprocessors may process data outside the EU/EEA (e.g., in the US). Where this occurs, we rely on [EU Standard Contractual Clauses / an adequacy decision / another approved safeguard – specify per provider], as required by GDPR Chapter V.

7. Your Rights

Under GDPR you have the right to: access your data, correct inaccuracies, request deletion, restrict or object to processing, data portability, and withdraw consent at any time. You may also lodge a complaint with the Swedish Authority for Privacy Protection (IMY) – www.imy.se – or your local EU data protection authority.

To exercise these rights, contact [PRIVACY EMAIL ADDRESS]. We respond within one month as required by law. Where you are our client's end user and we act only as processor, we will direct your request to the relevant client (controller) unless you contact us directly with an account-level request.

8. Security

We use appropriate technical and organisational measures – encryption in transit and at rest, access controls, [OTHER MEASURES] – to protect account data and uploaded formulas against unauthorised

access, loss, or disclosure. See our DPA for the full security commitments made to business clients.

9. Data Processing Agreement (DPA)

Business clients uploading product/formula data to the platform are covered by our standard DPA, incorporated by reference into our Terms of Service. Contact [CONTACT EMAIL] to request a signed copy for your records.

10. Subprocessor List

An up-to-date list of subprocessors is available at [SUBPROCESSOR LIST URL] or on request. We will notify clients of material changes to this list per the notice period in our DPA.

11. Cookies

See our full [Cookie Policy] for details on cookies and how to manage your preferences.

12. Changes to This Policy

We may update this policy periodically. The "Last updated" date above reflects the latest version. Material changes will be communicated via [email / in-app notice / website banner].

13. Contact

ML Cosmetic Science Consulting AB
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Email: [PRIVACY EMAIL ADDRESS]