

## MVP (Minimum Viable Product) Disclaimer

By clicking “Agree” , I acknowledge that:

- I am interacting with an AI-powered system via chat and voice for business consultation and onboarding support.
- My input will be recorded, collected, and processed to personalize my experience and guide me toward the right product.
- I consent to the collection of my business-related data, which will be stored securely and processed by third-party services (AWS, Hetzner, AWS Polly, Mistral) as described in the Privacy Policy.
- I understand that I should avoid sharing sensitive personal information. Business-related data will be deleted after 7 days of inactivity.
- The AI assistant is non-autonomous and purely consultative, with all actions requiring user confirmation.
- **Disclaimer:** I acknowledge that no legal claims can be made if the AI assistant recommends offers due to a technical error that are demonstrably unrelated to the product portfolio of the visited website.

☐ I consent to the collection and use of my business-related chat and voice data to improve customer support services.

☐ I consent to sharing my data with third-party providers to enhance and train our customer support models.

## Privacy Policy for AI Sales Agent

**Effective Date:** 01.03.2025

### 1. Introduction

Holistic Payment Connect GmbH and its AI service provider, Mind Loom Solutions FlexKapG ( “we,” “our,” or “us” ), are committed to protecting your privacy. This Privacy Policy explains how we collect, use, store, and protect your personal data when you interact with our AI Sales Agent ( “Service” ).

Our AI service is not designed to support all types of conversations. It is specifically tailored to assist enterprises in selecting and purchasing cash registry and payment solutions.

By using our Service, you agree to the terms of company’ s Privacy Policy.

### 2. Legal Basis for Data Processing

We process your data based on the following legal grounds under the **General Data Protection Regulation (GDPR)**:

- **Consent (Art. 6(1)(a) GDPR):** When you voluntarily provide data for AI-based product recommendations.
- **Contractual Necessity (Art. 6(1)(b) GDPR):** When processing is required to assist in product selection and onboarding.
- **Legitimate Interests (Art. 6(1)(f) GDPR):** To improve our AI’ s accuracy and ensure security and compliance.

### 3. Data We Collect

When you interact with our AI Sales Agent, we may collect the following types of data:

- **Business-Related Information:** Business name, industry, company size, and contact details to recommend suitable products.
- **Interaction Data:** Text and voice interactions with the AI system to personalize recommendations.
- **Session Metadata:** Session timestamps, preferences, and activity logs.
- **Audit Trail Data:** Logs of interactions for compliance and security purposes.

**Important Note:** Please **do not** share sensitive personal information such as financial account details, government identification numbers (unless explicitly required), or health-related data. We will **never** request such details unless mandated by a partnering financial institution as a precondition for providing card acceptance services.

### 4. How We Use Your Data

We use the collected data for the following purposes:

- To provide **personalized** recommendations for cash registry and payment solutions.
- To improve the accuracy and functionality of our AI system.
- To ensure **compliance and security** through audit logs.
- To prefill registration and purchase forms (**subject to your final confirmation**).
- To deliver an efficient and user-friendly experience.

**Automated Decision-Making:** Our AI system provides **advisory** recommendations but **does not make automated decisions** that affect your rights or legal standing.

## 5. Data Sharing & Third-Party Services

We do **not** sell your data to third parties. However, to provide the Service, we may share your data with the following GDPR-compliant service providers:

Provider	Purpose	Location
AWS (Amazon Web Services)	Data storage and processing	EU-based servers
Hetzner Cloud	Virtual machine hosting	Germany (GDPR-compliant)
AWS Polly	Text-to-speech services	EU-based processing
Mistral (public endpoint)	Large Language Model (LLM) inferencing	EU-based servers
Langfuse	Audit trail logging & monitoring	EU-based servers

All third-party providers have **Data Processing Agreements (DPA)** with us to ensure compliance with **GDPR**.

**International Data Transfers:** If data is processed outside the EU, we ensure appropriate safeguards such as **Standard Contractual Clauses (SCCs)** in line with GDPR requirements.

## 6. Data Retention & Deletion

- **Business-related data** is stored for a maximum of **7 days** following inactivity, after which it is permanently deleted.
- **Audit logs** may be retained longer for compliance and security reasons, in line with legal obligations.
- You can request **immediate deletion** of your data at any time (see Section 7).

## 7. Your Rights Under GDPR

Under GDPR, you have the right to:

- **Access** – Request a copy of your stored data.
- **Correction** – Request correction of inaccurate data.
- **Deletion ( “Right to Be Forgotten” )** – Request data deletion, subject to legal and operational requirements.
- **Withdraw Consent** – Revoke previously given consent for data processing.
- **Data Portability** – Request your data in a machine-readable format (Art. 20 GDPR).
- **Object to Processing** – Object to data processing based on legitimate interests (Art. 21 GDPR).

To exercise any of these rights, please contact us at [office@holisticpayment.com](mailto:office@holisticpayment.com).

If you believe your data protection rights have been violated, you have the right to file a complaint with the **Austrian Data Protection Authority (Österreichische Datenschutzbehörde)** at [www.dsb.gv.at](http://www.dsb.gv.at).

## 8. Security Measures

We implement strict security protocols, including:

- **End-to-end encryption** (data in transit & at rest).

- **Regular security audits** and penetration testing.
- **GDPR-compliant storage** on AWS and Hetzner Cloud.

## 9. Changes to This Policy

We may update this Privacy Policy from time to time. Any significant changes will be posted on our website, along with an updated effective date.

## 10. Contact Information

For privacy-related inquiries, please contact:

**Email:** [office@holisticpayment.com](mailto:office@holisticpayment.com)

**Address:** Gerichtsweg 7, 2540 Bad Vöslau, Austria

## Terms of Use for AI Agents

**Effective Date:** 01.03.2025

### 1. Acceptance of Terms

By using the AI Sales Agent, you agree to these Terms of Use. If you do not agree, please refrain from using the Service.

### 2. Service Description

The AI Sales Agent assists with product selection for cash registries and payment terminals. It is **purely informational** and requires **user confirmation** before executing any actions.

### 3. User Responsibilities

- Provide accurate business information.
- Avoid sharing sensitive personal data.
- Avoid any form of misleading behavior, misconduct, or misuse during interactions with the AI Sales Agent.
- Review and confirm any prefilled forms before submission.

### 4. Limitations of Liability

We are **not responsible** for decisions based on AI recommendations. The final decision is yours.

### 5. Data Processing & Privacy

Your use of the Service is subject to our **Privacy Policy**:

 [Privacy Policy](#)

 [Terms & Conditions](#)

### 6. Governing Law & Jurisdiction

These Terms of Use are governed by **Austrian law**. Disputes will be settled in the **competent courts of Vienna, Austria**.