

Privacy Policy

1. DATA CONTROLLER

ireo GmbH
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2. ABOUT THIS PRIVACY POLICY

This Privacy Policy was created to comply with the EU General Data Protection Regulation (GDPR) and to show what information we collect and how this information is used. As of June 18, 2025. This document applies to our website WWW.STORYWI.SE, our web application, and our social media presences.

3. PURPOSES OF DATA PROCESSING

CONTACT FORM / CHAT ON THE HOMEPAGE AND IN THE WEB APP

Your personal data that you transmit to us electronically via the contact form or by email (e.g., name, email address) will only be used by us for the specified purpose and stored securely. Your data will not be passed on to third parties without your express consent. An exception to this are our service partners (e.g., hosting providers, email providers) that we require for processing and with whom a data processing agreement exists in accordance with Art. 28 GDPR. We therefore use your provided personal data only for communication with you and for the processing of services offered on the website (Art. 6(1)(b) GDPR). Personal data is necessary for contact to be made. Your personal data will not be disclosed by us. We store your data from the contact form for as long as it is necessary to process your inquiry and any subsequent questions. Afterward, the data will be deleted, provided there are no legal retention obligations to the contrary. However, we cannot rule out that this data may be viewed in the event of unlawful conduct.

REGISTRATION/LOGIN AND SINGLE SIGN-ON

You have the option on our website to register by providing personal data. The specific personal data transmitted is determined by the input form used for registration/login. The personal data entered is collected and stored exclusively for the fulfillment of the contract (Art. 6(1)(b) GDPR). Upon registration/login, the IP address as well as the date and time of the registration/login are stored. This data is stored to prevent the misuse of our services (Art. 6(1)(f) GDPR (legitimate interest)). As a general rule, this data is not passed on to third parties unless there is a legal obligation to do so or the disclosure serves the enforcement of legal claims. The registration with personal data serves to offer you content or services that, by their nature, can only be offered to registered users (Art. 6(1)(b) GDPR), as the contract with you could not otherwise be

fulfilled. With your consent upon registration, you allow us to contact you by phone and in writing in accordance with § 174 (1) TKG (Austrian Telecommunications Act) for the purpose of executing the contract. Informational emails about the use of the platform are sent out as an extended manual, from which you can unsubscribe with a single click.

To provide a convenient option for logging into the system, we also offer the ability to log in using existing accounts from other service providers. Using storywise with an external account also provides the company responsible for that account with the necessary user information for login. The companies to which the data is transmitted are international companies headquartered in the USA, and thus the CLOUD Act applies to them.

The offered SSO providers (as of May 2024) are:

- Microsoft (Business and Home accounts, LinkedIn)
- Google
- Meta (Facebook)

IMPORTANT NOTE ON DATA TRANSFER TO THE USA:

When using Single Sign-On (SSO) services, your login data is transmitted to the respective providers. All offered SSO providers are US companies or have their headquarters in the USA:

- Microsoft (Business and Home accounts, LinkedIn)
- Google
- Meta (Facebook)

Specifically, this means:

- Your data is subject to the US CLOUD Act (Clarifying Lawful Overseas Use of Data Act).
- US authorities can demand access to your data under certain circumstances.
- This can occur even if the data is stored on servers in the EU.
- A level of protection comparable to EU data protection standards cannot be guaranteed.

YOUR ALTERNATIVES:

You can always register directly with storywise without using an SSO service. In this case, your login data will be stored exclusively on our servers in the EU and will not be transmitted to US companies.

By using the SSO services, you expressly consent to this data transfer to the USA (Art. 49(1)(a) GDPR).

4. USE OF ARTIFICIAL INTELLIGENCE

To use our AI services, it is necessary to transmit a large amount of data to the AI providers. This primarily consists of data that users of storywise enter into the system themselves. In this case, ireo GmbH acts as a data processor. When you use our AI service, the data you enter is transmitted to AI service providers commissioned by us. These service providers act as our data processors and are contractually bound by our instructions.

Various AI endpoints are used. These are available in a Microsoft Azure cloud or directly with the providers. The providers are identified by the region from which they are served (e.g., EU/US). Additionally, the user can specify their own endpoints, which are entirely their responsibility and outside the control of ireo GmbH.

IMPORTANT NOTE ON THE PROTECTION OF YOUR DATA WHEN USING AI

As a general rule: The AI service providers we use (e.g., Microsoft Azure, OpenAI) have contractually obligated themselves neither to permanently store your inputs nor to use them for training their models.

Despite these protective measures, we cannot completely rule out access by government authorities. In particular, providers based in the USA are subject to laws such as the CLOUD Act. This can allow US authorities to demand the disclosure of data – even if it is processed on servers in Europe. We have no influence over such legal orders.

As a European alternative, we can use providers like Mistral, whose models are hosted entirely in Europe. This eliminates the specific risk of the US CLOUD Act. Nevertheless, European providers are also subject to the laws of their respective locations. Therefore, access by national investigative authorities in the course of a lawful procedure cannot be completely ruled out here either.

VOICE INPUT AND TRANSCRIPTION SERVICES

To enable features such as voice input, we process audio data recorded through your microphone. To provide transcription, this voice data is temporarily stored on Amazon Web Services (AWS) S3 servers located in the EU and then transmitted to a third-party transcription service for processing.

These transcription service providers act as our data processors and are contractually bound by our instructions. In the future, you may be able to configure which service you wish to use. The currently available services are:

- Mistral AI, a simplified joint stock company with capital of EUR 15,000, listed on the Paris Trade and Companies Register (R.C.S.) under number 952 418 325, with registered offices at 15 RUE DES HALLES, 75001 PARIS, FRANCE.
- Lemon Fox GmbH, Torstr. 195, 10115 Berlin, GERMANY.
- Microsoft Azure AI Services, Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA.

Please note that using Microsoft Azure may involve data transfer to the USA, which is subject to the risks described in this policy (see "IMPORTANT NOTE ON DATA TRANSFER TO THE USA" in Section 3 and "DATA TRANSFER TO THIRD COUNTRIES" in Section 8). Mistral AI and Lemon Fox GmbH are European providers who process data within the EU.

FOR DATA WITH THE HIGHEST PROTECTION REQUIREMENTS:

If your data requires a level of security that excludes such access under all circumstances, please contact us. We offer the option to set up a private, dedicated AI solution for you that remains entirely under your control.

5. SOCIAL NETWORKS

FACEBOOK

When you visit our Facebook company page, your personal data is processed by Facebook. We process the data generated by Facebook in accordance with Art. 6(1)(a) GDPR, as you give us your consent for this by using Facebook. This involves statistical data that we use to analyze our page views, "Likes," post interactions, people reached, post reach, comments, and shared content in order to adapt our social media activities. The statistical data is stored on servers in Europe (and possibly in the USA) and deleted after a maximum of 90 days. In accordance with Art. 26 GDPR, there is joint responsibility for data processing with Facebook – see Facebook.

Information on Facebook's data protection:

[Meta Privacy Policy - How Meta collects and uses user data](#)

INSTAGRAM

When you visit our Instagram company page, your personal data is processed by Instagram. We process the data generated by Instagram in accordance with Art. 6(1)(a) GDPR, as you give us your consent for this by using Instagram. This involves statistical data that we use to analyze our page views, "Likes," post interactions, people reached, post reach, shared content, and comments in order to adapt our social media activities. The statistical data is stored on servers in the USA and deleted after a maximum of 90 days. In accordance with Art. 26 GDPR, there is joint responsibility for data processing with Instagram.

Information on Instagram's data protection:

[Meta Privacy Policy - How Meta collects and uses user data](#)

LINKEDIN

When you visit our LinkedIn company page, your personal data is processed by LinkedIn. We process the data generated by LinkedIn in accordance with Art. 6(1)(a) GDPR, as you give us your consent for this by using LinkedIn. This involves statistical data that we use to analyze our page views, "Likes," post interactions, shared content, and comments in order to adapt our social media activities. The statistical data may be transferred to countries outside the EU and is deleted after 90 days. In accordance with Art. 26 GDPR, there is joint responsibility for data processing with LinkedIn, see <https://legal.linkedin.com/pages-joint-controller-addendum>.

Information on LinkedIn's data protection:

<https://www.linkedin.com/legal/privacy-policy#choices-oblig>

6. RIGHTS OF THE DATA SUBJECT

Regarding your data processed by us, you have the fundamental rights to information, correction, deletion, restriction, data portability, revocation, and objection. If you believe that the processing of your data violates data protection law or that your data protection rights have otherwise been infringed in any way, you can complain to us at office@storywi.se or to the data protection authority.

Registered persons have the option to delete their account directly in the app (Profile => Delete). This also automatically deletes all the personal data that was stored within the storywise system. Your customer data will remain with us for a further two years and will then be deleted, provided no further customer contact exists (for the establishment, exercise, or defense of legal claims (Art. 6(1)(f) GDPR)). Data on documents such as invoices will be stored for a longer period due to statutory retention obligations.

Upon request, we will provide you with information at any time about the personal data we have stored about you. At your request, we will correct or delete your personal data, provided there are no legal retention obligations (such as the tax law retention period of 7 years).

7. DATA PROCESSING WHEN VISITING THE WEBSITE AND USING THE APPLICATION

COOKIES

Our website and our application "storywise" use cookies. Cookies are small text files that are stored on your end device by your browser. They do not cause any harm.

We exclusively use technically necessary (essential) cookies. These are indispensable for the basic operation and core functionality of our services. This includes, for example, storing your login information for the duration of a session (session cookie) or ensuring the security of the connection.

The processing of this data is based on Art. 6(1)(b) GDPR, as it is necessary for the fulfillment of the user agreement with you, and on our legitimate interest according to Art. 6(1)(f) GDPR in providing our services in a secure, stable, and functional manner. For the analysis of website usage, we use a service that operates without the use of cookies (umami). In this process, no personal data is stored in cookies on your end device.

Since we do not use cookies that require consent (e.g., for marketing or advanced analytics), we do not use a separate cookie consent banner.

SERVER LOG FILES

With every access to our website and the storywise application, information is automatically collected and stored by the server in so-called log files. This data is necessary for technical operation.

The following data is logged:

- IP address of the requesting computer
- Date and time of access
- Name and URL of the retrieved file
- Website from which the access is made (Referrer URL)
- Browser used and, if applicable, the operating system of your computer
- For logged-in users: Your internal user ID (User-ID)

The processing of this data is based on our legitimate interest according to Art. 6(1)(f) GDPR. Our legitimate interests are:

- Ensuring a smooth connection setup.
- Ensuring the stability and security of our system.
- Investigating cases of misuse and preventing attacks.
- Analyzing errors to improve our service.

The association of log file data with your user ID is done exclusively for troubleshooting or for investigating security incidents. This data is not merged with other data sources. The server log files are stored for a maximum of 30 days and then automatically deleted, unless longer retention is required for the pursuit of legal claims or the investigation of unlawful conduct.

8. DATA TRANSFER TO THIRD COUNTRIES

When using certain features of our services, your personal data may be transferred to countries outside the EU/EEA, particularly to the USA. This affects:

- Single Sign-On services (see Section 3)
- AI services (depending on the chosen provider)

There is no adequacy decision from the EU Commission for the USA. This means that a level of data protection comparable to EU law cannot be guaranteed. In particular, the following risks exist:

- Potential access by US authorities to your data without your notification
- Limited legal remedies against official measures
- No independent data protection supervision in the sense of the GDPR

Where possible, we use the EU Standard Contractual Clauses as a protective measure. For some services (like SSO), the transfer is based on your express consent.

9. THE COMPETENT DATA PROTECTION AUTHORITY

Österreichische Datenschutzbehörde (Austrian Data Protection Authority)
Barichgasse 40-42
1030 Vienna
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