

Data Protection Policy — Silly Pilot Oy (Velvoite.eu)

DATA PROTECTION POLICY

Silly Pilot Oy (Velvoite.eu) Business ID: 3572343-6

Field	Value
Document Type	Internal Policy
Version	1.2
Effective Date	27 February 2026
Last Reviewed	26 May 2026
Owner	Data Protection Officer
Classification	CONFIDENTIAL — Internal Use Only

Version History

Version	Date	Changes
1.0	February 2026	Initial policy
1.1	February 2026	Added AI Act references, expanded AI processing section Corrected infrastructure provider (GCP, not Hetzner); added
1.2	May 2026	Anthropic and Resend as sub-processors; updated international transfer documentation; annual review

1. Purpose and Scope

This Data Protection Policy establishes how Silly Pilot Oy (operating the “Velvoite.eu” regulatory compliance monitoring platform) collects, processes, stores, and protects personal data in compliance with:

- The EU General Data Protection Regulation (GDPR) 2016/679
- The Finnish Data Protection Act (1050/2018)
- The EU AI Act 2024/1689 (where applicable to AI-powered services)

This policy applies to all employees, contractors, partners, and third-party processors who handle personal data on behalf of the company.

2. Key Definitions

Term	Definition
Personal Data	Any information relating to an identified or identifiable natural person
Data Subject	The individual whose personal data is being processed
Data Controller	Silly Pilot Oy — determines purposes and means of processing
Data Processor	Third party that processes personal data on our behalf
Special Category Data	Sensitive data including health, biometric, political opinions, etc.
Processing	Any operation performed on personal data (collection, storage, use, deletion)
Regulatory Data	Publicly available regulatory documents, guidelines, and legal texts processed by the platform

3. Data Protection Principles

Silly Pilot Oy adheres to the six GDPR principles when processing personal data:

3.1 Lawfulness, Fairness, and Transparency

We process personal data lawfully and transparently. Data subjects are informed about how their data is used through our Privacy Notice.

3.2 Purpose Limitation

Personal data is collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.

3.3 Data Minimisation

We only collect personal data that is adequate, relevant, and limited to what is necessary for the specified purposes. Velvoite.eu processes primarily publicly available regulatory documents; personal data collection is limited to customer account and billing information.

3.4 Accuracy

Personal data is kept accurate and up to date. Inaccurate data is erased or rectified without delay.

3.5 Storage Limitation

Personal data is retained only for as long as necessary for the purposes for which it was collected, as defined in our Data Retention Schedule.

3.6 Integrity and Confidentiality

Personal data is processed securely using appropriate technical and organisational measures to protect against unauthorised access, loss, or damage.

4. Lawful Bases for Processing

Silly Pilot Oy relies on the following lawful bases for processing personal data:

Lawful Basis	Description	Example Use
Contract (Art. 6(1)(b))	Processing necessary for contract performance	Providing regulatory monitoring SaaS services, billing
Legitimate Interest (Art. 6(1)(f))	Processing for our legitimate business interests	Security monitoring, fraud prevention, aggregate product analytics
Consent (Art. 6(1)(a))	Data subject has given explicit consent	Marketing communications
Legal Obligation (Art. 6(1)(c))	Processing required by law	Tax records, accounting

5. Data Subject Rights

Data subjects have the following rights under GDPR, which we are committed to fulfilling:

Right	Description	Response Time
Right of Access (Art. 15)	Obtain confirmation and copy of personal data	30 days
Right to Rectification (Art. 16)	Correct inaccurate or incomplete data	30 days
Right to Erasure (Art. 17)	Request deletion of personal data	30 days
Right to Restriction (Art. 18)	Limit processing of personal data	30 days
Right to Portability (Art. 20)	Receive data in structured, machine-readable format	30 days
Right to Object (Art. 21)	Object to processing based on legitimate interests	30 days

Data subject requests should be sent to: privacy@velvoite.eu

6. Roles and Responsibilities

6.1 Data Protection Officer (DPO)

Contact: dpo@velvoite.eu

- Monitors compliance with GDPR and this policy
- Advises on data protection impact assessments (DPIAs)
- Acts as point of contact for supervisory authorities
- Handles data subject requests

6.2 All Staff

- Follow this policy and related procedures
- Report data breaches immediately to the DPO
- Complete data protection training
- Only access personal data necessary for their role

7. Data Security Measures

7.1 Technical Measures

- Encryption in transit (TLS 1.3) and at rest (AES-256)
- Database isolation using PostgreSQL with access controls
- API authentication via secure tokens and API keys
- Infrastructure hosted on Google Cloud Platform (GCP Cloud Run + Cloud SQL, europe-north1 region, Finland)
- Regular security updates and vulnerability patching
- Database backups with point-in-time recovery
- Vector search (pgvector) data stored within EU jurisdiction
- Redis caching layer on GCP Memorystore (europe-north1, Finland)

7.2 Organisational Measures

- Principle of least privilege for data access
 - Staff data protection training
 - Vendor due diligence for sub-processors
 - Incident response procedures
 - Regular policy reviews
-

8. Product Analytics

Velvoite.eu uses Plausible Analytics to understand how users interact with the platform and to guide product development decisions. Plausible is a privacy-first analytics tool that:

- Does not use cookies or any persistent identifiers
- Does not collect personal data or personally identifiable information
- Processes only anonymised, aggregated usage metrics (page views, feature adoption, session counts)
- Stores all data within the EU (Plausible is an EU-based company, data hosted in Germany)
- Does not share data with third parties or use data for advertising

Because Plausible does not use cookies and does not process personal data, no cookie consent banner or GDPR opt-in is required for this analytics tool. The lawful basis for this processing is Legitimate Interest (Art. 6(1)(f)) — specifically, understanding platform usage to improve the Service.

9. Data Breach Response

In the event of a personal data breach:

1. Immediately report to DPO (within 4 hours of discovery)
2. DPO assesses severity and risk to data subjects
3. If high risk: notify supervisory authority within 72 hours

4. If likely high risk to individuals: notify affected data subjects
5. Document breach in the Data Breach Register
6. Implement remediation measures

Supervisory Authority: *Office of the Data Protection Ombudsman (Tietosuojavaltuutetun toimisto), Finland*

10. International Data Transfers

Silly Pilot Oy processes data within the European Economic Area (EEA). Velvoite.eu infrastructure is hosted entirely within the EU (Google Cloud Platform, europe-north1 region, Finland). When transfers outside the EEA are necessary (e.g., AI model API calls for document processing, payment processing), we ensure adequate safeguards:

- Standard Contractual Clauses (SCCs) with data importers
- EU-US Data Privacy Framework certification verification where applicable
- Adequacy decisions where applicable
- Transfer Impact Assessments for high-risk transfers

Note: Regulatory document content processed by AI models is publicly available legal text and does not constitute personal data. Customer search query text is transmitted to AI providers for semantic processing under data processing agreements; providers are contractually prohibited from using this data for model training.

11. AI and Automated Processing

Velvoite.eu uses AI for regulatory document processing. We ensure:

- AI processing is used for extraction, classification, and summarisation of publicly available regulatory documents
 - AI-generated summaries and obligation extractions are clearly labelled as AI-processed
 - No fully automated decisions with legal effects without human oversight
 - Customer usage data is not used to train AI models
 - AI outputs are informational tools, not legal advice — users must verify information against original regulatory sources
 - Compliance with EU AI Act requirements for AI systems
 - Search queries sent to AI providers are processed under data processing agreements and are not retained by providers for model training
-

12. Sub-Processors

The following third-party processors handle data on our behalf:

Sub-Processor	Purpose	Data Processed	Data Location	Safeguards
Google Cloud Platform (GCP)	Infrastructure hosting (Cloud Run, Cloud SQL, Memorystore Redis)	All platform data (account data, regulatory corpus, application data)	EU (europe-north1, Finland)	DPA, EU hosting, SOC 2
Google (Gemini API)	AI document extraction, summarisation, and classification	Regulatory document text (public data), search query metadata	US/EU	SCCs, DPA, EU-US DPF certified
Anthropic (Claude API)	AI fallback processing, MCP integration	Search queries, regulatory document text (public data)	US	SCCs, DPA
Stripe	Payment processing	Name, email, billing address, payment method	EU/US	SCCs, PCI DSS compliant, EU-US DPF certified
Resend	Email digest delivery (daily/weekly/monthly regulatory updates)	Email address, regulatory content summaries (no personal data in content)	US	SCCs, DPA
Plausible Analytics	Privacy-first product analytics (no cookies, no personal data)	Anonymised usage metrics only	EU (Germany)	EU-based, no personal data processed

Changes to this sub-processor list will be communicated to customers with 30 days' notice. Customers may object to new sub-processors per the Terms of Service.

13. Platform Disclaimer

Velvoite.eu is a regulatory information monitoring tool. It is NOT a legal advisory service. Information provided through the platform, including AI-generated summaries and obligation extractions, should not be relied upon as legal advice. Users should consult qualified legal professionals for compliance decisions.

14. Policy Review

This policy is reviewed annually or when significant changes occur in data processing activities, legal requirements, or business operations.

DOCUMENT APPROVAL

Role	Name	Date
Founder & CEO	Matti Puhakka	26.5.2026
Data Protection Officer	Matti Puhakka	26.5.2026

Silly Pilot Oy — Y-tunnus 3572343-6 — legal@velvoite.eu — velvoite.eu