IdeaLine · GDPR and UK GDPR Supplement

Draft, pending legal review. This document is a draft while our counsel completes their review. It may change before IdeaLine opens to the public, and nothing here is final until we publish a reviewed version with an effective date. This is not legal advice. Questions? Write to hello@idealine.io.

GDPR and UK GDPR Supplement

Last updated [EFFECTIVE DATE]

1. What this covers

This supplement explains how IdeaLine meets the EU General Data Protection Regulation (GDPR) and the UK GDPR and Data Protection Act 2018. It adds to the Privacy Policy, the Data Policy and the Data Processing Addendum. It is for customers in the EEA, the UK and Switzerland, and anyone who needs the detail. IdeaLine LLC is based in the United States.

2. Our roles

- **Processor.** For the content you and your team put into a workspace, you are the controller and IdeaLine is your processor. We act only on your documented instructions (the Terms, the DPA and your settings). The DPA contains the Article 28 terms.
- **Controller.** For account, security, billing, support (including **Report an issue** reports), website analytics and our own business records, IdeaLine is the controller.

3. Lawful bases (where we are controller)

What we do	Basis
Create and run your account, give you the Service	Contract (Article 6(1)(b))
Secure the Service, prevent abuse and sharing of accounts, back up, fix problems and answer support requests and issue reports	Legitimate interests (6(1)(f)): running a safe, reliable service
Take payments and keep tax records (through Paddle as merchant of record)	Contract and legal obligation (6(1)(b), (c))
Anonymous website page-view totals (no cookies, visitor hash discarded after 24 hours)	Legitimate interests
In-app usage analytics linked to an account ID	Legitimate interests, with an off switch, and off automatically when

What we do	Basis
	your browser sends Global Privacy Control
Sending the waitlist and product emails you asked for	Consent, which you can withdraw at any time

4. Record of processing (Article 30)

We keep a written record of our processing, as controller and as processor, and give it to a supervisory authority on request. In summary:

Activity	Data subjects	Data	Recipients	Kept
Workspace service (processor)	Customer's team, clients and contacts	Account details and whatever the customer enters	Subprocessors in the Data Policy	While the account is active, then deleted as the DPA says; backups overwritten on their cycle
Accounts and security (controller)	Users	Email, name, role, sign-in events, device identifier, IP address and region	Supabase, Vercel, Cloudflare, Resend	Account life; sign-in events 90 days
Billing (controller)	Workspace owners	Billing name, plan, payment status (card data stays with Paddle)	Paddle	As tax law requires
Support and issue reports (controller)	Users	Email, issue type, a note of up to 50 characters, screen name, app version, support code	Resend (email), Supabase	[24 months after the issue is closed]
AI assist and Sparky	Users	The text of one request,	Vercel AI Gateway,	Content not kept; usage

Activity	Data subjects	Data	Recipients	Kept
(processor for AI assist; controller for Sparky questions)		names replaced and contact details removed; usage counts, never the text	Anthropic	records with the account
Website analytics (controller)	Visitors	Cookieless page views, visitor hash discarded after 24 hours	Vercel	Totals [12 months]

5. EU and UK representative, and a data protection officer

Where the law requires us to have a representative in the EU or the UK (Article 27), it is: [REPRESENTATIVE NAME, ADDRESS AND EMAIL, or delete this section if counsel confirms none is needed]. We have not appointed a data protection officer because our processing is not at the scale or kind that requires one; you can still reach our privacy contact at hello@idealine.io.

6. Transfers outside the EEA and UK

Our primary database is in Canada (Central). Some subprocessors are in the United States or run globally. Where personal data leaves the EEA or the UK, we rely on an adequacy decision (for Canada and, for certified companies, the EU-US Data Privacy Framework and its UK extension) or on the Standard Contractual Clauses and the UK Addendum, together with the measures in the DPA (encryption, access controls and limits on who can see data). The DPA incorporates the Clauses. [Counsel: confirm each subprocessor's transfer mechanism.]

7. Your rights

You may ask us to access, correct, delete, restrict or move your personal data, object to processing based on legitimate interests, and withdraw consent. Write to hello@idealine.io from the address on your account. We reply within one month. You can also delete your own account in Settings, export your data at any time, and turn off in-app analytics. If you are a team member and your data is in your employer's workspace, ask your employer first; we help them answer. You may complain to your supervisory authority (in the UK, the Information Commissioner's Office).

8. Impact assessment for the AI features

We assessed the optional AI features (Article 35 considers new technologies). A short summary:

Question	Our assessment
What is processed?	The text a person chooses to run through a feature, with names replaced and emails, phone numbers and links removed before sending; nothing else.
Why is it needed?	To draft, summarize and search work the customer is already doing. Each feature is optional and off by default.
Who decides?	The customer (controller) turns it on; a person reviews every draft before using it; no automated decision with legal or similar effect is made.
Main risks	Sensitive data typed into a prompt; a wrong or biased answer relied on; the provider keeping or training on content; exposure in transit.
Measures	Off by default and one switch to turn off; instructions not to enter highly sensitive data; limits on size and rate; names and contact details removed; providers whose agreements prohibit training; encryption in transit; drafts labelled and never applied automatically; content not stored by us; usage logged without content.
Result	Low residual risk. We repeat this assessment when a feature or provider changes materially.

9. Personal data breaches

We tell affected customers without undue delay, and within 48 hours of confirming a breach, as the DPA says. Where we are controller we tell the supervisory authority within 72 hours of becoming aware where the law requires it, and the people affected where the risk is high.

10. Children

IdeaLine is for working teams and is not directed at children. We do not knowingly collect data from anyone under 16 (or the age set locally).

11. Contact

IdeaLine LLC, 5900 Balcones Dr, #33218, Austin, TX 78731, US. hello@idealine.io.