

Privacy Policy

sallsa.ai - operated by JT holding GmbH
Effective: March 16, 2026

1. Data Controller

Data Controller within the meaning of the GDPR:

JT holding GmbH

Thierseestr. 15d, 6330 Kufstein, Austria

FN 593407h | ATU78831025

Managing Director: Jurij Tkaciov

Email: legal@sallsa.ai

A Data Protection Officer is not appointed pursuant to Art. 37 GDPR, as the requirements are not met. For data protection inquiries, please contact the email address above.

2. Scope

This Privacy Policy applies to the processing of personal data of:

- Platform users (registered account holders)
- Visitors to sallsa.ai

This Privacy Policy does not govern the processing of personal data of leads and third-party contacts that users process through the Platform. Our users act as Data Controllers and we act as Data Processor pursuant to Art. 28 GDPR.

3. Data We Collect

3.1 Registration and Account Data

During registration we collect: full name, business email, company, job title.

3.2 Usage and Technical Data

We automatically collect: IP address, browser type, OS, pages visited, session duration, error logs.

3.3 Payment Data

Payment processing is handled entirely by Stripe. We do not store full card details.

4. Processing of Lead Data (as Data Processor)

As Data Processor, we process lead data following the principle of data minimization:

4.1 Stored Data

- LinkedIn profile ID and profile link
- Profile photo (if publicly available)
- Publicly available content: posts, comments, likes
- Message history between user and lead

4.2 Data Not Stored

Email addresses and phone numbers are not stored in our database. They are retrieved on-demand through Apollo.io when needed and are not cached.

4.3 Timing of Data Collection

Public LinkedIn data is only collected after a lead has accepted the user's connection request (confirmed contact).

5. Legal Bases (Art. 6 GDPR)

- Art. 6(1)(b) - Contract performance: Processing to provide the Service
- Art. 6(1)(f) - Legitimate interest: B2B outreach, usage analytics, IT security
- Art. 6(1)(c) - Legal obligation: Retention of transaction records
- Art. 6(1)(a) - Consent: For non-essential cookies and marketing

6. Retention Periods

We retain personal lead data for a maximum of 90 days.

- 60 days without acceptance: Automatic deletion. Rationale: position and company may have changed.
- Active communication: Data retained for duration of business relationship.
- Opt-out: Immediate deletion except LinkedIn URL in blacklist.
- User data: Duration of contract + statutory retention (up to 7 years under Austrian BAO).

7. Automated Decision-Making (Art. 22 GDPR)

The Platform uses AI-powered ICP scoring to determine lead relevance. This solely affects outreach prioritization and has no significant impact on the data subject.

8. Sub-processors

Provider	Location	Purpose	Transfer Mechanism
Supabase Inc.	Frankfurt, DE	Database hosting	EU location
Unipile SAS	EU	LinkedIn API	EU location
Apollo.io Inc.	USA	On-demand lead data	EU SCCs
Anthropic PBC	USA	AI text processing	EU SCCs
Hostinger Int.	EU (Lithuania)	Server infra	EU location
Stripe Inc.	USA	Payments	EU SCCs

9. Rights of Data Subjects

- Access (Art. 15): Right to information about stored data
- Rectification (Art. 16): Right to correction of inaccurate data
- Erasure (Art. 17): Right to deletion of your data
- Restriction (Art. 18): Right to restriction of processing
- Data portability (Art. 20): Right to receive data in structured format

- Objection (Art. 21): Right to object to processing based on legitimate interests

Please direct requests to: legal@sallsa.ai. We will respond within 30 days.

You may lodge a complaint with: Austrian Data Protection Authority (DSB), Barichgasse 40-42, 1030 Vienna, dsb@dsb.gv.at

10. Data Breach Notification

In the event of a breach, we will notify the supervisory authority within 72 hours (Art. 33 GDPR). Where high risk exists, we will notify affected persons without undue delay (Art. 34 GDPR).

11. Consent Logging

Upon registration, we record: who, when, and which version of documents was accepted. Consent logs are retained indefinitely (legal obligation).

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