

# PRIVACY POLICY

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## INTRODUCTION

Welcome to elephantroom, elephantroom is a design-tech startup that lets users furnish their homes by simply talking — the AI handles layout, product selection, and styling in real-time 3D.

The term “elephantroom”, “we”, “our”, “us” refers to Liquid Sassella srl, a legal entity incorporated and acting under the laws of Italy with its registered address at Piazza Garibaldi 5, Sondrio, Italy, 23100.

The term “you”, “your”, “yours” defines a visitor of one of our websites, a user of one or more of our Services as defined below, or a customer of a user.

The term “Personal Data” means information that either in isolation or in combination with other information enables you to be directly or indirectly identified.

We place great importance on the privacy and security of your Personal Data and are committed to ensure appropriate protection of any Personal Data we obtain from you or about you.

This privacy policy (“Privacy Policy”) explains how we collect, use, share and protect your Personal Data obtained by us in course of your interaction with our websites elephantroom.ai, and your use of our services offered either via our websites or mobile applications (collectively, “Services”). It also outlines the rights you have and control you can exercise in relation to it.

Please carefully read this Privacy Policy and make sure you fully understand it and agree to it before interacting with our websites and using our Services.

This Privacy Policy is a legal part of the [Terms of Service](#) of elephantroom. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms of Service.

## DATA CONTROLLER/DATA PROCESSOR

Under the General Data Protection Regulation (“GDPR”) framework, the terms “data controller” and “data processor” have specific meanings:

- Data Controller is the entity that determines the purposes and means of processing Personal Data. The data controller decides “why” and “how” personal data should be processed.
- Data Processor is the entity that processes Personal Data on behalf of the data controller. The data processor follows the instructions of the data controller regarding the processing of the data.

In cases when elephantroom provides Services to our end users and determines the purposes and means of processing Personal Data, elephantroom acts as a “data controller”. In this role we manage the processing of Personal Data, while our third-party service providers act as the “data processors”, processing the Personal Data on behalf of elephantroom. We may engage various third-party service providers in order to process your data more effectively.

In cases when elephantroom Services are used for business and/or educational purposes – such as by professional designers, legal entities, schools and other institutions, that provide services to their own customers, and these entities determine the purposes and means of data processing, elephantroom acts as “data processor”, processing the data according to the instructions provided by these entities. In such cases, the data processing is governed by the GDPR, unless a different data processing agreement has been signed between the data controller and elephantroom.

## CATEGORIES OF PERSONAL DATA WE COLLECT

Depending on how you interact with us (i.e., by contacting us, by visiting our websites or by using our Services, etc.) we may collect the following categories of your Personal Data:

## I. PERSONAL DATA WE RECEIVE FROM YOU:

Account Information:	When you create an account with us (either as an individual or as a business representative), we collect information associated with your account, such as name, email address, hash of your password and other account-related information. To access certain features within the Services, such as “Spaces,” you may need to provide your home location or address. Users who make purchases within our Services, provide us their payment details. We further process data relevant to the provision and billing for our Services, such as date and time of purchase, the billing period, successful payment processing and related transactions history.
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Social Media Information:	If you chose to register or log into your account with us using a single sign-on service (e.g., Google Sign-In, Sign in with Apple, Facebook Login) that authenticates your identity and connects your single sign-on service information with us, we will collect the information needed for the registration or log-in that you have permitted your single sign-on service provider to share with us, such as your name, email address and user ID. The use of shared information will be governed by the single sign-on service provider’s privacy policy and this Privacy Policy.
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User Contributions:	When you use our Services, we collect Personal Data that you choose to include in your input, including file uploads, or feedback you provide to our Services.
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Following anonymization of any Personal Data in the User Contributions, we may use such content to improve our Services, including to train our AI algorithms.

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Chat Feature	When using our AI-powered chat feature (LLM), you may voluntarily share sensitive details such as personal preferences, lifestyle habits, or other information. By initiating the chat, you explicitly consent to our processing of this information to provide personalized design recommendations. You can withdraw this consent at any time through your account settings.
Communication Information:	When you communicate with us (for example, by emailing us at <a href="mailto:info@elephantroom.ai">info@elephantroom.ai</a> ), we collect your name, contact information and the contents of messages you send to us.
Other Information You Provide:	We collect other information that you may provide to us, for example, when you participate in our contests and surveys or provide us with information to establish your age or identity.
Referral link	Our referral links track only anonymous, aggregated data regarding your purchasing behavior. They do not track personally identifiable information linked directly to your identity.

## II. PERSONAL DATA COLLECTED OR GENERATED THROUGH YOUR USE OF OUR WEBSITES AND SERVICES:

Log Data:	When you access or use our websites or Services, we automatically collect a variety of technical information, recording it in log files. Such information may include user ID, device identifiers, Internet Protocol (IP) address, approximate location information and time zone, your browser
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type and settings, the date and time the website or Services were used, language preferences.

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Usage Data:	To provide us additional context about your use of our websites and Services, we automatically collect information such as session duration, your language settings, type of content that you view or engage with, features you use and actions you take when interacting with our websites and Services.
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Device Information:	We automatically collect information about devices accessing our websites and Services, including the type of device, operating system used, browser information and device identifiers. The information we collect may depend on the type of the device you use and its settings.
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Cookie Data:	In order to provide you with a variety of features and to improve your user experience, we automatically collect some Personal Data through cookies and similar technologies on our websites and Services. For more information about how we use these technologies and your privacy choices, please see our <a href="#">Cookies Policy</a> .
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We create a referral link when you decide to purchase from third parties to understand your purchasing behaviour

### III. PERSONAL DATA RECEIVED FROM OTHER SOURCES:

We may obtain additional information about you from third-party service providers, such as marketers, partners, analytics services, researchers and others.

No Sensitive Data

We do not collect and do not intend to collect special categories of Personal Data (also known as “sensitive data”), such as any information about health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, criminal background, data concerning a person’s sex life or sexual orientation.

Aggregated and Anonymized Information:

We may aggregate and anonymize Personal Data, transforming it so that it no longer relates back to a person's identity and is no longer considered Personal Data. This process allows us to generate other data, which we may use to improve our Services, to conduct research or for other business purposes.

## HOW WE PROCESS YOUR PERSONAL DATA

Our AI-based home furnishing recommendations constitute profiling under GDPR, as we process your preferences, behavior, and other provided information to generate personalized design suggestions. You have the right to explicitly object to profiling activities. To do so, please adjust your privacy settings through your account or contact us directly at [dpo@elephantroom.ai](mailto:dpo@elephantroom.ai).

Additionally, we may process the Personal Data we collect for the following purposes:

- to provide and maintain our Services, to operate and administer our websites and business;
- to monitor and improve our Services and websites, to develop new features of the Services; we may use anonymized aggregated user data to train our algorithms, AI models and AI products and services using AI to develop, improve and provide our Services;
- to conduct research, user feedback surveys, testing, optimization, developing and improving the Services and user experience;
- to prevent fraud, criminal activity and misuses of our Services and websites and to protect the security of our systems and Services;
- to personalize user experience with our Services;

- to verify and process any transactions in relation to payments our users make in connection with the Services;
- to communicate with you, including to send you confirmations, notifications, updates, security alerts, administrative messages and otherwise facilitate the use of our websites and Services;
- to provide you with assistance and customer support;
- to detect, prevent and address technical issues;
- to send you marketing communications and/or newsletters, if you consented to receive them or if we have another valid ground for such data processing;
- to comply with legal obligations and to protect the rights, privacy, safety, or property of our users, us or any third party.

We apply data minimization principles to any data used in AI or analytics, storing it only as long as necessary to fulfill the intended purpose. Data used for AI training is anonymized and periodically reviewed to ensure it remains essential and compliant with applicable regulations.

We will process your Personal Data based on the following legal grounds, depending on the processing activity:

- Consent: you have given us your consent (for example, when you share your details for a particular purpose);
- Contractual necessity: we need it to perform our obligations and/or to exercise our right arising from a contract entered with you;
- Legal obligations: processing of your Personal Data is necessary to comply with legal or regulatory obligations;
- Legitimate interests: processing of your Personal Data is necessary for our legitimate business interests and those of third parties, provided that this does not override any interests or rights that you have as an individual (for example, providing high standards services, responding to your requirements etc.).

We limit the processing of your Personal Data to the scope of purpose for which the Personal Data was collected. In cases where the processing of Personal Data is based on your consent, you have the right to withdraw your consent to such processing at any time, however, it may limit the Services (or a part thereof) offered to you.

## DATA SECURITY

We are committed to protecting the integrity and security of all information collected through our websites and Services. elephantroom attempts to protect your information against the loss, misuse, or alteration. We implement appropriate and reasonable organizational and technical measures to safeguard the collection, transmission, and storage of your Personal Data. These measures vary based on the type of information that we process, the current state of technology, and the resources available to us.

While we implement reasonable measures to protect your Personal Data, we cannot guarantee the absolute security of the information you share with us. Therefore, we encourage you to exercise caution and take proactive steps to protect your information. For example, where you have chosen a password to access your personal account on elephantroom, you are responsible for ensuring that the password is both confidential and sufficiently strong. We recommend using a unique password with a combination of letters, numbers, and symbols to enhance security.

## DATA RETENTION

We store your Personal Data for different time periods depending on the category of Personal Data, on the purposes for which it was collected and pursuant to the applicable laws. We determine how long we need Personal Data on a case-by-case basis, but we are striving to keep your Personal Data for as short a period as possible to achieve the purpose for which Personal Data was collected.

The duration of Personal Data retention period depends on several factors, including:

- Amount, nature and sensitivity of Personal Data;
- Purpose of Processing: we will retain your Personal Data for as long as you have an account with us or keep using the Services;

- Legal Requirements and Legitimate Interest: we will retain your Personal Data to meet legal, regulatory, tax, accounting, reporting obligations (such as maintaining record of transactions) or if it is advisable based on our legal position (such as in relation to statutes of limitations, litigation, or regulatory investigation);
- Potential risk of harm from unauthorized use.

After the elapsing of the retention period as described in this section of the Privacy Policy, we will delete respective Personal Data, unless we are obliged to retain the Personal Data (or a certain part of it) for a longer period in order to comply with obligations deriving from applicable legal acts and / or this data is necessary to resolve legal disputes.

## DATA SHARING WITH THIRD PARTIES

How we may share your Personal Data:

Vendors, Services Providers and Partners: we may share your information with selected third-party service providers who are working with us in connection with the operation of our websites or our Services.

Third-party products and services: we may permit advertisers and their agents to use cookies or related technologies within the websites and Services to store information on or read information from your browser or device, so that they can optimize their advertising campaigns. For more information about use of cookies or related technologies, as well as your rights, please read our [Cookies Policy](#).

Corporate Affiliates and Subsidiaries: we may disclose your Personal Data to our affiliates and subsidiaries, meaning each an entity that controls, is controlled by, or is under common control with elephantroom. Our affiliates and subsidiaries may use the Personal Data we share only in a manner consistent with this Privacy Policy.

Business Transfers: if elephantroom engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of assets, or other strategic transaction or proceeding, or takes steps in anticipation of such activities, some or all Personal Data may be shared or transferred, subject to standard confidentiality arrangements and consistent with this Privacy Policy.

To comply with laws: if we are required to disclose Personal Data in response to a legal proceeding or a lawful request, we may disclose Personal Data if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation, or legal process.

To facilitate our legitimate interests: we may disclose Personal Data to protect and defend the rights, property, or safety of elephantroom, its users, or third parties. This includes enforcing our contracts or policies, investigating and preventing illegal activities, fraud, or security threats, and taking action to prevent harm.

With your consent: we may share your Personal Data for other purposes if you direct us to do so, or if you consent to such sharing.

How you may share your Personal Data and User Contributions:

You may share your Personal Data and User Contributions with other users and third parties both within and outside the Services. Any information that you voluntarily share becomes publicly accessible, meaning it can be read, collected and used by others. For example, this may occur when you set your profile to public, make your User Contributions visible to others, participate in design contests organized by elephantroom, share a link to a created floor plan on social network or with a third party, post comments containing your information on our websites or Services, such information (and your Personal Data contained therein) becomes publicly available.

We ensure that all third-party data processors we engage comply fully with GDPR standards and have adequate measures in place to securely process and protect your Personal Data, pursuant to Data Processing Agreements.

## INTERNATIONAL DATA TRANSFERS

We may transfer your Personal Data to recipients located outside of the European Economic Area, Switzerland or the United Kingdom. If we share your Personal Data with third parties located outside the European Economic Area, Switzerland or the United Kingdom, we take steps to ensure that appropriate safeguards are in place to guarantee the continued protection of your Personal Data, such as relying on the European Commission's adequacy decisions for certain countries, or by entering into the Standard Contractual Clauses adopted by the European Commission (article 46(2)(c) GDPR), which are available [here](#).

## DATA SUBJECT RIGHTS

You have the following rights in relation to elephantroom's processing of your Personal Data, which you can exercise at any time:

Right to access your information: you have the right to inquire if we are processing your Personal Data. If we are, you may request access to this data along with the information on how it is used and stored. Additionally, you are entitled to obtain a copy of your Personal Data we hold about you.

Right to correct your information: you have the right to request us to correct or complete any Personal Data we hold about you that you believe to be inaccurate.

Right to erase your information (right to be forgotten): you have the right to ask us to delete your Personal Data in certain circumstances (for example, if personal data is no longer necessary in relation to the purposes for which it was collected or if you withdraw your consent on which the processing is based). However, please be aware that there are certain exceptions where we may deny your request for erasure, for example, when

the processing is required to comply with legal obligations, or to establish, exercise, or defend legal claims.

Right to restrict processing of your information: you have the right to request us to suspend processing of your Personal Data in certain circumstances (for example, if you think that your personal information is not accurate or incomplete). There are, however, some exclusions when we can refuse your request to restrict processing, such as the case when processing of your Personal Data is necessary to comply with legal requirements or obligations, or for the establishment, exercise or defense of legal claims.

Right to data portability: you have the right to request us to provide your Personal Data to you or to another controller of your choice in a structured, commonly used and machine-readable format, under certain conditions.

Right to object: you have the right to object in cases when we process your Personal Data based on our legitimate interests or public interest; once you object, we will no longer process your Personal Data, unless we demonstrate compelling legitimate grounds for such processing, which override your interests, rights and freedoms, or for establishment, exercise or defense of legal claims.

Rights relating to automated decision-making and profiling: you have the right to object to any decisions made based solely on automated processing of your Personal Data where such decisions have legal effect concerning you or similarly significantly affect you; you can always ask for such automated decisions to be reconsidered.

Right to withdraw your consent: in cases when we process your Personal Data based on your consent, you have the right to withdraw it; withdrawal will not affect the lawfulness of processing before the withdrawal.

You can exercise some of these rights through your elephantroom account. If you are unable to exercise your rights through your account, please submit your request through

info@elephantroom.ai. When you exercise the rights above, we may request you to provide additional information necessary to confirm your identity.

We hope that we are able to address any questions or concerns you may have. If you have any unresolved data privacy complaints with us, you have a right to lodge a complaint with a data protection supervisory authority in particular the Member State of European Union where you reside, where we are based, or where the alleged infringement of data protection legislation took place.

## **CHILDREN**

elephantroom understands the importance of protecting children's privacy, especially in an online environment. Other than as a part of Educational License, we do not knowingly collect personal information from children under 16 years old. If you are under 16 years old or the age of consent in your jurisdiction ("Minor"), you may use our Services and websites only subject to the consent of your parent or guardian, who takes responsibility for your use of our Services and websites.

If you have reasons to believe that a Minor unlawfully provided Personal Data to elephantroom through the Services or websites, please contact us at dpo@elephantroom.ai. We will investigate any notification and if appropriate, delete the Personal Data from our systems.

## **EXTERNAL LINKS**

Our websites, Services and email communications may contain links to the websites or services of others ("Linked Websites"). Please be aware that we are not responsible for, and this Privacy Policy does not apply to, the privacy practices of any Linked Websites or of any companies that we do not own or control. We encourage you to seek and review the privacy notice of each Linked Website to understand how the personal data about you is processed and protected.

## **CHANGES TO THIS PRIVACY POLICY**

To ensure that our Services meet your needs and comply with legal standards, we may introduce changes to this Privacy Policy from time to time. If we make any changes, we will notify you by revising the “Last Modified” date at the top of this Privacy Policy and, in some cases, we may provide you with additional notice (such as adding a statement to our Services or sending you an email notification). We encourage you to periodically review this Privacy Policy to stay informed about how elephantroom processes and protects your personal information.

## **HOW TO CONTACT US**

For any privacy-related queries, please reach us via email at [dpo@elephantroom.ai](mailto:dpo@elephantroom.ai) or by mail at Piazza Garibaldi 5, Sondrio, Italy, 23100.