

AllyWise — summary for the DPO

One page with what you need in order to assess the processing. It does not replace the privacy notice: it comes before it.

Before a B2B sales meeting, AllyWise produces a hypothesis about the counterpart's communication style, drawn from public sources mediated by the user. The counterpart's profile is ephemeral. No special categories of data are processed, there is no emotion recognition, and no automated decision is taken about the person described.

LEGAL BASIS

PROCESSING	BASIS	NOTES
Your seller profile	Consent	Explicit at signup, revocable at any time. It's yours: you see it, correct it, delete it.
Your counterpart's company	Not personal data	Sector, size, stated priorities, tone of communication. Business information from public sources.
Your counterpart as a person	Legitimate interest (art. 6.1.f)	With a written, documented balancing test. Processing is ephemeral and directed at a single imminent meeting.

SPECIAL CATEGORIES (ART. 9 GDPR): FOUR LAYERS

- Filter on the way in.** Signals of special categories present in the sources are not used as analytical input.
- Constraint in the model.** The instructions require profiling communication style only, and prohibit the jump from style to clinical or identity inferences.
- Check on the way out.** Generated text is scanned and blocked before being displayed or saved if it contains references to special categories.
- Non-persistence.** If they surfaced anyway, they are not stored. In any form.

DATA SUBJECT RIGHTS

Access, rectification, erasure, portability, objection.
GDPR articles 15-22, exercisable by writing to an address that answers.

AI ACT (REG. EU 2024/1689)

- No emotion recognition.** In the workplace this is a prohibited practice under art. 5, in force since 2 February 2025, with penalties up to €35 million or 7% of worldwide turnover. We had prototyped a real-time in-conversation assistant: it was not released, and won't be in that form. It isn't a feature we lack — it's a feature we eliminated.
- No manipulative or subliminal techniques.** The method adapts order, emphasis, proof and format. Never the facts. In the product that distinction is binding, not rhetorical.
- Transparency.** We state when content is generated by an automated system and when you're interacting with one.
- Suppliers.** We require AI Act conformity documentation from the model providers we use. The compliance chain doesn't stop downstream.

IN PROGRESS BEFORE COMMERCIAL LAUNCH

- DPO appointment** — In progress
- Impact assessment (DPIA)** — Before launch
- LIA and AI Act file** — Maintained
- Legal validation of sourcing** — In progress

This section lists commitments, not completed work. It is written down because a supplier that declares only the finished parts is one whose gaps you cannot see.