

Privacy Policy

Last updated on: 01.02.2026

1. Introduction

Net Info EAD, UIC: 202632567 (hereinafter referred to as “**Net Info**”) is committed to protecting the personal data of each user of Net Info`s services and ensuring compliance with the General Data Protection Regulation (“**GDPR**”), Bulgarian Personal Data Protection Act and applicable legislation. This privacy policy (“**the Policy**”) describes how Net Info collects, uses, shares and protects users' personal data when using the NEWSBUILD.AI platform, which allows partial automation of the editorial activities of media publishers and related services (NEWSBUILD.AI and related services, hereinafter collectively referred to collectively as “**the Service**”).

For the purposes of this Policy, “Client” is the legal entity/business entity that has entered into a Subscription Agreement for the use of the Service. “User(s)” are the authorized representatives/employees of the Client who use the Service on its behalf and for its internal business purposes, in accordance with the Terms of Use and the Subscription Agreement.

Net Info is the controller of the Users` personal data when it processes data for the creation and management of customer accounts, contractual relations, billing and payments, customer support, security, logs, abuse prevention and (where applicable) marketing communications.

Where the User uses the Service on behalf of Net Info`s Client, and the personal data is contained in the Incoming and/or Outgoing Content (“**Client`s Content**”), Net Info acts as a processor under Article 28 of the GDPR and processes the data only on the basis of documented instructions of the Client. In these cases, the Client is the data controller in the Client Content and the requests of data subjects for such data should be addressed first to the Client and Net Info cooperates under the applicable data processing agreement.

Net Info collects personal data directly from the Users and/or through the Client (for example, when the Client provides a list of authorized persons to access the Service). The provision of certain personal data is necessary in order for Net Info to create and administer an account and provide access to the Service. If this data is not provided, Net Info may not be able to provide access to the Service or certain of its functionalities.

By accessing and using the Service, Users confirm that they have read, understood and agree to the terms and conditions described in this Privacy Policy. This Policy is an integral part of the Terms of Use of the Service and the relevant Subscription Agreement. This Privacy Policy is available at any time on the website of the Service at: www.newsbuild.ai.

The Service is intended for use by legal entities and their authorized representatives/employees and is not intended for persons under 18 years of age. If Net Info finds that it processes personal data of a person under 18 years of age without an appropriate legal basis, it will take reasonable measures to restrict/delete the data in accordance with applicable law.

Contact Details:

- **Data controller:** “Net Info” EAD
- **Contact the Data Protection Officer (DPO):** dpo@netinfo.bg
- **Address:** Sofia, 10 Nedelcho Bonchev Str., Republic of Bulgaria

2. **Information that Net Info collects and processes.**

Net Info collects and processes the following main categories of personal data:

2.1. **Account details.**

This category includes information provided when registering and managing the account, such as:

- (a) Names and professional roles of authorized Users;
- (b) Business contact details, including email address, telephone number, and physical address;
- (c) Payment information and billing data;
- (d) Company registration data and legal status;
- (e) Access logs and records of the activity of the Users.

Net Info collects this data directly from Users during registration, account updates, communication with customer support or when requesting services. In addition, some data is collected automatically through log files when using the Service.

Purpose of processing: Net Info processes this data in order to manage subscriptions, provide customer support, ensure the security of the Service, fulfill contractual obligations and comply with legal requirements.

2.2 **Customer Content - Incoming and Outgoing Content.**

This category covers all content that Users enter, submit, upload, create, or process through the Service, including:

- (a) texts, articles, materials, structured information, metadata and other resources provided by the Client and/or extracted from its systems (“**Incoming Content**”);
- (b) results/output data generated through the Service (e.g., title suggestions, summaries, tags, fact boxes, context, timeline, bio information, encyclopedic information, suggestions

for internal links (including through Retrieval-Augmented Generation - RAG), translations, chat assistant, etc.) (“**Outgoing Content**”).

Purpose of processing: Net Info processes the Client’s Content in order to ensure the full functionality of the Service. This includes generating results through integrated models/tools with artificial intelligence (e.g. ChatGPT API, Gemini API, etc.), processing and organizing content according to the editorial needs of the Client, ensuring the traceability of requests and security of the Service, as well as preventing abuse.

Net Info does not use Client’s Content to train new AI models and does not permit such use by subcontractors within the provision of the Service, to the extent applicable and contractually possible. For the avoidance of doubt, “Service Enhancement” activities are limited to measures such as debugging, enhancing security, monitoring and performance optimization, without using Client’s Content to train new AI models.

With regard to the Client’s Content, Net Info acts as a processor of personal data (Art. 28 GDPR) and processes this data solely on behalf of the Client and in accordance with its documented instructions. Client is responsible for providing a legal basis for processing any personal data contained in Client’s Content, including obtaining consent where necessary, carrying out data protection impact assessments where required, and complying with data minimization and purpose limitation principles.

Net Info does not apply automated decision-making based on artificial intelligence, which gives rise to legal effects or similarly affects to a significant extent natural persons within the meaning of Art. 22 GDPR.

2.3 Technical and consumption data.

In addition to account data and Client’s Content, Net Info automatically collects certain technical data when interacting with the Service. These may include:

- (a) IP address;
- (b) Login details and authentication tokens;
- (c) Browser type and version, time zone setting and location;
- (d) Types and versions of browser plug-ins;
- (e) Operating system, platform and device type;
- (f) Language and screen resolution preferences;
- (g) Device identifiers and session data;

(h) Technical logs/diagnostic information for requests to the functionalities of the Service (e.g. type of functionality, execution time, error codes) to the extent necessary for security, maintenance, prevention of abuse and improvement of the Service.

Purpose of processing: This data is collected to improve the functionality, performance and security of the Service, perform analytics and ensure compatibility with different devices and browsers. In addition, Net Info uses it to detect and prevent abuse and fraud, maintain audit records in accordance with its legal obligations, protect its legitimate interests under Article 6(1)(f) GDPR.

2.4 Special categories of personal data.

Net Info does not require the provision of special categories of personal data (this includes information about racial or ethnic origin, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, state of health, genetic and biometric data). Also, Net Info does not require personal data related to convictions and violations.

It is possible that through the Client`s Content when using the Service, special categories of personal data within the meaning of Art. 9 of the GDPR and/or data related to convictions and violations under Art. 10 of the GDPR (e.g. in the context of journalistic activity). In these cases, the Client (as an administrator of the personal data in the Client`s Content) is responsible to provide a valid legal basis under Art. 6 of the GDPR and an applicable hypothesis under Art. 9 and/or Art. 10 of the GDPR (where applicable), including to comply with the principles of data minimization and purpose limitation. Net Info processes the Client`s Content only on the basis of documented instructions of the Client and within the framework of an applicable data processing agreement.

Where personal data, including special categories of personal data, are processed for the purposes of journalistic activity, as provided for in Article 85 of the GDPR and the relevant provisions of the Bulgarian Personal Data Protection Act, certain rights and obligations under this Privacy Policy and the GDPR may not apply. This exception is valid only when the processing is carried out in the public interest, falls within the context of legitimate journalistic activity and respects the balance between freedom of expression and the protection of individual rights. Where Net Info acts as a processor with respect to Client`s Content, the assessment of the applicability of the journalistic exception is the responsibility of the Client as controller. If a User invokes this exception, the User is solely responsible for ensuring that the use of the Service complies with the requirements for journalistic activity under applicable laws.

3. Legal basis for processing.

Net Info processes personal data of Users on the following legal bases under the GDPR:

(a) Performance of a contract: The processing is necessary for the performance of Net Info's contractual obligations under the Terms of Use and the Subscription Agreement, including the provision of services and account administration (Article 6(1)(b) GDPR).

(b) Legitimate interest: To improve the Service, provide customer support, communicate with Users, send notifications about updates related to the Service, and prevent fraud, provided that the rights and interests of Users are not violated (Article 6(1)(f) GDPR).

(c) Compliance with legal obligations: Processing is necessary to comply with legal obligations, including compliance with tax and accounting requirements, compliance with regulatory and legal obligations imposed by competent authorities. (Article 6(1)(c) GDPR).

(d) Consent: Net Info processes personal data on the basis of consent only where applicable, for example for promotional materials and newsletters. Users may withdraw their consent at any time by adjusting their preferences or by contacting Net Info (Article 6(1)(a) GDPR).

Where Net Info processes personal data as a processor in relation to the Client`s Content, the applicable legal bases for the processing are determined by the Client as the controller, and Net Info processes the data in accordance with the Client`s instructions and the applicable contractual and legal requirements.

4. Data Sharing and Disclosure.

Personal data may be shared with the following parties, subject to appropriate safeguards:

(a) Data processors: Net Info assigns to external providers and partners acting as processors of personal data within the meaning of Art. 28 of the GDPR, to support the maintenance, operation and improvement of the Service. These processors perform specific tasks on behalf of Net Info and may include cloud or payment service providers, customer service systems, analytics and monitoring tools, and services based on artificial intelligence or automation. The latter support functionalities such as generating titles, summaries, tags, extracting key facts, contextualizing topics, suggestions for internal links (including via RAG), translation and chat assistant.

All processing activities are regulated by Data Processing Agreements that Net Info enters into with each processor, in full compliance with the requirements of the GDPR. These agreements clearly define the scope, duration, purpose and nature of the processing and require the processor to act only on documented instructions of Net Info. In cases where processors use sub-processors, they are obliged to obtain the prior written approval of Net Info and ensure that the same contractual obligations are carried over in order to ensure the continued protection of personal data. Net Info assesses security and compliance measures in the selection of processors, including an assessment of their security measures, privacy policies, and regulatory compliance.

Particular attention is paid to AI-based and automation-based tools integrated into the Service to ensure that such technologies do not involve automated decision-making leading to legal or significant consequences for individuals, without the implementation of adequate safeguards – such as human supervision or additional user controls.

An up-to-date list of data processors on behalf of Net Info and authorized sub-processors is available upon request, in view of applicable privacy considerations.

(b) Law enforcement and regulatory authorities: To comply with legal obligations, respond to lawful requests or subpoenas, participate in judicial or administrative proceedings, and in cases where disclosure is necessary to protect Net Info`s legal rights or to defend against legal claims.

(c) Business transfers: In the event of a merger, acquisition, restructuring or sale of assets, it is possible that data may be transferred as part of the relevant transaction. Appropriate safeguards, including contractual commitments, will be applied in such processes to ensure adequate protection of personal data.

(d) Third-Party Platforms: If a User decides to publish, share or export content from the Service to a third party - such as social networks or cloud storage providers, then he does so at his own risk. These third-party platforms act as independent data controllers, which means that they themselves determine how they process personal data of Users. Their privacy policies, terms of use, and security practices may differ significantly from those of Net Info.

Net Info does not control, participate, and is not responsible for how third-party platforms collect, use, store, or protect Users` personal data. Once content has been shared, its post-processing is entirely governed by the policies of the respective platform. Before sharing content, Net Info recommends that Users carefully review the privacy policies, data processing practices and security measures of the respective external service. Users are responsible for ensuring that the information they share is in compliance with the GDPR, Bulgarian legislation in the field of personal data protection and other applicable regulations. If the content includes personal data or sensitive information, Users should ensure that they have the necessary permissions, consents and legal grounds for such sharing.

Net Info recommends that Users exercise caution when sharing personal data or confidential information through external platforms, as Net Info cannot guarantee how this data will be processed after leaving the Net Info ecosystem.

(e) Other situations: With the explicit consent of the User, Net Info may share information with third parties for specific purposes for which the User authorizes him. In cases where required by applicable law or where disclosures are necessary to protect the rights, safety, or property of Net Info`s customers, employees, or the public, the information may be provided.

5. **Data security**

Net Info implements appropriate technical and organizational security measures to protect personal data, including:

(a) Encryption: Data encryption.

(b) Access control: Use two-factor authentication (2FA) and strict role-based access control.

(c) Regular security checks: Conducting periodic penetration tests, vulnerability scanning, and risk assessments.

(d) Data loss protection: Maintain measures to prevent and recover from data loss.

(e) Incident Response Plan: In the event of a personal data breach, Net Info immediately activates a response plan. Where applicable, Net Info shall notify the competent supervisory authority without undue delay and, where possible, no later than 72 hours of becoming aware of the violation, pursuant to Art. 33 of the GDPR. Where the breach is likely to give rise to a high risk to the rights and freedoms of natural persons, Net Info shall notify the data subjects concerned without undue delay, pursuant to Art. 34 of the GDPR. The notification shall contain information on the nature of the breach, the categories of data affected, the potential risks and recommended actions to mitigate the consequences. Where required, Net Info will assist the competent supervisory authority and take the necessary measures to limit and remedy the consequences of the breach. Where applicable, Net Info will communicate via email or other available contact channels.

6. Data storage.

Net Info stores personal data only for the period necessary to achieve the purposes set out in this Policy or as required by applicable law:

(a) Account Data: They are stored for the period of the User`s active subscription, as well as if necessary to comply with regulatory requirements.

(b) Client`s Content (Incoming and Outgoing): Net Info processes this content only to the extent necessary to provide the Service. Outgoing content on specific requests to the Service (e.g. for translation, title suggestions, summary, etc.) is not stored for a long time and may be deleted within a short period after generation/termination of use, unless longer storage is necessary for legal obligations, security or legal claims.

(c) Technical/Cookie Data: Technical data for user account logins is normally stored for up to 6 months (unless a longer period is necessary for security, establishment/protection of legal claims or fulfillment of a legal obligation), in accordance with the applicable requirements of the Electronic Communications Act and relevant legislation.

(d) Financial data: Certain data, such as payment records, invoices and billing data, is stored for accounting purposes, tax compliance and financial audits, in accordance with applicable regulations. This data is stored securely for up to five (5) years after the termination of the account or the completion of the relevant financial transaction, unless a

longer period is required by law. After this period, the data is deleted or anonymized unless it is necessary for the fulfilment of current legal obligations or dispute resolution.

(e) Automated retention schedules: The data is reviewed periodically and automatically deleted when it is no longer needed for the specified purposes.

7. Users` rights.

7.1 As data subjects, the Users have the following rights in relation to the processing of their personal data:

(a) Right of access: Users have the right to receive confirmation whether Net Info processes personal data about them and, if so, access to them, including information regarding the purposes of processing, categories of data, recipients and storage period.

(b) Right to rectification: If a User finds that his personal data is inaccurate or incomplete, he has the right to request their correction without undue delay.

(c) Right to erasure (“right to be forgotten”): Users may request the erasure of personal data for any of the following reasons: (i) the data is no longer necessary for the purposes for which it was collected; (ii) consent has been withdrawn (where the processing is based on consent); (iii) in the event of an objection to the processing and the absence of legal grounds to prevail; (iv) the data have been processed unlawfully; (v) deletion is necessary to comply with a legal obligation. This right is subject to limitations where there are legal or regulatory grounds for further storage.

(d) Right to restriction of processing: Users have the right to request a temporary restriction of processing in the following cases: (i) in case of disputing the accuracy of the data - for the period necessary for verification; (ii) the processing is unlawful and instead of deletion, restriction is requested; (iii) Net Info no longer needs the data, but the User requires it to establish, exercise or defend legal claims; (iv) in case of objection to the processing - pending verification of whether the legitimate interests of Net Info prevail.

(e) Right to data portability: Users have the right to receive their personal data in a structured, commonly used and machine-readable format, as well as to transmit it to another controller when: (i) the processing is based on consent or contract; and (ii) is carried out in an automated manner.

(f) Right to object: Users may object at any time to the processing of personal data about them when it is based on a legitimate interest, including profiling. In such a case, Net Info will cease processing unless it proves compelling legal grounds that prevail or if it is necessary to establish, exercise or defend legal claims.

(g) Right to withdraw consent: If the processing of the data is based on consent, the Users have the right to withdraw it at any time, without affecting the lawfulness of the processing carried out before the withdrawal.

(h) Rights related to automated decision-making, including profiling: Users have the right not to be subject to a decision based solely on automated processing, including profiling, when it produces legal effects for them or significantly affects them. This does not apply where: (i) the decision is necessary for the conclusion or performance of a contract; (ii) explicit consent has been given; (iii) the processing is permitted by legal measures to protect rights and interests.

7.2 Exercise of User`s rights

If a User wishes to exercise any of his rights, he should contact Net Info at dpo@netinfo.bg. Net Info will consider and respond to each inquiry within one (1) month of its receipt. If it is necessary to extend this period (e.g. due to complexity or number of submitted requests), the User will be informed in a timely manner, and Net Info will indicate the reason and the expected deadline for response.

To protect the User`s privacy, Net Info may require additional information in order to confirm the User`s identity before processing the request.

Where a data subject`s request relates to personal data included in the Client`s Content, the Client is the data controller and is the main party to respond to the request. Net Info as a processor will assist the Client in fulfilling its obligations under the GDPR, subject to the terms of the applicable data processing agreement.

If the User considers that Net Info does not respond appropriately to a request, the User has the right to file a complaint with the competent supervisory authority for personal data protection in the relevant jurisdiction.

8. International data transfers.

In the course of providing the Service, personal data may be transferred to, accessed from or processed in countries outside the Republic of Bulgaria and the European Economic Area (EEA), including in jurisdictions that may not provide an equivalent level of personal data protection in accordance with EEA standards.

All such transfers shall be made in full compliance with the provisions of Chapter V of the GDPR. Net Info guarantees the application of appropriate safeguards, pursuant to Article 46 of the GDPR, in order to ensure an adequate level of protection of personal data. These measures include, but are not limited to:

- (a) Standard contractual clauses approved by the European Commission that bind the recipient to contractual obligations to protect data;
- (b) Adequacy decisions issued by the European Commission under Art. 45 of the GDPR, where applicable;
- (c) Additional technical and organisational measures, such as encryption, pseudonymisation and access control, where necessary.

Where applicable, Net Info conducts transfer impact assessments to assess the legal environment and risk associated with the recipient's country, especially with regard to access by public authorities and redress mechanisms.

Users are informed that international transfers of personal data may take place in the provision of the Service subject to appropriate safeguards in accordance with Chapter V of the GDPR as described above. In the event of material changes in the transfer mechanisms or jurisdictions, Net Info will provide a notification in accordance with the "Changes to this Policy" Section.

9. Data Protection Impact Assessments (DPIAs).

Where necessary, Net Info conducts DPIAs to assess and mitigate risks associated with data processing, especially when processing on a large scale, when processing special categories of data through the Client's Content and/or when introducing new AI functionalities that may increase the risk to the rights and freedoms of data subjects.

10. Using AI and automated processing in NEWSBUILD.AI.

Net Info may integrate artificial intelligence (AI) and machine learning technologies into the Service to support and improve the editorial processes of media publishers. These tools can be used for purposes such as, but not limited to:

- (a) suggestions for article titles according to the topic and editorial style;
- (b) a summary (a brief overview of the main highlights);
- (c) tags and metadata;
- (d) extraction and structuring of key facts (fact box);
- (e) contextual/historical information on a topic;
- (f) suggestions for internal links (including via RAG);
- (g) a chronological line;
- (h) biographical references (Bio Box) and encyclopedic information;
- (i) translation and chat assistant.

The AI-based features integrated into the Service are designed to assist Users by increasing efficiency, accuracy and content handling capabilities. The processing carried out through these tools does not involve automated decision-making, which entails legal or other material consequences for data subjects within the meaning of Article 22 of the GDPR.

Users should be aware that the generated Outgoing Content may contain inaccuracies or incompleteness. The Service is designed to support editorial processes, and the results are subject to human review and editorial control by the Client/Users, in accordance with the Terms of Use.

In cases where AI-based functionality could have a material impact on individuals or on content results, one or more of the following safeguards will be applied: i) providing human oversight or review of results, ii) introducing additional technical and organizational protection measures, iii) clearly designating and explaining the relevant AI functionality in the interface of the Service.

If features that perform fully automated decision-making are introduced in the future, Net Info will update this Privacy Policy and apply all safeguards provided for by the GDPR, including ensuring human intervention, the right to express an opinion, challenging the decision and opt-out mechanisms.

11. Cookies and similar technologies

Net Info uses cookies and similar technologies (including local storage, web beacons, and SDKs) to collect and store certain technical information when interacting with the Service. These technologies support the provision, protection, and optimization of the Service, as well as the personalization of the user experience. Cookies are small text files that are stored on Users’ devices when visiting a website or using an online service. They enable the recognition of devices, the storage of user preferences, and the improvement of the functionality and performance of the Service.

Net Info uses the following categories of cookies:

- (a) Strictly necessary cookies: These cookies are essential for the proper operation of the Service. They allow basic functions such as navigation, secure login, and access to secure areas. Due to their critical role, these cookies do not require consent.
- (b) Performance and analytics cookies: These cookies collect information about how Users interact with the Service, such as which pages are visited most often, error messages, and load times. This information helps analyze and improve functionality and performance. Cookies can be placed by Net Info or by third-party providers of analytical services.
- (c) Functional cookies: Allow the Service to remember choices and preferences (such as language settings or recently used content) to provide an improved and personalized experience.

Where required by law, Net Info will require explicit consent before placing or accessing any non-essential cookies on the Users` devices. Users can manage their cookie preferences at any time through the cookie banner or through the settings of their browser.

Below is a detailed list of cookies that Net Info uses:

COOKIES	Objectives	Deadlines	Saved data
cf_clearance	Prevention of repeated validation of Philips per person	sessional	A set of IP address, user-agent, and session in a hashed

			string
csrftoken	Token for the prevention of unauthorized requests	sessional	Writes XSRF token to the POST request
webui_user_email	Visualization in the interface	sessional	User-entered email address when registering
webui_user_fullname	Visualization in the interface (profile page)	sessional	Name from a system profile

12. Right to lodge a complaint.

If a User believes that his/her personal data has been processed in violation of the applicable data protection legislation, he/she has the right to file a complaint with a competent supervisory authority. In the Republic of Bulgaria, the relevant authority is: Commission for Personal Data Protection (CPDP).

- Address: 2 Prof. Tsvetan Lazarov Blvd., 1592 Sofia, Bulgaria
- Уебсайт: <https://cpdp.bg/>

13. Changes to this Policy.

This Privacy Policy may be updated from time to time to reflect changes in legislation, technological requirements or internal practices of Net Info regarding the protection of personal data. The updated version of the Policy will always be published on the website of the Service.

In case of material changes in the content of the Policy (e.g. change in the purposes of processing, categories of data, legal basis or rights of data subjects), Users will be notified through appropriate communication channels.

Continued use of the Service after the posting of the changes will be considered acceptance of them.

14. Contact.

If there are questions, comments or concerns about this Privacy Policy or the processing of personal data, Users should contact Net Info at: dpo@netinfo.bg