Privacy Policy

Prometheon Website & Services

text(style: “italic”)[Privacy Policy - Version 1.2 - Effective from 04-03-2026]

1. 🇬🇧 Privacy Policy

Version: 1.2 • **Effective Date:** 04-03-2026

1.1. Who are we?

Prometheon B.V.

Address: Woudselaan 12D, 2635 CH Den Hoorn, The Netherlands

CoC (KvK): 99618621

VAT: NL869063674B01

Email: **info@prometheon.ai**

Prometheon acts as the data controller for personal data processed via our website and business communications. For our **Theon product**, a separate explanation applies below.

1.2. What data do we process via the website?

- **Contact & demo requests:** name, (work) email, company, phone number, message.
- **Support/customer communication:** name, (work) email, content of your message(s).
- **Newsletter:** email address (processed via our own, self-hosted Mautic system; no data is sent to external Mautic servers).
- **Recruitment (optional):** CV/application data you provide.
- **Server logs:** IP address, browser type, and timestamps (automatically collected by our hosting providers for security and website operation).
- **Analytics (Google Analytics):** we use **Google Analytics** to measure and improve the use of our website. This involves processing your (anonymized) IP address, device and browser data, visited pages, and click behavior. These cookies are only placed after your consent via the cookie banner.

1.3. Purposes & legal bases (GDPR Art. 6)

- **Lead follow-up & demos:** legitimate interest or pre-contractual phase (Art. 6(1)(f)/(b)).
- **Contract/customer relationship:** performance of a contract and communication (Art. 6(1)(b)).
- **Newsletter:** consent (Art. 6(1)(a)).
- **Recruitment:** consent or legitimate interest + retention periods (Art. 6(1)(a)/(f)).
- **Security & fraud prevention:** legitimate interest (Art. 6(1)(f)).
- **Website analytics (Google Analytics):** your consent via the cookie banner (Art. 6(1)(a)). You can withdraw or adjust this consent at any time.
- **No automated decision-making:** We do not use automated decision-making or profiling that produces legal effects for website visitors.

1.4. Retention periods

- **Leads: 12–24 months** after last contact.
- **Support/contract communication:** duration of the relationship + **max. 2 years**.
- **Job applications: 4 weeks** after completion; **1 year** with consent.
- **Log files/security:** as short as possible and in accordance with legal obligations.

1.5. Recipients and (sub)processors

We only share site data with parties necessary for hosting (such as Netlify), email, and analytics. We conclude **data processing agreements** and keep processing within the **EEA** where possible. For Google Analytics, data processing by Google may take place outside the EU (e.g., in the US). In that case, Google uses **Standard Contractual Clauses (SCCs)** and additional safeguards. Please refer to the privacy policy of Google and Google Analytics for more details.

- **Legal obligations:** We may share data with public authorities if required by law, such as a court order, or to protect our legal rights.

1.6. Cookies

We use different types of cookies:

- **Essential cookies:** necessary for basic functionality (e.g., session management, security).
- **Preference cookies (if applicable):** to remember your settings.
- **Analytical cookies (Google Analytics):** to gain insight into the use of our website and to improve it.

Google Analytics places cookies that give us insight into visitor flows, traffic sources, and page views. We have configured Google Analytics to be as privacy-friendly as possible (IP anonymization activated, no use of advertising features). These cookies are only placed if you consent via the cookie banner. You can always adjust your preferences or block Google Analytics via your browser or Google's available opt-out options.

1.7. Security (TOMs – Art. 32 GDPR)

TLS for transport, strict access control (least privilege), logging, patch policy, encryption where appropriate, and internal procedures for incident response.

1.8. Your rights

You have the right to access, rectification, erasure, restriction, data portability, and objection.

- **Withdraw consent:** You have the right to withdraw previously given consent at any time.
- **Direct marketing:** You have the absolute right to object to the processing of your data for direct marketing purposes (such as our newsletter) at any time, **without providing any justification**.

Send your request to **info@prometheon.ai**. We will respond within **two weeks**.

1.9. Complaints

Dissatisfied? Please email us first. You can also file a complaint with the Dutch Data Protection Authority (**Autoriteit Persoonsgegevens**).

1.10. Changes

We may update this statement. You can find the version and date at the top.

Product privacy: Prometheon Theon (on-prem / in-house)

Theon is designed as a **private/on-prem** AI platform. By default:

- **No egress/telemetry by default** and **no training outside the customer environment**.
- **Data and logs remain local** with the customer; Prometheon has **no access**, unless explicitly and temporarily authorized for support.
- **Updates offline** via **digitally signed packages** (hash verification, rollback options).
- **Encryption at rest** (by the customer environment) and **mTLS/in-cluster encryption** where applicable.
- **RBAC/least-privilege** and optional **CMEK** (customer-managed encryption keys).
- **Export guarantee:** upon termination, export functionality remains available within a reasonable timeframe.

Roles under the GDPR: the **customer is the data controller** for data processed via Theon. Prometheon is **not a recipient** of customer data in normal operation. Only if remote support may touch **personal data**, we sign a **DPA in advance** (see /theon/dpa). Questions about Theon and privacy? Email **info@prometheon.ai**.