



AI WEARS — Webapp legal documents (EN)

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Privacy Policy

PRIVACY POLICY

1) Roles (Controller/Processor) For account, billing, security and support data, AISEM SRL is Controller. For customer-uploaded/generated content (garments/models, AI outputs), AISEM SRL acts as Processor under Art. 28 GDPR. The DPA is integrated into these Terms.

2) Categories of data • Account: first/last name, email, password/SSO, user ID.

- Contract/billing: company name, VAT/tax ID, billing address, transactions (Stripe).
- Content: uploaded images (garments/models), generated images, technical metadata (size, format).
- Technical/usage: access logs, essential app events (e.g., sign_up, generation_success), IP/UA (pseudonymised/aggregated).
- Support: tickets/emails, attachments.
- Security: security events, audit logs, anti-abuse.

3) Purposes & legal bases (Art. 6 GDPR) SaaS provision (Contract); Payments/tax (Legal obligation); Support/service messages (Contract/Legitimate interest); Security/anti-abuse (Legitimate interest); Product improvement (aggregated telemetry without profiling – Legitimate interest); AI training only with user opt-in.

4) Transparency & EU AI Act The system generates synthetic images for e-commerce visualisation. No biometric identification, sensitive categorisation, scoring or decisions producing legal effects. Limited/minimal risk use case: we apply transparency duties (e.g., “AI-generated image”, C2PA/IPTC/XMP metadata where available). We keep technical documentation, risk assessments, governance, security-by-design, and human-in-the-loop for critical processes, updated per guidance/implementing acts.

5) Recipients & sub-processors Payments: Stripe (EU/US). Infrastructure: EU/EEA cloud; any extra-EEA transfers covered by SCC/DPF; CDN; image storage. Transactional email: Postmark / Microsoft 365 (EU/US). Essential telemetry: GA4 in Consent Mode v2 with ad_storage='denied' and analytics_storage='denied' by default. Sub-processor list in Annex A. Transfers outside the EEA rely on SCCs and, where applicable, the EU-US DPF.

6) Retention Account: contract term + 24 months. Invoices/transactions: 10 years. Uploaded content/outputs: 180 days (deletable by the user; backups purged within 30 days). Security/access logs: 12 months. Support tickets: 24 months.

7) Data subject rights Access, rectification, erasure, restriction, portability, objection; consent withdrawal at any time. Requests to info@aiwears.it. You may lodge a complaint with the Italian Data Protection Authority (Garante).

8) Security Encryption in transit/at-rest, RBAC, least privilege, audit trail, hardening, vulnerability management, backups with limited retention, monitoring/alerting, data breach response (Arts. 33–34 GDPR).

9) Minors The Platform is not intended for minors. Uploading images of minors is prohibited without a proper legal basis (Italy: minimum age 14).



10) Changes We will publish updates; material changes will be notified in-app/by email.