

Deventura Privacy Policy

Effective Date: 1 July 2025

This Privacy Policy explains how Deventura AB (“Deventura,” “we,” “our,” or “us”) collects, uses, shares, and protects your personal data in accordance with the **EU General Data Protection Regulation (GDPR)** and other applicable data protection laws.

1. Roles and Responsibilities

Depending on how you interact with our platform, we may act as:

- **Data Processor** when processing performance data on behalf of our customers (e.g. developer data from Git repositories). In these cases, our customer is the **data controller**.
- **Data Controller** when processing data related to your account, support inquiries, job applications, and service usage.

2. Information We Collect

Information You Provide

- **Account Data:** Name, email, company name, and role
(Legal basis: Art. 6(1)(b) – contract)
- **Team Information:** Developer names, roles, and team structure
(Legal basis: Art. 6(1)(f) – legitimate interest)
- **Repository Access:** Git repository URLs and access tokens (read-only)
(Legal basis: Art. 6(1)(b) – contract)
- **Support and Communication Data:** Messages sent via email or chat, feedback, and correspondence

(Legal basis: Art. 6(1)(f) – legitimate interest)

Information Automatically Collected

- **Git Metadata:** Commit hashes, merge request data, timestamps
(Legal basis: Art. 6(1)(b) – contract)
- **Performance Metrics:** Code quality scores and activity analytics
(Legal basis: Art. 6(1)(f) – legitimate interest)
- **Platform Usage:** Interaction data, feature usage, session behavior
(Legal basis: Art. 6(1)(f) – legitimate interest)
- **Technical Data:** IP address, browser type, device type
(Legal basis: Art. 6(1)(f) – legitimate interest)

3. How We Use Your Information

We use personal data to:

- Deliver and maintain our services
- Analyze developer performance and provide insights
- Offer personalized coaching recommendations
- Communicate with you regarding your account or support requests
- Monitor usage and improve our platform
- Detect and prevent fraud or misuse
- Fulfill legal or contractual obligations

4. Data Security

- **Encryption:** All data is encrypted in transit and at rest
- **No Code Retention:** We **do not store** your source code or code diffs after analysis

- **Access Control:** Strict access policies and authentication mechanisms
- **Hosting:** Data is hosted on secure infrastructure via **Google Cloud Platform**
- **Audits:** Regular internal and external security assessments

5. Data Retention

We only retain personal data as long as necessary to:

- Provide the Service
- Comply with legal obligations
- Enforce agreements or resolve disputes

Retention periods include:

- Account data: Deleted within **60 days** of account termination
- Support communications: Retained up to **12 months**
- IP logs and technical data: Retained for **60 days**
- Job applications: Retained for **6 months** after application closure (unless longer retention is consented to)
- Aggregated and anonymized data may be retained indefinitely for analytics purposes

6. Sharing of Data

We **do not sell, trade, or rent** your personal data.

We only share data with:

- **Service Providers:** Trusted vendors with signed Data Processing Agreements
- **Legal Entities:** When required to comply with legal obligations
- **Business Transfers:** In the event of a merger or acquisition
- **With Consent:** If you explicitly agree to sharing for specific purposes

Our Subprocessors

- **Google Cloud Platform** – Infrastructure & storage
- **Anthropic Claude** – LLM-based code analysis (no retention of data)

All subprocessors are subject to confidentiality and data protection obligations.

7. International Data Transfers

If your data is transferred outside the EU/EEA, we ensure:

- **Standard Contractual Clauses (SCCs)** are in place
- Adequate safeguards are implemented to protect your rights

8. Your Rights Under GDPR

Depending on your location, you may exercise the following rights:

- **Access** – Request a copy of your personal data
- **Rectification** – Correct inaccurate or incomplete information
- **Erasure** – Request deletion of your data (“right to be forgotten”)
- **Restriction** – Limit how your data is used
- **Portability** – Request a portable version of your data
- **Objection** – Object to processing under legitimate interests

To exercise any of your rights, email us at privacy@deventura.com. Identity verification may be required.

9. Website, Cookies, and Contact Forms

When you visit our website:

- **Data Collected:** IP address, browser type, device, cookies, page interactions
(Legal basis: Art. 6(1)(f) – legitimate interest)

We use cookies for:

- Site functionality
- Analytics and performance
- Security

You can manage cookies via your browser settings.

If you contact us via a web form:

- Your message and contact details will be processed to answer your inquiry
(Legal basis: Art. 6(1)(b) or (f))

10. Job Applicants

If you apply for a position at Deventura:

- **Data Collected:** Name, contact info, CV, application content
- **Purpose:** Recruitment and hiring process
- **Retention:** Data is deleted after 6 months unless legal claims arise or you consent to extended retention
(Legal basis: Art. 6(1)(b) and (f))

11. Contractors and Suppliers

We process business contact and contract-related information for external vendors, freelancers, or partners.

- **Purpose:** Fulfilling contractual and legal obligations

- **Retention:** As required by contract or law
(Legal basis: Art. 6(1)(b) and (f))

12. No Sale of Personal Data

We do **not sell** any personal data, including as defined under the **California Consumer Privacy Act (CCPA)** or other global privacy laws.

13. Changes to this Privacy Policy

We may update this Privacy Policy to reflect legal, technical, or business changes. We will notify you by posting the updated policy on our website and updating the “Effective Date” above. For material changes, we may notify you by email or platform notification.

Contact Information

If you have questions about this Privacy Policy or your personal information, please contact us:

Email: privacy@deventura.com

Data Protection Officer: dpo@deventura.com

General Inquiries: info@deventura.com