01 / OUR APPROACH

# EU privacy & GDPR overview

Clear information. Less retained data. A considered European launch.

TalkTool Europe is being built for businesses that want live translation with clear control over their information. Our approach combines a separate European application, minimal conversation storage and documented provider responsibilities.

### 01 European application infrastructure

The EU website, primary application database and temporary application state are hosted in Frankfurt, separately from the original TalkTool application.

### 02 Conversations stay temporary

TalkTool does not save recordings or transcripts from the current browser demo. The planned EU call service also has recording and transcript persistence disabled.

### 03 Control for your workspace

Workspace access is tied to organization membership. Administrators can download stored workspace settings, the member directory and usage records from the dashboard.

### The voice demo available today

The optional browser demo uses Soniox's EU regional project and endpoints for speech recognition, translation and voice generation. It starts after your processing acknowledgement and microphone permission. Press Stop to end the session; sessions are capped at 60 seconds. Use sample conversations without personal or sensitive information. EU customer phone calling is not yet enabled.

## Who is responsible for your information?

CareRates LLC dba TalkTool, a California business, operates TalkTool Europe. We are responsible for our own account, demonstration and business administration activities. For the planned business call service, the customer normally determines why its calls are processed and TalkTool acts on its documented instructions. The customer agreement will define the applicable roles and processing details.

## A documented provider relationship

Our provider register records purposes, locations, agreement evidence and outstanding confirmations. Fly's DPA has been signed and returned. Soniox's signed DPA and subprocessor list are retained, with coverage and scope questions under review. A submitted request alone is not shown as an approved control.

This overview describes the current service and our intended EU launch position. Provider requests are progressing toward approval; items marked planned or awaiting confirmation take effect only after confirmation and testing. This document is not a GDPR certification or a signed customer data processing agreement (DPA).

02 / DATA LOCATIONS & PROVIDERS

# Where your information goes

Current services and the planned EU call service are listed separately below.

| PROVIDER / PURPOSE | LOCATION | AGREEMENT & STATUS |
|---|---|---|
| **Fly.io**<br>Application hosting and network traffic | Frankfurt application server | DPA signed and returned. Account coverage, log and retention details awaiting confirmation. |
| **MongoDB**<br>Workspace settings and stored usage records | Frankfurt primary database | Separate database with restricted access. Account agreement review and recovery arrangements in progress. |
| **Upstash Redis**<br>Temporary state and abuse prevention | Frankfurt application state | Fly-managed service. Backup locations, expiry and agreement coverage awaiting confirmation. |
| **Clerk**<br>Sign-in, sessions and organization membership | United States identity processing | Separate EU app identity configuration. Published DPA reviewed; account and deletion details awaiting confirmation. |
| **Soniox**<br>Speech recognition, translation and voice generation | EU regional speech endpoints | EU endpoints verified. Signed DPA retained; legal-entity coverage, processing roles and transfer wording under review. |
| **Twilio**<br>Planned phone connections and call routing | Ireland voice processing planned | Regional routing and carrier data flows must be verified before customer calls are enabled. |
| **Google Workspace**<br>Business email and privacy enquiries | No EU-only email residency commitment | Email is handled through our business mailbox. Agreement and retention review remains in progress. |

## European hosting and international processing

European servers do not mean every provider or copy of data stays in the EU. Clerk identity processing and access by our US business involve international processing. Soniox account, usage and billing data may be processed outside the EU; its DPA also allows limited processing elsewhere for operation, security or support. We are clarifying that scope and documenting applicable DPAs and transfer safeguards, including Standard Contractual Clauses or an applicable adequacy framework. Ask for the confirmed processing schedule before onboarding.

03 / RETENTION & YOUR CHOICES

# Your data. Your choices.

## What we keep, and for how long

| | |
|---|---|
| **Demo audio and conversation text** | No TalkTool recording or persistent transcript storage. Displayed text remains on your device until cleared, replaced by another test or the page is closed. |
| **Demo security controls** | Daily counters use a protected hash of your IP address and expire within 48 hours of the last update. Short-lived session tokens and used-token markers expire within two minutes. |
| **Workspace and identity records** | Stored to operate your account. Contact us about access, correction or deletion. Automatic account closure and provider backup expiry are still being finalized. |
| **Planned call and usage records** | Configured retention is 30 days for minimal call records and 90 days for usage receipts. These settings apply to the planned call service and require live validation. |
| **Backups and provider records** | Managed MongoDB backups are not enabled. Recovery procedures and provider log/backup locations and retention are being finalized; no blanket backup-expiry promise is made. |

## Your choices and privacy requests

Email quinn@usetalktool.com to request access, correction, deletion or restriction, and where applicable portability or objection. You can also withdraw consent where processing relies on it and complain to your data protection authority. Tell us which account or workspace is involved; do not send passwords, API keys or call recordings.

We verify identity and authority proportionately. Where a business customer controls the call data, we help route the request to that customer. The GDPR normally requires a response within one month; where a permitted extension is needed, we must explain it within that month. The dashboard export is an immediate workspace tool; other requests are handled through our privacy contact.

## Our intended position for EU customer launch

We are preparing for positive provider confirmations and a launch with agreed processing terms, verified EU speech and phone routing, documented international transfers, tested retention and recovery, and clear notices for everyone joining a translated call. These are launch commitments under preparation, not statements that every step is complete today. Sensitive or regulated use cases need a separate assessment before support is agreed.

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EDPB: international data transfers / EDPB: individual rights / Soniox: data residency / Clerk: data processing addendum