

Privacy Policy

Applies to the customer support chatbot and to support messages sent by SMS/MMS.
Effective date: 8 September 2026 · Last updated: 8 September 2026 · Version 1.0

This Privacy Policy explains how **727 SRLS** collects, uses, shares and protects personal information when you use our customer support chatbot, including when we exchange support messages with you by SMS/MMS text message.

Key text messaging disclosures

- **We do not share mobile numbers.** No mobile information will be shared with third parties or affiliates for marketing or promotional purposes.
- **Message frequency varies** and depends on your own use of the support service. The chatbot is conversational: we normally reply only when you write to us.
- **Message and data rates may apply.**
- Reply to opt out at any time, or for assistance.

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1. Who we are

The data controller for the processing described in this policy is:

727 SRLS — società a responsabilità limitata semplificata (S.r.l.s.)

Registered office: Via Odoardo Tabacchi 3, 20136 Milano (MI), Italy

VAT number and tax code: 13678980965 · REA: MI-2738292

Website: <https://727.services>

Privacy contact: privacy@727.services · Support: support@727.services

Certified email (PEC): 727srls@pec.it

Where we handle support data on behalf of a client organisation under a written services agreement, that organisation is the data controller and we act as its processor. In that case, the organisation's own privacy notice also applies to you, and this policy describes how we handle the data as processor.

2. Scope of this policy

This policy covers the customer support chatbot (the "**Service**") that we make available inside the custom software we develop for our client organisations, and the two-way support conversations delivered through it, including SMS/MMS text messages.

The Service is provided for **internal business use**: it is made available to the employees, staff and other authorised users of organisations that have signed a contract with us. It is **not** a consumer marketing programme. We do not use it to send advertising, promotional or bulk marketing messages, and we do not purchase, rent, or import mobile phone number lists.

3. Information we collect

Category	Examples	Where it comes from
Contact data	Name, business email address, mobile phone number, employer / client organisation	Your organisation, or you when you start a conversation
Support conversation content	The messages you send to the chatbot, our replies, ticket descriptions, screenshots or files you attach	You
Account and software data	User ID, role, product or licence configuration relevant to your request	Your organisation, our systems
Technical and delivery data	Timestamps, message identifiers, carrier delivery receipts and delivery status, IP address, device and application logs	Automatically, and from our messaging provider
Consent and opt-out records	Reference to the signed contract authorising support messaging, and your STOP / START history	Your organisation, you

We do not seek to collect special categories of personal data. Please do not send passwords, payment card numbers, health information or other sensitive data through the chatbot or by text message.

4. How and why we use it

Purpose	Legal basis (GDPR Art. 6)
Answering product and service enquiries, account questions, troubleshooting and support requests, and providing general guidance	Performance of a contract; our legitimate interest in supporting our clients' authorised users
Sending you conversational support messages by SMS/MMS in reply to your request	Performance of a contract; consent documented in the agreement signed by your organisation and confirmed when you start the conversation
Routing your request to the right team and escalating it to a human specialist	Performance of a contract; legitimate interest
Quality assurance, diagnosing faults and improving the reliability of the Service	Legitimate interest (using aggregated or pseudonymised data where practicable)
Security, abuse prevention and protecting our systems and users	Legitimate interest; legal obligation
Keeping records of consent and of opt-out requests, and complying with telecommunications and other legal requirements	Legal obligation

The chatbot uses automated processing to interpret your request and to draft responses. It does not make decisions that produce legal effects concerning you or similarly significantly affect you, and you can ask to be transferred to a human at any time. We do not use your personal information for advertising, and we do not sell it.

5. Text messaging (SMS) disclosures

5.1 How we obtain your number and your consent

We receive your mobile number from the client organisation that engaged us, under the written contract it has signed with us; that contract states that support may be provided by text message, and your organisation is responsible for informing you of it. In practice, **every messaging conversation is started by you**: we reply to the messages you send us. We never buy, rent, or import phone number lists, and we do not send unsolicited messages.

5.2 Message frequency

Message frequency varies and depends entirely on your own use of the support service. Because the Service is conversational, you normally receive a message only in reply to one you have sent. As an indication, a typical support conversation involves approximately 2–10 messages, and many users receive no messages at all in a given month.

5.3 Cost of messages

Message and data rates may apply. Any charges for sending or receiving text messages are set by your mobile carrier and are your responsibility. Please check your mobile plan for details.

5.4 Opting out and getting help

You can stop receiving text messages from us at any time by replying **STOP** (or **STOPALL**, **UNSUBSCRIBE**, **CANCEL**, **END**, **QUIT**) to any message. We will send a single confirmation message and then stop sending you SMS. To resume, reply **START** or simply write to us again. Reply **HELP** at any time, or email support@727.services, for assistance. Opting out of text messages does not close your support request; we will follow up through another channel where one is available.

5.5 Non-sharing of mobile information

No mobile information will be shared with third parties or affiliates for marketing or promotional purposes. All other categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

In plain terms: we do not sell, rent, trade, or otherwise share your mobile phone number, your SMS opt-in or consent, or the content of your text messages with any third party for marketing or promotional purposes, and we never share SMS opt-in or consent data with anyone. Your mobile number is disclosed only to the licensed communications providers strictly necessary to transmit the messages you have asked to receive — our messaging provider (Twilio Inc.) and the mobile network operators that deliver them — and only for that purpose.

6. Who we share information with

- **Communications providers.** Our messaging platform provider (Twilio Inc.) and the mobile carriers involved in delivering your messages, solely to transmit them.
- **IT and hosting providers.** Cloud hosting, storage, monitoring and helpdesk tools that process data on our instructions as processors under a data processing agreement.
- **Your organisation.** The client that contracted the Service — for example the content and outcome of your support requests, where relevant to the service we provide to it.
- **Professional advisers and authorities.** Auditors, lawyers, insurers, and public authorities where we are required to disclose information by law or to establish, exercise or defend legal claims.
- **Corporate transactions.** A buyer or successor in the event of a merger, acquisition or reorganisation, subject to protections no less strict than those in this policy.

We do not sell personal information, and we do not share mobile numbers or SMS consent with third parties or affiliates for marketing or promotional purposes.

7. International transfers

We are based in the European Union and store support data within the European Economic Area wherever possible. Some of our providers (for example our messaging provider) may process data in other countries. Where personal data is transferred outside the EEA, we rely on an adequacy decision of the European Commission or on Standard

Contractual Clauses together with supplementary safeguards where required. You can request a copy of the safeguards we use by writing to privacy@727.services.

8. How long we keep information

- **Support conversations and tickets:** for as long as needed to provide and evidence the service, and normally no longer than 24 months after the conversation is closed, unless the contract with your organisation or the law requires a different period.
- **Message delivery logs:** typically up to 12 months, for troubleshooting and billing verification.
- **Consent and opt-out records:** for as long as necessary to demonstrate compliance and to make sure an opt-out continues to be honoured.

When a retention period ends, we delete the data or irreversibly anonymise it.

9. Security

We protect personal information with technical and organisational measures appropriate to the risk, including encryption in transit (TLS), encryption at rest, role-based access control on a need-to-know basis, multi-factor authentication for administrative access, logging, and confidentiality obligations for our staff and suppliers. No method of transmission is completely secure; text messages in particular are not encrypted end-to-end, so please avoid sending confidential credentials or sensitive data by SMS.

10. Your rights and choices

Subject to the conditions in applicable law, you have the right to request access to your personal data, its rectification or erasure, restriction of processing, portability, and to object to processing based on our legitimate interests. Where processing is based on consent, you may withdraw it at any time without affecting the lawfulness of processing before withdrawal — for text messages, simply reply .

To exercise your rights, write to privacy@727.services. We respond within one month, and we may need to verify your identity first. If we act as processor for your organisation, we will forward your request to it.

You also have the right to lodge a complaint with a supervisory authority — in Italy, the Garante per la protezione dei dati personali (www.garanteprivacy.it) — or with the authority of your country of residence.

If you are located in the United States, you may also have the right to request access to, correction of, or deletion of your personal information, and to opt out of the "sale" or "sharing" of it. We do not sell or share personal information as those terms are defined by US state privacy laws, and we do not use personal information for cross-context behavioural advertising.

11. Children

The Service is a business tool intended for adults acting in a professional capacity. It is not directed to children, and we do not knowingly collect personal information from anyone under 16. If you believe a child has provided us with personal information, contact us and we will delete it.

12. Changes to this policy

We may update this policy from time to time. The current version is always published at this address, with the effective date shown at the top. If a change materially affects how we handle your information, we will give notice through the Service or through your organisation.

13. How to contact us

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