

# Information on the processing of personal data for the purpose of scientific research in Rossum

## **Why and how we process personal data**

Rossum Ltd, company no. 10564783, address 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, United Kingdom and its affiliates (together as “we”, “our” or “us”) are working on cutting-edge scientific research to improve artificial intelligence (AI) data processing in a way to make it more effective and comparable. In order to create a scientific dataset, which will aid research and cross-evaluation of methods for document understanding using machine learning and AI, we integrated a large amount of publicly available business documents into a single public database. We are interested in extraction of data from business documents, not specifically personal data, but it might happen that personal data would be present in the documents.

## **Who is the data controller?**

Personal data might be processed on the basis of our legitimate interest for the purpose of conducting scientific research and providing a research benchmark and dataset available for future scientific research experiments in the field of AI, machine learning and document understanding. We are therefore the controller of such personal data, whether the recipient and also user could be anyone on the internet.

## **Personal information we collect**

During research we process a large amount of data, which may include the following categories of personal data:

- Names
- Contact Information (such as Addresses, Phone Numbers, Email Addresses)
- Payment Information and Bank account details
- Other identifiers used in business documents

We use data from different publicly available sources, such as:

- [Public Inspection Files \(PIF\), Federal Communications Commission](#)
- [Industry Documents Library - UCSF](#)
- EDGAR Database

## **Security measures in place:**

- We inform about our processing of personal data for scientific purposes on our websites, so anyone could find out any information on its own and apply his or her rights if he or she wants to know more.
- We propose easy ways to exercise your rights, which are described and explained below in more detail.

- We appointed DPO to supervise compliance with the rules of personal data protection.
- Publicly gathered dataset is shared only as a response to particular requests for scientific research purposes.
- We use a high standard of cybersecurity, so all data are safe, when processed by us.
- We are able to prove ISO 27001 certification, SAE18 SOC2 Type II audits which also cover the trust Service Principle of Security.

### **Personal data subject's rights**

We offer the following rights to all individuals regardless of their location or applicable privacy regulations.

- **Right to information**

According to Article 14/5 b) General Data Protection Regulation (EU) 2016/679 (also GDPR), the controller (Rossum Ltd) does not have to inform the data subjects if the provision of such information would be impossible or would require disproportionate effort, which applies in particular in the case of processing for the purposes of scientific research. Considering that Rossum draws data from publicly available sources for its scientific research, and finding out what personal data is in the given dataset and how to contact those data subjects would be a clearly disproportionate effort, the exemption from the obligation to provide information according to Article 14 applies to this processing. Rossum therefore takes appropriate measures to protect the rights and freedoms of data subjects (see above).

- **Right to access your personal information or request a copy**

Subject to applicable law, you have the right to know whether we hold your personal information, obtain information about what personal information we process and why or to obtain a copy of your personal information. You also have a right to know how we use the personal information, whether we disclose it and how we protect it. However, this information may not be provided if our legitimate interests outweigh the interests of data subjects in obtaining this information, which is always assessed individually.

- **Right to change or correct your personal information**

You have the right to request that inaccurate personal information is updated or corrected. Due to the need for consistency of the scientific benchmark this correction, if justified, will be made through the publication of an erratum.

- **Right to delete or erase your personal information.**

Subject to applicable law, you have the right to request deletion of your personal information that is no longer necessary for the purposes underlying the processing, processed based on withdrawn consent, or if the processing is not compliant with applicable laws. Since the processing is carried out in the public interest and it is likely that the exercise of the right to erasure would seriously threaten the fulfillment of the objectives of such processing, the right to erasure shall not be exercised.

- Right to object to the processing of your personal information.

You have the right to object to our processing of your personal information based on our legitimate interest. This means that we will stop using your personal information for such purposes, unless we demonstrate compelling legitimate grounds for the processing which override the request. However as long as scientific research is carried out in the public interest and it is likely that the exercise of the right to erasure would seriously threaten the fulfillment of the objectives of such processing, then the right to erasure shall not be exercised.

- Right to ask us to restrict the processing of your personal information

You may have the right to ask us to limit the way that we use your personal information, where you contest the accuracy of your personal information, the processing is non-compliant with applicable law and you prefer to restrict the processing instead of the erasure of personal information or when you objected to the processing pending the verification of our legitimate grounds.

According to § 20 Act No. 110/2019 Coll., on the processing of personal data, the right to restrict processing for scientific purposes is reduced only to cases where the controller no longer needs the personal data for the original purpose and at the same time the data subject requires them for the performance, determination or exercise of legal claims. Therefore, in cases other than the one mentioned above, it is unlikely to successfully request a restriction on the processing of research data.

- Right to export your personal data or request portability of personal information

You have the right to request that we export to you in a machine-readable format all of the personal information you have provided to us about you (which does not include information derived from the collected information), where the processing is based on your consent or contract with you and is carried out by automated means. We will communicate back to you within reasonable timelines the result of your request. We may not be able to satisfy your request in full, but we will inform you of the reasons and further actions available to you.

If you would like to exercise any of the rights described above, please contact us at [privacy@rossum.ai](mailto:privacy@rossum.ai). If your request relates directly to use of our services you may also contact us at [support@rossum.ai](mailto:support@rossum.ai).

You also have the right to lodge a complaint with the local supervisory authority in charge of enforcing the privacy legislation applicable in your territory or the supervisory authority closest to us - Office for Personal Data Protection.

### **Contact us**

You may contact us to exercise any of your rights or ask for more information about your personal information and our privacy practices by contacting us and our data protection officer at [privacy@rossum.ai](mailto:privacy@rossum.ai) or Rossum Czech Republic s.r.o., Data Protection Officer, Krizikova 148/34, 18600 Prague, Czech Republic.