

# Privacy Policy

**Effective Date:** April 30, 2025

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## 1. Introduction

Dextra Strategist ("**Dextra**", "**we**", "**our**", or "**us**") provides automation and Cyber Security services that allow customers to create, schedule, and publish content across multiple social media platforms. We respect your privacy and are committed to protecting your Personal Information. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our website, applications, and automation services (collectively, the "**Services**").

By accessing or using the Services, you agree to the terms of this Privacy Policy and our Terms of Service.

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## 2. Scope

This Privacy Policy applies to Personal Information we process when you:

- Authorize our LinkedIn application or connect your LinkedIn profile or Company Page to our Services;
- Use Make.com automations that post, update, or analyze your social-media content;
- Interact with our chatbots or other solutions powered by OpenAI models; or
- Visit our website, customer portal, or communicate with us.

It does **not** apply to information processed solely by third-party platforms (e.g., LinkedIn, Make.com, or OpenAI) under their own privacy policies.

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## 3. Information We Collect

Category	Examples	Source
<b>Account &amp; Contact Data</b>	Name, email address, billing details, company, job title	You

<b>Platform Credentials</b>	LinkedIn OAuth tokens, Page IDs, user IDs	You / LinkedIn API
<b>Automation Content</b>	Posts, captions, images, documents, metadata	You
<b>Usage Data</b>	Logs of automation runs, scheduling activity, error traces	Automatically via Make.com
<b>Device &amp; Technical Data</b>	IP address, browser type, operating system, time zone	Automatically via cookies & log files

We do **not** intentionally collect sensitive data (e.g., government IDs, health data) and request that you refrain from supplying such data through the Services.

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#### 4. How We Use Your Information

We use Personal Information to:

1. **Provide and operate the Services** (e.g., schedule and publish LinkedIn posts on your behalf);
2. **Authenticate** your identity and maintain session security;
3. **Monitor and improve** the performance and reliability of our automations;
4. **Respond to inquiries** and offer customer support;
5. **Conduct analytics** and develop new features (using aggregated or anonymized data where possible);
6. **Comply with legal obligations** and enforce our agreements.

We do **not** sell or rent your Personal Information.

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#### 5. Legal Bases for Processing (GDPR-specific)

Where the European Union General Data Protection Regulation ("GDPR") applies, our lawful bases include:

- **Performance of a contract** – To deliver the Services you request;
- **Legitimate interests** – To secure and improve our Services;

- **Consent** – For optional features such as marketing emails or AI training (opt-in);
- **Legal obligation** – To satisfy accounting, tax, or regulatory requirements.

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## 6. Disclosure of Information

We disclose Personal Information only as described below:

Recipient	Purpose	Safeguards
<b>OpenAI OpCo, LLC</b>	Natural-language generation, content summarization, other AI features	Data sent via encrypted API; no training without opt-in
<b>Celonis SE (Make.com)</b>	Workflow execution, scheduling, error handling	EU–US Data Privacy Framework participant; DPA in place
<b>LinkedIn Corporation / LinkedIn Ireland</b>	Authentication, content publication, social analytics	OAuth 2.0 tokens; subject to LinkedIn API Terms
<b>Cloud hosting &amp; analytics providers</b>	Secure hosting, backups, aggregated usage metrics	Data Processing Agreements, SOC 2 / ISO 27001 compliant
<b>Legal or governmental authorities</b>	Compliance with subpoenas, court orders, or lawful requests	Disclosure limited to what is legally required

We require all processors to protect your data in accordance with this Privacy Policy and applicable law.

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## 7. International Transfers

We store data on servers located in the United States and the European Union. When we transfer Personal Information outside your jurisdiction, we rely on legal mechanisms such as Standard Contractual Clauses or adequacy decisions.

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## 8. Data Retention

We retain Personal Information only for as long as necessary to:

- Provide the Services and fulfill the purposes described in this Policy.
- Comply with applicable laws (e.g., tax, accounting);
- Resolve disputes and enforce our agreements.

LinkedIn OAuth tokens and post metadata are deleted within **30 days** after you disconnect your LinkedIn account or terminate your subscription.

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## 9. Your Rights

Depending on your jurisdiction, you may have the right to:

- Access, correct, or delete Personal Information.
- Object to or restrict processing.
- Withdraw consent at any time.
- Port your data to another provider.
- Lodge a complaint with a supervisory authority.

To exercise these rights, contact us at **support@dextraonline.com**.

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## 10. Cookies and Similar Technologies

We use strictly necessary cookies for session management and security. Where required by law, we seek your consent for analytics cookies. See our Cookie Notice for details.

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## 11. Information Security

We employ industry-standard technical and organizational measures, including:

- Encryption in transit (TLS 1.2+) and at rest for sensitive fields;
  - Role-based access controls and multi-factor authentication for administrators;
  - Continuous monitoring, vulnerability management, and regular penetration testing.
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## 12. Changes to This Privacy Policy

We may update this Policy periodically. Material changes will be announced via email or in-app notice at least **14 days** prior to the effective date.

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### **13. Contact Us**

For questions or concerns about this Privacy Policy or our privacy practices, contact:

**Dextra Strategist – Privacy Office**

1900 North Bayshore drive, Miami, FL, 33132

Email: [\*\*support@dextrastrategist.com\*\*](mailto:support@dextrastrategist.com)

Phone: +1 754 308 6888