

Dextra Privacy Notice

Last update: 30.06.2025

Mellow (TMS SolarWeb Limited) processes certain personal data to provide access to and improve the Dextra service. Fix Freelancer LTD., acting as an agent on behalf of TMS SolarWeb Limited, does not directly process personal data. All data processing activities are carried out by personnel of TMS SolarWeb Limited, which determines the purposes and means of the processing.

This Privacy Notice explains how and why your data is collected and processed in connection with this specific service.

For general privacy practices across the Mellow Group, please refer to our Privacy Policy available at <https://www.mellow.io/documents/privacy-policy>.

Why is Mellow collecting this data?

The Dextra service helps freelancers find job opportunities by using AI-assisted tool to conduct and optimize cold outreach campaigns..

To provide this service, Mellow collects and processes the following data:

- Full name,
- Email address,
- Email content (including messages sent as part of campaign),
- Metadata related to emails (timestamps, delivery status, etc.),
- AI-generated recommendations, message suggestions based on campaign data,
- Technical data (IP address, browser information) for service delivery and security.

Payment data: payment card details and transaction data are processed by our payment service providers (PSP). Mellow does not store or access full payment card numbers.

How do we use users' information?

All information collected is used to:

- Core service delivery and functionality,
- AI-powered features and automated processing,
- Payment processing,
- Platform security and fraud prevention,
- Service improvement and optimization,
- User support and communication,
- Send marketing communications with users' separate consent.

Mellow does not use this information for unrelated marketing or profiling beyond service improvement.

What is our legal basis for this processing?

Our legal basis for this processing is:

- Performance of a contract under Article 6(1)(b) of the GDPR – to provide the service’s core functionality and deliver the services you have requested,
- Legitimate interest under Article 6(1)(f) of the GDPR – to improve our services, ensure platform security and prevent fraud,
- Consent under Article 6(1)(a) of the GDPR – where users choose to receive marketing communications.

Will your data be shared?

We may share your data with:

- Trusted service providers who support platform operation. Some of these providers may be located outside the EEA. Where applicable, we use appropriate safeguards such as Standard Contractual Clauses or adequacy decisions,
- Other Mellow entities for service delivery, technical support, and platform improvement,
- Law enforcement or regulatory authorities when legally required or to protect our legitimate interest.

We do not sell your personal data or share it for advertising or unrelated commercial purposes.

How long will we retain non-user information?

Mellow retains personal data as follows:

- Account information: While your account remains active and for up to 2 years after account closure to comply with legal obligations, resolve disputes, and prevent fraud,
- Campaign and communication data (including email messages, metadata and analytics) is retained for up to twelve (12) months from the date of interaction, unless deleted earlier by you.
- Technical and security data: Up to 6 months for security and fraud prevention purposes.

Other data may be retained longer where required by law, for dispute resolution, regulatory investigations, or legitimate audit purposes. You may request earlier deletion of your data, subject to our legal and legitimate business obligations.

How can users exercise their data subject rights?

Data subjects have the following rights regarding their personal data:

- Right to Access: Request access to your personal data.
- Right to Rectification: Request correction of inaccurate or incomplete data.
- Right to Erasure: Request deletion of your personal data under certain conditions.
- Right to Restrict Processing: Request limitation of processing your data.
- Right to Data Portability: Receive your data in a structured, commonly used format.
- Right to Object: Object to processing based on legitimate interests.
- Right to Lodge a Complaint: Contact your local data protection supervisory authority if you believe your rights have been violated.

To exercise these rights, please contact us at dpo@mellow.io.

Marketing Communications

With your separate consent, we may send you information about other products and services developed by us, including new AI-enhanced digital tools. You can withdraw your consent at any time using the unsubscribe link in our emails or by contacting us directly.

Security Measures

We implement appropriate technical and organizational security measures to protect your personal data against unauthorized access, alteration, disclosure, or destruction. These measures include encryption, access controls, regular security assessments, and staff training on data protection.

Contact Us

If you have any questions or concerns about this Privacy Notice or our data processing practices, please contact us at: dpo@mellow.io or by mail at the postal address: TMS SolarWeb Ltd on floors 5 and 6 of 17 Theklas Lysioti, Pissas Building, Limassol 3030, Cyprus.