

Privacy Policy

Version 1.13 (setembro de 2026) · Recato, a service provided by Forsnaps AI - Soluções Tecnológicas, Unipessoal Lda

1. Who the controller is

Forsnaps AI - Soluções Tecnológicas, Unipessoal Lda (VAT no. 518932494), with registered office at Rua da Igreja N°99, Varziela, 4650-722 Felgueiras, is the controller of the personal data collected through the service Recato, available at recato.ai. Contact for data protection matters: info@recato.pt.

2. What data we process and why

Data	Purpose	Legal basis	Retention
Name, email and, if you provide them, VAT number, company and telephone (subscription and contact)	Creating and managing the account; service communications	Performance of the contract	For as long as the account exists, plus 12 months
Conversations, attached files, derived memories	Providing the AI assistant service	Performance of the contract	A period set by the customer (configurable retention); by default, for as long as the account exists
Technical logs (IP, date, browser agent)	Security, abuse detection, usage limits	Legitimate interest	90 days
Billing data	Billing and tax obligations	Legal obligation	10 years
AI consumption (tokens, costs)	Accounting for credits and limits	Performance of the contract	24 months
Usage measurement: the step reached (arrived, wrote a first message, created an account, subscribed, hit a limit), plan, date and time, country, type of browser and an identifier of the space that cannot be traced back to the customer. No conversation content, no name and no email	Understanding at which step people stop being able to use the service, and fixing what blocks them	Legitimate interest	12 months
Connected mailbox (optional): access credentials issued by the mail provider or, for IMAP/SMTP mailboxes, an encrypted username and password; the address and name of the account; the content of emails searched, read or sent by the assistant	Reading and sending mail on the user's behalf, when they ask the assistant to or within a task	Performance of the contract, upon voluntary connection by a user holding an account	The credentials for as long as the mailbox is connected; the content of the emails remains only in the conversation where it was used, under the retention period for conversations

Trying it without an account. When you click «Try it» we create a temporary user, with no name and no email, in a shared trial space, and store technical session cookies in your browser, which disappear when you close it. Without an account a mailbox cannot be connected: the assistant neither reads nor sends your mail, and we ask you for no email credentials at all. Without an account, conversations are not kept either: once the browser is closed you no longer have access to them, your next visit starts in a new, empty space, and the previous space is deleted from our systems, together with the conversations and files, after 24 hours without activity. If, in the same session, you create a free account or subscribe to a plan, the conversation in progress

moves to your space and the temporary one is deleted at that moment.

Free account. To create a Free plan account we ask for your name, email and a password, and we confirm the address by email. The account has its own space, like the paid plans, and conversations are kept for the retention period you set. The free account carries the same commitments as the paid plans: processing in the European Union and no model training.

3. Where the data lives

Data is hosted and processed exclusively in data centres within the European Union. Language model inference is carried out by a European sub-processor, on servers in the European Union, with no retention of requests once answered and no use of the data to train models. There are no transfers outside the European Economic Area.

If you connect your mailbox, the assistant communicates with your mail provider (Microsoft 365, or the IMAP/SMTP server you specify) through that provider's official interfaces. That provider was chosen and contracted by you and handles your emails under its own terms, including as to where its servers are located; the Recato does not control it. Outside that connection, everything above continues to apply.

4. Sub-processors

We engage the sub-processors listed in the Data Processing Agreement (DPA), available at [dpa](#): hosting in the European Union, model inference in the European Union, transactional email delivery and payment processing. All are bound by contract to the same confidentiality and security obligations.

5. We do not train models on your data

Your conversations, files and account data are never used, by us or by our sub-processors, to train, fine-tune or evaluate artificial intelligence models.

6. Retention controlled by the customer

The account administrator can set a retention period (in days) after which conversations, attached files and derived memories are deleted automatically. They can also delete individual conversations at any time and request complete deletion of the account.

We do not analyse conversations with abuse classifiers, nor do we retain content or scores on that basis. A deleted conversation leaves no record.

7. Your rights

You have the right of access, rectification, erasure, restriction, portability and objection, under the GDPR.

Portability is immediate and does not depend on us: in «My account», the «Export my data» button delivers, there and then, a file with your conversations — as data, usable by another system, and in a readable format —, the files you attached, the assistant's memory, the tasks and the emails the assistant wrote on your behalf. Whoever manages the account can export the data of every user in the workspace in the same way. You may do it as often as you wish, at no cost and without asking us first. Passwords and mailbox credentials are not part of the export: they are secrets kept on the server, not data to be returned.

To exercise the remaining rights, write to info@recato.pt. We reply within one month. You may lodge a complaint with the Portuguese data protection authority (CNPD) or with the supervisory authority of your own country.

8. Connected mailbox

Connecting a mailbox requires an account and is done by the user themselves, in their own account; it is not available in the trial space, which has no account. We request from the provider only the access needed to read and send mail. The assistant reads only what the question or the task requires, and sends an email only after the user approves it, unless they have authorised free sending within a task. Access credentials never appear in the interface; passwords for IMAP/SMTP mailboxes are encrypted with a key that exists only on the server. Disconnecting the mailbox deletes the credentials immediately. Emails that are read do not enter the assistant's memory, unless the user expressly asks for it.

9. Security

Encryption in transit (TLS) and at rest, isolation per customer (each customer, individual or company, has their own database), strong password authentication and optional two-factor authentication, encrypted backups in the European Union, access logging and rate limiting.

10. Cookies

We use only strictly necessary cookies (session and form protection). We use no advertising cookies and no third-party tracking cookies.

11. Usage measurement

We measure use of the service to understand at which step people stop being able to use it — for example, how many arrive, how many get as far as writing a first message, how many create an account and how many are stopped by a limit of ours. This measurement covers the site, the trial space and each customer's space as well.

For each step we record only: the step itself, the plan, the date and time, the country and type of browser (derived from the IP address and browser agent, which are not stored), and a technical identifier of the space which, on its own, does not identify the customer or the user. **We never record the content of conversations, files, names, email addresses, tax identification numbers or any text written by the user.**

Measurement is carried out by a system hosted on our own servers, in the European Union; nothing is sent to third-party analytics services. It uses no cookies and no other marker stored on the device. The basis is our legitimate interest in maintaining and improving the service, and the records are kept for 12 months. You may object to this measurement using the contact given in point 1.

12. Changes

Material changes to this policy are notified by email 30 days in advance. The version in force is always at recato.ai/privacidade.