

1. Scope of This Policy

This Privacy Policy applies to the AP Automation Enabler for Dynamics 365 Business Central (the "Add-On"), published by Southeast Dynamics Pte Ltd ("Southeast Dynamics", "we", "us", or "our") and available on Microsoft AppSource. It governs how personal and business data is processed through the Add-On's integration between BreezDoc (document intelligence and recognition engine), Microsoft Dynamics 365 Business Central, and Azure OpenAI.

This policy is made publicly available at www.sedynamics.com.sg/privacy-policy in compliance with Microsoft Commercial Marketplace policy 100.6.1.

This policy does **not** replace or supersede the privacy policies of:

- Microsoft Corporation
- BreezDoc (Breezlab AI)
- Any third-party vendor portal or email service used by the customer to submit invoices

2. Data We Process

The Add-On processes data strictly to enable invoice capture, document recognition, and ERP integration. No data is processed beyond what is necessary for these stated purposes.

2.1 Personal Data (Vendor & AP Contact Data)

Depending on customer configuration, this may include:

- Vendor contact name
- Vendor email address (invoice submission and correspondence)
- Vendor billing or remittance address
- Bank or payment reference details appearing on submitted invoices
- Internal AP approver name and email (for approval routing)

2.2 Transactional & Business Data

- Invoice line items, quantities, and pricing
- Purchase order and goods receipt references
- Vendor and tax registration numbers
- Matching status, exceptions, and approval history
- Posted Purchase Invoices and related fulfilment data in Business Central

2.3 Document Data

- Original invoice files (PDF or image) submitted via email, document folder, or AP Portal upload
- Extracted field data produced by the document recognition engine

2.4 System & Technical Data

- API transaction logs
- Integration event timestamps
- Error and diagnostic information

3. Legal Basis for Processing

We process personal data only where a valid legal basis exists under applicable data protection law, including the Singapore Personal Data Protection Act (PDPA) and, where applicable, the EU General Data Protection Regulation (GDPR). Our legal bases are:

Processing Activity	Legal Basis
Invoice capture and document recognition	Performance of a contract (Art. 6(1)(b) GDPR / PDPA s.18)
Invoice matching and ERP synchronisation	Performance of a contract (Art. 6(1)(b) GDPR / PDPA s.18)

Processing Activity	Legal Basis
System diagnostics and performance monitoring	Legitimate interests of the publisher and customer (Art. 6(1)(f) GDPR / PDPA s.18)
Compliance with legal or regulatory obligations	Legal obligation (Art. 6(1)(c) GDPR / PDPA s.18)

4. Purpose of Data Processing

We process data solely for the following purposes:

- Capturing vendor invoices submitted via email, monitored document folder, or AP Portal upload
- Extracting invoice data using the document recognition engine
- Performing 2-way and 3-way matching against purchase orders and goods receipts in Business Central
- Routing exceptions and mismatches for AP approval
- Creating and posting Purchase Invoices in Dynamics 365 Business Central
- Ensuring system reliability, performance monitoring, and troubleshooting

We do not:

- Sell personal data to any third party
- Use vendor or AP contact data for advertising or marketing profiling
- Use personal data to train public or consumer AI models
- Share personal data with any third party without authorisation
- Process personal data for any purpose beyond those stated in this policy

5. Use of AI & Automated Processing

The Add-On uses **BreezDoc** and **Azure OpenAI** to recognise and extract structured data from invoice documents, and to interpret extracted content and support matching logic against purchase orders and goods receipts within Business Central. No automated decisions with legal or similarly significant effects are made solely by automated means without human oversight — invoices flagged as exceptions are routed for human approval before posting.

All AI processing:

- Runs within Microsoft Azure's enterprise environment
- Is isolated to the customer's tenant and configuration
- Is governed by Microsoft's Responsible AI principles and data protection commitments
- Does not use customer data to train or improve Microsoft's foundational AI models
- Does not use customer invoice data to train BreezDoc's underlying recognition models beyond the customer's own tenant, unless explicitly opted in

6. Data Storage & Hosting

- Business and transactional data resides within Microsoft Dynamics 365 Business Central (Microsoft Azure cloud)
- Document recognition processing occurs within BreezDoc, scoped to the customer's configured environment
- AI-assisted matching occurs within Azure OpenAI, scoped to the customer's Azure subscription
- No customer ERP data or invoice document is permanently stored outside Microsoft-managed or BreezDoc-managed environments unless explicitly configured by the customer

Data Residency:

Data residency follows:

- Microsoft Azure regional data centre policies
- The customer's selected Dynamics 365 tenant region
- BreezDoc's configured processing region, as agreed with the customer

7. International Data Transfers

Southeast Dynamics is incorporated in Singapore. Data processed through the Add-On may be transferred to and hosted in Microsoft Azure data centres and BreezDoc processing environments outside Singapore, including within the European Economic Area (EEA) or other jurisdictions, depending on the customer's preferred Dynamics 365 tenant region and BreezDoc configuration.

Such transfers are safeguarded by:

- Microsoft's Data Processing Agreement and Standard Contractual Clauses (SCCs) as approved by the European Commission
- Contractual data processing terms with Breezlab AI (BreezDoc)
- Microsoft's compliance with applicable data protection frameworks including GDPR and Singapore PDPA
- Azure's enterprise-grade security and compliance certifications (ISO 27001, SOC 2, etc.)

8. Data Sharing & Disclosure

We share data only where strictly necessary to operate the Add-On or as required by law. The following third-party service processors may receive data:

Recipient	Purpose	Safeguard
Microsoft Azure / Dynamics 365 Business Central	ERP data storage and processing	Microsoft DPA & SCCs
Azure OpenAI (Microsoft)	AI-assisted invoice matching	Microsoft DPA & SCCs
BreezDoc (Breezlab AI)	Document recognition and data extraction	Contractual data processing terms

We do not disclose personal data to any other third parties for marketing, advertising, or profiling purposes. We may disclose data when required by law, regulation, or lawful authority.

9. Data Security

We apply appropriate technical and organisational measures to protect personal data against unauthorised access, disclosure, alteration, or destruction, including:

- Secure API authentication and OAuth 2.0 authorisation
- Role-based access controls within Business Central and the AP Portal
- Encryption in transit (TLS 1.2+) and at rest, as provided by Microsoft Azure and BreezDoc
- Audit logs within Dynamics 365 Business Central
- Regular security reviews of integration components

Customer responsibilities:

- User access management within their Business Central environment and AP Portal
- Vendor and AP approver account security
- Ensuring submitted invoice documents do not contain data beyond what is necessary for processing

10. Data Retention

Data Type	Retention Period
Transactional & vendor data (invoices, matching records)	Follows the customer's Business Central retention policy
Original invoice documents (PDF/image)	Follows the customer's configured document retention policy, or 12 months by default
API transaction logs and integration event timestamps	Maximum 90 days, unless required longer for active dispute resolution
Error and diagnostic data	Maximum 30 days from date of capture
Anonymised/aggregated performance metrics	Up to 12 months for service improvement purposes

11. Data Subject Rights

Where applicable under local data protection laws (including GDPR and Singapore PDPA), individuals may have the right to:

- **Access:** Request a copy of personal data we hold about you
- **Correction:** Request correction of inaccurate or incomplete data
- **Erasure:** Request deletion or restriction of processing of your personal data
- **Data Portability:** Receive your personal data in a structured, machine-readable format (where technically feasible)
- **Objection:** Object to processing based on legitimate interests
- **Withdraw Consent:** Where processing is based on consent, withdraw it at any time without affecting prior processing
- **Lodge a Complaint:** File a complaint with a relevant supervisory authority (e.g. Personal Data Protection Commission of Singapore, or the relevant EU Data Protection Authority)

As Southeast Dynamics acts as a **data processor** in most implementations (with the customer being the data controller), data subject requests should be directed in the first instance to the **customer organisation**. Southeast Dynamics will support customers in fulfilling such requests as required.

12. Children's Privacy

The AP Automation Enabler for Dynamics 365 Business Central is a **business-to-business (B2B) enterprise solution**. It is not directed at, designed for, or intended to be used by individuals under the age of 13 (or 16 where required by applicable law). We do not knowingly collect personal data from children. If you believe a child has provided personal data through this solution, please contact us immediately at info@sedynamics.com.sg.

13. Customer Responsibilities

Customers deploying the Add-On are responsible for:

- Informing vendors that submitted invoices are processed via document recognition and connected to an ERP system
- Obtaining any required vendor consent in accordance with applicable law
- Complying with applicable data protection laws (including PDPA, GDPR, and other local regulations)
- Maintaining appropriate data processing agreements with Southeast Dynamics where required by law
- Ensuring end-user awareness of AP Portal-based invoice submission and processing

14. Governing Law & Jurisdiction

This Privacy Policy is governed by the laws of the Republic of Singapore. Any disputes arising in connection with this policy shall be subject to the exclusive jurisdiction of the courts of Singapore. Where GDPR applies to data subjects in the European Economic Area, the relevant EU data protection laws shall also apply.

15. Changes to This Policy

We may update this Privacy Policy from time to time to reflect regulatory changes, product improvements, or security updates. Material changes will be communicated through official Southeast Dynamics channels. The effective date at the top of this document will be updated accordingly. Continued use of the Add-On after updates constitutes acceptance of the revised policy.

The latest version of this policy is always available at: www.sedynamics.com.sg/privacy-policy

16. Contact Information

For privacy-related enquiries, data subject requests, or to report a concern, please contact:

Southeast Dynamics Pte Ltd	
Company Registration No.:	202501374Z
Address:	2 Venture Drive, #24-01 Vision Exchange, Singapore 608526
Email:	info@sedynamics.com.sg
Website:	https://www.sedynamics.com.sg/privacy-policy
GST Registration:	202501374Z

This Privacy Policy complies with Microsoft Commercial Marketplace policy 100.6.1, the Singapore Personal Data Protection Act (PDPA), and the EU General Data Protection Regulation (GDPR) where applicable.