

# Privacy Policy

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**Effective Date:** September 17, 2025

**Last Updated:** September 17, 2025

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## 1. Introduction and Scope

BetterConversion, operated by Fullscope Services Inc. ("we," "our," "us," or "Company") maintains a comprehensive data governance framework designed to optimize the utilization of personal and proprietary information assets. This Privacy Policy delineates our methodologies for collection, processing, computational analysis, storage optimization, and strategic utilization of information when you access our AI-powered conversational intelligence platform and associated computational services (collectively, the "Service").

**Our Regulatory Compliance Framework:** We are domiciled in Canada and maintain adherence to Canadian privacy legislation, including the Personal Information Protection and Electronic Documents Act (PIPEDA), as well as applicable provincial privacy frameworks. We implement compliance protocols for international privacy regulations including GDPR, CCPA/CPRA, and other jurisdictional requirements, while reserving comprehensive rights to data utilization within legal parameters.

By accessing our Service, you acknowledge comprehensive understanding of this Privacy Policy and provide informed consent to our data processing methodologies, computational utilization practices, and strategic data initiatives as detailed herein, subject to statutory rights under applicable legal frameworks.

## 2. Definitions

For the purposes of this Privacy Policy:

- **Personal Information/Personal Data:** Any information concerning an identifiable individual, as delineated under applicable privacy legislation and regulatory frameworks
- **Processing:** Any computational operation, analytical procedure, or data manipulation activity performed on personal information, including but not limited to collection, utilization, algorithmic analysis, storage optimization, disclosure protocols, and data lifecycle management
- **Data Controller:** The juridical entity that determines the purposes, methodologies, and computational means of processing personal information (BetterConversion for account infrastructure and service-related data assets)
- **Data Processor:** An entity that processes personal information pursuant to contractual arrangements on behalf of a data controller (our computational service providers and AI infrastructure partners)
- **Sensitive Personal Information:** Information requiring enhanced protection protocols under applicable legal frameworks and regulatory compliance requirements

## 3. Information We Collect

### 3.1 Information You Provide Directly

**Account and Registration Data Infrastructure:**

- Complete personal identifiers, electronic mail addresses, and cryptographic authentication credentials
- Corporate or organizational entity designations and associated metadata
- Professional role classifications and contact information repositories
- Profile imagery and preference configuration data
- Financial transaction addresses and payment processing information (processed through third-party financial service providers)

**Conversational Content and Media Assets:**

- Audio-visual recording artifacts and multimedia data streams
- Meeting transcription outputs generated through AI computational processing pipelines
- User-uploaded documents, file assets, and presentation materials
- Conversational exchanges, commentary data, and annotation metadata
- Meeting metadata repositories (participant registries, temporal markers, duration metrics, configuration parameters)
- Speaker identification corrections and textual modification datasets

**Business Intelligence and CRM Data Assets:**

- Client relationship databases and contact information repositories
- Sales pipeline analytics and commercial transaction data
- Organizational hierarchy and team management metadata
- Custom AI agent configuration parameters and computational instructions
- Integration protocol settings and API configuration frameworks

**Communication Analytics and Engagement Data:**

- Support request content repositories and correspondence archives
- User feedback datasets, survey response analytics, and research participation metrics
- Marketing communication preference profiles and engagement response data

## 3.2 Information Collected Automatically

**Technical Telemetry and Usage Analytics:**

- Network protocol addresses, unique device identifiers, and network infrastructure metadata
- Browser application specifications, version parameters, and configuration profiles
- Operating system architectures and device characteristic fingerprints
- Service utilization patterns, feature interaction analytics, and session behavioral data
- Performance optimization metrics, error diagnostic logs, and system health indicators
- Traffic source attribution and navigational pathway analytics within the Service ecosystem

**Browser-Based Tracking and Persistent Identifier Technologies:**

- Essential persistent identifiers for service functionality and security protocol maintenance
- Performance optimization cookies for analytical processing and system enhancement
- Functional persistent storage for user preference configuration and settings management

- Marketing attribution cookies for advertising campaign measurement and conversion tracking (subject to consent protocols)
- Local storage mechanisms and similar tracking technologies for behavioral analytics

**Geospatial and Temporal Data:**

- Approximate geographic positioning derived from network protocol address analysis
- Temporal zone configuration data for meeting scheduling optimization algorithms

### 3.3 Information from Third Parties

**Third-Party Integration and API Data Streams:**

- Data assets imported from connected business application ecosystems
- Video conferencing platform integration data (Stream.io infrastructure)
- Financial transaction processing information (Stripe payment gateway)
- Authentication credentials from OAuth provider systems (Google identity services)

**Commercial Contact Intelligence:**

- Publicly accessible business contact information repositories
- Data assets acquired from legitimate commercial data providers (pursuant to appropriate legal frameworks)

## 4. Legal Basis for Processing (GDPR Compliance)

We process your personal information based on the following legal grounds:

**Contract Performance:** Processing necessary to provide the Service, manage your account, process payments, and fulfill our contractual obligations.

**Legitimate Interests:**

- Improving and securing the Service
- Analyzing usage patterns and performance
- Preventing fraud and security threats
- Marketing to existing customers (subject to opt-out rights)
- Business operations and administration

**Consent:**

- Marketing communications to prospects
- Non-essential cookies and tracking
- Optional features requiring explicit consent
- AI model training using your data (opt-out available)

**Legal Compliance:**

- Responding to legal requests and court orders
- Tax and financial record keeping
- Regulatory compliance obligations

**Vital Interests:** Protecting the safety and security of individuals and the Service.

## 5. How We Use Your Information

### 5.1 Service Provision and Core Functionality

We use your information to:

- Provide, operate, and maintain the Service
- Process meeting recordings and generate AI-powered transcriptions
- Enable video conferencing and real-time collaboration features
- Facilitate team and organization management
- Store, manage, and secure your files and documents
- Process payments and manage subscription billing
- Provide customer support and technical assistance
- Send essential service communications and security notifications

### 5.2 AI Processing and Machine Learning

#### **Meeting Intelligence:**

- Transcribe audio/video content using advanced AI models
- Generate meeting summaries and insights
- Analyze conversation patterns for sales coaching
- Extract key topics, action items, and decisions
- Provide automated meeting categorization

**Data Minimization:** We only use the minimum data necessary for AI processing and provide opt-out mechanisms where possible.

#### **Machine Learning Operations and Algorithmic Enhancement:**

- **Iterative Model Optimization:** We may utilize de-identified, statistically aggregated computational derivatives extracted from your data corpus to enhance our neural network architectures, natural language processing parameters, and algorithmic inference capabilities
- **Proprietary Model Training Protocols:** We reserve comprehensive rights to incorporate your data, metadata, content streams, and linguistic artifacts into our supervised and unsupervised learning pipelines for the enhancement of our proprietary large language models, transformer architectures, and downstream task-specific fine-tuning procedures
- **Internal Research and Development Operations:** Customer-generated data may serve as training data for internal machine learning research initiatives, algorithmic development workflows, and the advancement of our computational intelligence infrastructure
- **Third-Party Computational Service Providers:** Our external AI infrastructure partners (including but not limited to OpenAI, AssemblyAI) process your data pursuant to their respective data processing agreements and computational service terms, which may include utilization for model training and enhancement
- **Technological Competitive Positioning:** Data processing operations and pattern extraction may contribute to our core intellectual property, technological differentiation, and market positioning capabilities

## 5.3 Service Improvement and Analytics

We analyze usage data to:

- Monitor Service performance and identify technical issues
- Optimize user experience and interface design
- Develop new features based on user behavior patterns
- Conduct A/B testing for Service improvements
- Generate aggregated analytics and reporting

## 5.4 Communications and Marketing

### **Service Communications:**

- Account notifications and security alerts
- Billing statements and payment confirmations
- Product updates and feature announcements
- Technical support and customer service

### **Marketing Communications (with consent):**

- Newsletter and product information emails
- Promotional offers and feature highlights
- Educational content and industry insights
- Event invitations and webinar notifications

**Opt-Out Rights:** You may unsubscribe from marketing communications at any time through account settings or email links.

## 5.5 Legal, Security, and Compliance

We may process your information to:

- Comply with applicable laws, regulations, and legal processes
- Respond to lawful requests from government authorities
- Protect against fraud, security threats, and unauthorized access
- Enforce our Terms of Service and investigate violations
- Protect the rights, property, and safety of our users and the public
- Conduct internal audits and compliance monitoring

## 6. Information Sharing and Disclosure

### 6.1 No Sale of Personal Information

We do not sell, rent, or trade your personal information to third parties for monetary or other valuable consideration.

#### 6.1a Comprehensive Data Protection Commitments

### **Commercial Data Utilization and Monetization Framework:**

- We may leverage your business intelligence, conversational content, and computationally-derived insights through our proprietary analytics engines to enhance our commercial product portfolio, service optimization algorithms, and market-facing offerings
- Customer-generated data may serve as input for our product development roadmap, feature engineering processes, and go-to-market strategy formulation through our internal business intelligence and competitive analysis systems
- Statistically aggregated and algorithmically anonymized business intelligence derivatives may be utilized for commercial monetization purposes, including but not limited to market benchmarking products, industry analysis reports, and competitive intelligence offerings
- While maintaining confidentiality protocols for customer-specific proprietary information, extracted patterns, behavioral insights, and usage analytics may contribute to our strategic business development initiatives and intellectual property portfolio

#### **Data Synthesis and Commercial Product Development:**

- We may synthesize commercial products, analytical reports, or market benchmarking tools utilizing aggregated and algorithmically de-identified data derivatives extracted from customer usage patterns and behavioral analytics
- Industry trend analysis, market intelligence products, and sector-specific insights may be developed from our collective customer data corpus for commercial distribution and revenue generation
- While your organization-specific competitive positioning remains protected under confidentiality frameworks, generalized patterns, methodological insights, and behavioral analytics may inform our product development lifecycle and commercial strategy execution

## 6.2 Service-Related Sharing

#### **Within Your Organization:**

- Team members and organization administrators (as configured in your settings)
- Meeting participants for shared recordings and transcriptions
- Authorized users within your organization's account structure

**Third-Party Service Providers:** We share information with trusted service providers who assist us in operating the Service:

- **Cloud Infrastructure:** Google Cloud Platform for secure data storage and processing
- **Payment Processing:** Stripe for subscription billing and payment processing
- **Video Services:** Stream.io for video conferencing and real-time communication
- **AI Services:** OpenAI and AssemblyAI for transcription and natural language processing with strict no-training clauses
- **Email Services:** Resend for transactional and marketing emails
- **Analytics Providers:** For usage analytics and Service optimization
- **Customer Support Tools:** For providing technical support and assistance

All service providers are bound by data processing agreements requiring them to protect your information and use it only for specified purposes. **AI service providers process your data according to their own terms of service, which may include use for model training and improvement.**

## 6.3 Business Transfers

In the event of a merger, acquisition, financing, bankruptcy, or sale of assets, your information may be transferred to the acquiring entity, subject to the same privacy protections and user rights outlined in this Policy.

## 6.4 Legal and Regulatory Disclosure

We may disclose your information when required by law or when we believe in good faith that disclosure is necessary to:

- Comply with legal processes, court orders, or government requests
- Protect our rights, property, or safety, or those of our users or the public
- Investigate and prevent fraud, security threats, or illegal activities
- Enforce our Terms of Service or other agreements
- Respond to claims of intellectual property infringement

## 6.5 Consent-Based Sharing

We may share your information with your explicit consent for purposes not otherwise covered in this Policy.

## 6.6 Aggregated and De-Identified Data

We may share aggregated, anonymized, or de-identified data that cannot reasonably be used to identify you, including for:

- Industry research and benchmarking
- Public reporting on service usage trends
- Academic research and collaboration
- Business development and partnership opportunities

## 6.7 Data Sovereignty and Control

### **Customer Data Sovereignty and Corporate Utilization Rights:**

- You maintain nominal ownership of raw data inputs, while simultaneously granting comprehensive utilization, processing, and derivative work rights as enumerated throughout these contractual frameworks and data processing agreements
- We function as both a computational service provider and an independent data beneficiary, with rights to extract, monetize, and derive autonomous commercial value from data processing operations and analytical insights
- While you retain export and deletion rights for specific data elements, all computational insights, learned representations, algorithmic improvements, and derivative intelligence generated through our processing systems remain our proprietary intellectual property
- BetterConversion acquires comprehensive rights to utilize, analyze, transform, and derive commercial and strategic insights from your data through our proprietary computational frameworks and business intelligence systems

### **Intellectual Property Derivation and Learning Rights Framework:**

- Sales methodologies, behavioral patterns, conversational analytics, and strategic insights derived through our computational processing of your data may be incorporated into our global service

enhancement protocols and cross-customer optimization algorithms

- We may retain rights to learnings, algorithmic improvements, model enhancements, and technological developments generated through the processing and analysis of your data within our computational infrastructure during our retention period or until deletion is requested
- While organization-specific confidential information remains subject to confidentiality protocols, generalized business intelligence, pattern recognition outputs, and analytical insights may be incorporated into our proprietary systems and commercial offerings during our retention period

## 7. International Data Transfers and Cross-Border Processing

### 7.1 Global Service Delivery

As a Canadian company serving global customers, your personal information may be transferred to and processed in countries outside your jurisdiction, including:

- United States (where many of our service providers operate)
- European Union (for EU-based infrastructure and services)
- Other countries where our service providers maintain facilities

### 7.2 Transfer Safeguards

For international transfers, we implement appropriate safeguards:

**Adequacy Decisions:** We transfer data to countries recognized by Canadian or other relevant authorities as providing adequate data protection.

**Standard Contractual Clauses (SCCs):** We use legally recognized data transfer agreements for transfers to countries without adequacy decisions.

**Binding Corporate Rules:** Internal data sharing agreements ensuring consistent protection standards.

**Certification Programs:** We work with service providers who maintain relevant privacy certifications.

### 7.3 Data Localization Compliance

We respect data localization requirements and can accommodate region-specific data storage needs for enterprise customers where legally required.

## 8. Data Security and Protection Measures

### 8.1 Technical Safeguards

We implement industry-standard security measures including:

**Encryption:**

- Data encrypted in transit using TLS 1.3 or higher
- Data encrypted at rest using AES-256 encryption
- End-to-end encryption for sensitive communications

**Access Controls:**

- Multi-factor authentication for user accounts
- Role-based access controls for internal systems
- Regular access reviews and privilege management
- Secure API authentication and authorization

**Infrastructure Security:**

- Secure cloud infrastructure with major providers
- Network segmentation and firewall protection
- Intrusion detection and prevention systems
- Regular security monitoring and alerting

## 8.2 Organizational Safeguards

**Personnel Security:**

- Background checks for employees with data access
- Regular privacy and security training programs
- Confidentiality agreements and data handling policies
- Principle of least privilege access

**Governance and Compliance:**

- Regular third-party security audits and assessments
- Incident response and breach notification procedures
- Data protection impact assessments for high-risk processing
- Vendor security assessments and monitoring

## 8.3 Data Breach Response

In the event of a data breach affecting personal information:

- We will investigate and contain the incident promptly
- Affected individuals will be notified as required by applicable law
- Relevant authorities will be notified within required timeframes
- We will implement remediation measures to prevent future incidents
- We will cooperate fully with regulatory investigations

## 8.4 Security Limitations

While we implement comprehensive security measures, no system can guarantee absolute security. You acknowledge the inherent risks of data transmission and storage, and we encourage you to take appropriate measures to protect your own devices and accounts.

# 9. Data Retention and Deletion

## 9.1 Retention Principles

We retain personal information only as long as necessary for the purposes outlined in this Policy, considering:

- Legal and regulatory requirements
- Contractual obligations and service provision needs
- Business operational requirements
- User preferences and account settings

## 9.2 Specific Retention Periods

**Account Information:** Retained while your account remains active plus 90 days after closure for account recovery purposes.

**Meeting Recordings and Transcriptions:**

- Free tier: 30 days from creation
- Paid plans: According to your subscription level and storage limits
- Enterprise: As specified in your agreement
- User-initiated deletion: Within 30 days of deletion request

**Billing and Financial Records:** Retained for 7 years as required by Canadian tax and accounting laws.

**Communication Records:**

- Support tickets: 3 years for quality assurance and training
- Marketing communications: Until opt-out or account closure

**Technical Logs:** 12 months for security and operational purposes, anonymized after 6 months.

**Legal Hold Data:** Indefinitely when required by legal proceedings or regulatory investigations.

## 9.3 Data Deletion Procedures

**User-Initiated Deletion:**

- Individual meeting and file deletion through Service interface
- Account closure triggers deletion of personal data within 90 days
- Bulk data export available before account closure

**Automated Deletion:**

- Expired recordings deleted according to retention policies
- Inactive accounts archived after 2 years, deleted after 5 years
- Marketing data removed upon opt-out

**Secure Deletion Standards:**

- Multi-pass overwriting for local storage
- Cryptographic erasure for encrypted cloud storage
- Certificate of destruction for physical media

## 9.4 Data Portability

You may export your data in machine-readable formats including:

- Meeting transcriptions and metadata

- Contact and client information
- Account settings and configurations
- Usage analytics and reports

## 10. Your Rights and Choices

### 10.1 Universal Rights (All Users)

**Access:** Request information about what personal data we hold about you and how it's processed.

**Correction/Rectification:** Request correction of inaccurate or incomplete personal information.

**Deletion/Erasure:** Request deletion of your personal information, subject to legal and operational limitations.

**Data Portability:** Receive a copy of your personal information in a structured, machine-readable format.

**Withdraw Consent:** Withdraw consent for processing based on consent (without affecting lawfulness of prior processing).

**Opt-Out:** Unsubscribe from marketing communications and non-essential processing.

### 10.2 Enhanced Rights (GDPR - EU/UK Users)

**Right to Object:** Object to processing based on legitimate interests, including profiling and direct marketing.

**Right to Restrict Processing:** Request limitation of processing in specific circumstances.

**Right to Data Portability:** Enhanced rights to transfer data between services.

**Right to Object to Automated Decision-Making:** Including profiling that produces legal or significant effects.

**Right to Lodge a Complaint:** File complaints with relevant data protection authorities.

### 10.3 California Consumer Rights (CCPA/CPRA)

**Right to Know:** Detailed information about categories of personal information collected and shared.

**Right to Delete:** Request deletion of personal information, with specified exceptions.

**Right to Correct:** Request correction of inaccurate personal information.

**Right to Opt-Out:** Opt out of the "sale" or "sharing" of personal information (we do not engage in these practices).

**Right to Non-Discrimination:** Protection against discriminatory treatment for exercising privacy rights.

**Right to Limit Sensitive Personal Information:** Request limitations on use of sensitive personal information.

### 10.4 Canadian Privacy Rights (PIPEDA)

**Access Rights:** Access to personal information held by the organization.

**Correction Rights:** Request correction of errors or omissions.

**Complaint Rights:** File complaints with the Privacy Commissioner of Canada.

**Accountability Rights:** Right to understand how the organization protects personal information.

## 10.5 Exercising Your Rights

To exercise your privacy rights:

**Online:** Use privacy controls in your account settings **Email:** Contact [admin@betterconversion.ai](mailto:admin@betterconversion.ai) with your request **Support:** Submit a request through our customer support system

**Identity Verification:** We may require identity verification to prevent unauthorized access to personal information.

**Response Time:** We will respond to requests within 30 days (or as required by applicable law).

**Free of Charge:** We will not charge fees for reasonable requests (excessive requests may incur processing fees as permitted by law).

## 11. Cookies and Tracking Technologies

### 11.1 Types of Cookies and Technologies

#### **Strictly Necessary Cookies:**

- Essential for Service functionality and security
- Cannot be disabled without affecting Service operation
- Include session management, authentication, and security cookies

#### **Performance and Analytics Cookies:**

- Monitor Service performance and usage patterns
- Help identify technical issues and optimization opportunities
- Provide aggregated usage statistics

#### **Functional Cookies:**

- Remember user preferences and settings
- Enable enhanced features and personalization
- Store language preferences and interface customizations

#### **Marketing and Advertising Cookies (with consent):**

- Deliver targeted advertising and marketing content
- Measure advertising campaign effectiveness
- Enable social media integration and sharing features

### 11.2 Third-Party Cookies

We may use cookies and tracking technologies from:

- Google Analytics for usage analytics
- Stripe for payment processing
- Social media platforms for integration features
- Customer support and chat systems

### 11.3 Cookie Management

**Browser Controls:** Most browsers allow you to control cookies through settings preferences.

**Consent Management:** We provide cookie consent tools for users in jurisdictions requiring consent.

**Opt-Out Tools:** Links to industry opt-out tools for advertising cookies.

**Mobile Settings:** Adjust privacy settings on mobile devices to control tracking.

### 11.4 Do Not Track Signals

We currently do not respond to Do Not Track browser signals due to lack of industry standards, but we respect other privacy preference signals where technically feasible.

## 12. Children's Privacy Protection

### 12.1 Age Restrictions

The Service is not intended for individuals under 16 years of age (or the applicable age of digital consent in your jurisdiction). We do not knowingly collect personal information from children under the applicable age threshold.

### 12.2 Parental Rights

If we become aware that we have collected personal information from a child without proper consent, we will:

- Delete the information promptly
- Terminate the associated account
- Notify parents/guardians where contact information is available
- Implement additional safeguards to prevent future collection

### 12.3 Educational Use

For educational institutions using our Service, additional privacy protections may apply under laws such as FERPA. Please contact us for information about educational privacy compliance.

## 13. Third-Party Services and Links

### 13.1 Third-Party Integrations

Our Service integrates with various third-party services and platforms. This Privacy Policy does not apply to third-party services, which are governed by their own privacy policies. We encourage you to review the

privacy practices of any third-party services you connect to our Service.

## 13.2 Data Sharing with Integrations

When you connect third-party services:

- We may share necessary data to enable the integration
- You control which data is shared through integration settings
- Third-party services may have their own data collection practices
- You can disconnect integrations at any time through your account

## 13.3 External Links

Our Service may contain links to external websites or services. We are not responsible for the privacy practices of external sites and encourage you to review their privacy policies before sharing information.

# 14. Automated Decision-Making and AI Processing

## 14.1 AI-Powered Features

Our Service uses artificial intelligence for:

- Audio and video transcription
- Meeting summary generation
- Sales insight and coaching analysis
- Content categorization and organization
- Spam and abuse detection

### Computational Data Processing Framework:

- **Primary Service Delivery:** AI computational systems process your data through automated inference pipelines to deliver immediate functional outputs while simultaneously contributing to our continuous learning systems and quality optimization protocols
- **Neural Network Training Operations:** Your data may be incorporated into our training datasets, validation sets, and fine-tuning corpora for the development and enhancement of our proprietary machine learning models, including but not limited to transformer architectures, encoder-decoder systems, and attention mechanisms
- **Federated Learning and Cross-Tenant Optimization:** Insights, patterns, and learned representations derived from your data may be incorporated into our global model parameters, thereby contributing to performance improvements that benefit our entire customer ecosystem through transfer learning and model generalization
- **Persistent Data Analytics and Model Enhancement:** We may retain, analyze, and continuously process your content through our data mining pipelines, feature extraction algorithms, and model updating procedures to enhance our computational capabilities and predictive performance

## 14.2 Human Review and Override

**Transcription Accuracy:** AI-generated transcriptions may contain errors and should be reviewed for accuracy.

**Human Oversight:** Significant decisions affecting your account are reviewed by human operators.

**Appeal Process:** You may request human review of automated decisions that significantly affect you.

## 14.3 Profiling and Automated Decision-Making Rights

For users subject to GDPR:

- You have the right not to be subject to decisions based solely on automated processing
- You may request human intervention in automated decision-making processes
- You may express your point of view and contest automated decisions

## 15. Privacy Policy Updates and Changes

### 15.1 Modification Rights

We may update this Privacy Policy to reflect:

- Changes in our data processing practices
- New Service features or functionality
- Legal and regulatory requirements
- Industry best practices and standards

### 15.2 Notice of Changes

We will provide notice of material changes through:

- Email notifications to registered users
- Prominent notice on our Service and website
- In-app notifications and announcements
- Updates to the "Last Updated" date at the top of this Policy

### 15.3 Types of Changes

**Material Changes:** Significant changes to data processing purposes, sharing practices, or user rights require advance notice and may require renewed consent.

**Non-Material Changes:** Technical updates, clarifications, and formatting changes may be made without advance notice.

**Legal Compliance Changes:** Changes required by law or regulation will be implemented as necessary to ensure compliance.

### 15.4 Continued Use

Your continued use of the Service after the updated Privacy Policy becomes effective constitutes acceptance of the changes. If you disagree with changes, you may close your account and discontinue use of the Service.

## 16. Contact Information and Privacy Inquiries

### 16.1 General Privacy Contact

For questions about this Privacy Policy or our privacy practices:

**Email:** admin@betterconversion.ai

**Subject Line:** Privacy Policy Inquiry

## 16.2 Data Protection Officer

For GDPR-related inquiries and requests:

**Email:** admin@betterconversion.ai

**Subject Line:** GDPR/Data Protection Request

## 16.3 Privacy Rights Requests

To exercise your privacy rights:

**Online:** Account Settings > Privacy Controls

**Email:** admin@betterconversion.ai

**Subject Line:** Privacy Rights Request

**Required Information:** Full name, email address, specific request, and identity verification

## 16.4 Response Commitments

- **Initial Response:** Within 1 business day for urgent security matters
- **Substantive Response:** Within 30 days for privacy rights requests (or as required by applicable law)
- **Complex Requests:** May require up to 60 days with explanation of delay
- **Language:** Responses provided in English or French (official Canadian languages)

# 17. Regulatory Compliance and Supervisory Authorities

## 17.1 Canadian Authorities

### Privacy Commissioner of Canada

Website: [priv.gc.ca](https://priv.gc.ca)

For complaints under federal PIPEDA

### Provincial Privacy Commissioners

For complaints under provincial privacy legislation (BC, Alberta, Quebec)

## 17.2 International Authorities

### European Data Protection Authorities

- European Data Protection Board (EDPB)
- National supervisory authorities in EU member states

### California Privacy Protection Agency

- For CCPA/CPRA complaints and inquiries

### UK Information Commissioner's Office (ICO)

- For UK GDPR compliance

## 17.3 Filing Complaints

You have the right to lodge complaints with relevant supervisory authorities regarding our processing of your personal information. We encourage you to contact us first to resolve any concerns, but you may file complaints directly with authorities at any time.

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## 18. Jurisdiction-Specific Disclosures

### 18.1 Canadian Users (PIPEDA Compliance)

**Collection Purposes:** Personal information is collected for purposes identified in this Policy.

**Consent:** Your consent is obtained before collection, use, or disclosure of personal information, except where permitted by law.

**Safeguards:** Appropriate security safeguards protect personal information against loss, theft, and unauthorized access.

**Access Rights:** You may access and request correction of your personal information subject to limited exceptions.

**Retention:** Personal information is retained only as long as necessary for identified purposes.

**Accountability:** We are accountable for personal information in our custody or control, including information transferred to third parties.

### 18.2 European Users (GDPR Compliance)

**Lawful Basis:** Processing based on contract, legitimate interests, consent, or legal compliance as specified in Section 4.

**Data Minimization:** We collect and process only personal data necessary for specified purposes.

**Purpose Limitation:** Personal data processed only for purposes specified in this Policy.

**Accuracy:** We maintain accurate and up-to-date personal data and correct errors promptly.

**Storage Limitation:** Personal data retained only as long as necessary for processing purposes.

**Integrity and Confidentiality:** Appropriate security measures protect personal data.

**Accountability:** We demonstrate compliance with data protection principles.

### 18.3 California Users (CCPA/CPRA Compliance)

#### Categories of Personal Information Collected:

- Identifiers (name, email, IP address, device IDs)
- Commercial information (payment history, preferences)
- Internet/network activity (usage data, cookies, logs)

- Audio/visual information (meeting recordings)
- Professional information (company, role, business contacts)
- Inferences drawn from personal information (usage patterns, preferences)

**Sources of Personal Information:**

- Directly from you (account registration, service use)
- Automatically from devices and browsers
- From third-party integrations and partners
- From publicly available sources (business directories)

**Business Purposes for Collection:**

- Providing and maintaining the Service
- Customer service and support
- Security and fraud prevention
- Marketing and communications (with consent)
- Legal compliance and protection of rights

**Categories of Third Parties:**

- Service providers and vendors
- Payment processors and financial institutions
- Professional advisors (legal, accounting)
- Government authorities (when required by law)

**Sale/Sharing:** We do not sell or share personal information as defined by the CCPA/CPRA.

**Sensitive Personal Information:** Audio/visual recordings, precise geolocation (when provided), and account credentials are treated as sensitive personal information with enhanced protections.

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**Company Information:**

BetterConversion

Operated by Fullscope Services Inc.

Incorporated in Ontario, Canada