WebChatBot.ai - an In-gage Technologies Limited company

Privacy Policy

Headline: Our AI technology is built on a proprietary Large Language Model (LLM) hosted securely within our own infrastructure. Unlike many solutions that rely on third-party models, we maintain full control over our AI system. This approach ensures complete data privacy and security, allows for cost-effective scalability, and gives us the flexibility to fine-tune the model to meet the specific needs of our clients without compromising on confidentiality.

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1. Introduction

WebChatBot.ai, an In-gage Technologies Limited company, is committed to safeguarding the privacy of our website visitors, customers, customer personnel, and end-users of our AI chatbot services.

1.1 We handle 4 different types of data:

a) Website Information – website visit and usage data gathered through cookies.

b) Provided Personal Information – this information is gathered when a website visitor fills out an online form, contacts us, signs up to an email newsletter, or when a user signs up to use our product/services.

c) Client Business Information – This is the information provided by clients to create AI chatbots that utilise the information to provide the client's end-users with accurate information.

d) End-user Conversation Information – When end-users interact with the AI chatbots, we store the chats for clients to access.

1.2 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

1.3 In this policy, "WebChatBot", "WebChatBot.ai", "we", "us" and "our" refer to WebChatBot.ai, an In-gage Technologies Ltd company. For more information about us, see Section 16.

2. How we use/process your data

In this Section 2 we have set out the general categories of personal data that we may process, the purposes for which we may process the data and the legal basis of the processing.

2.1 Website Information

This includes website visits and usage data gathered through cookies.

a) We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

2.2 Provided Personal Information – this information is gathered when a website visitor fills out an online form, contacts us, signs up to an email newsletter, or when a user signs up to use our product/services.

a) We may process information relating to our relationships with customers and prospective customers, including contact information ("customer relationship data"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers and prospective customers, communicating with customers and prospective customers, keeping records of those communications and promoting our software and services. To help ensure that our promotional communications are relevant, we may use your customer relationship data to create a profile of you; however, such profiling will not invole any automated decision-making. The legal basis for this processing is our legitimate interests, namely the proper management of our customer relationships.

b) We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

c) We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

d) We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

e) In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

f) Please do not supply any other person's personal data to us, unless we prompt you to do so.

2.3 Client Business Information – This is the information provided by clients to create AI chatbots that utilise the information to provide the client's end-users with accurate information.

As part of our services, we process and store customer conversations and business information that our clients upload or authorise to be added from their website/documentation/business. This data is securely stored in compliance with applicable data security regulations. However, please note the following important points:

Data Controller Status: We act solely as a data processor. You, the client, remain the data controller for all information processed through our services.

Data Integrity and Legality: While we commit to storing and processing the data securely, we are not responsible for verifying or ensuring the legality, accuracy, or integrity of the data you provide or authorise us to collect.

Client Responsibility: As the data controller, you are responsible for ensuring that all data uploaded, collected, or processed through our services complies with relevant laws and regulations, including data protection and privacy laws.

Liability Limitation: We shall not be held liable for any legal issues arising from the content, accuracy, or legality of the data you provide or authorise us to process.

By using our services, you acknowledge and agree to these terms regarding data processing and storage. Further information on the data processing for our chatbot services can be found in Clause 6, 'AI Chatbot Data Processing'

2.4 End-user Conversation Information – When end-users interact with the AI chatbots, we store the chats for clients to access.

As part of our AI chatbot services, we process and store conversations between end-users and the chatbots deployed on our clients' platforms. This data is securely stored in compliance with applicable data security regulations. However, please note the following important points:

a) Data Processing Role: We act solely as a data processor for end-user conversation data. You, the client, remain the data controller for all information processed through our chatbot services.
b) Data Collection and Storage: We collect and store chat transcripts, timestamps, user identifiers, and relevant contextual information. This data is retained for a period specified in our agreement with you or until you request its deletion.
c) Data Usage: The stored conversation data is used to provide our services, improve chatbot performance for the specific end-user, and generate insights for the client. We do not use this data for any other purposes without explicit consent.

d) Data Access: The Client has access to the conversation data related to their chatbot deployments. Our employees may access this data only when necessary to provide our services or as required by law.
e) Data Security: We implement robust security measures to protect the stored conversation data, including encryption and access controls. However, no method of transmission over the Internet or electronic storage is 100% secure.
f) End-user Rights: As the data controller, you are responsible for handling end-user rights requests (such as access or deletion requests) related to the conversation data. We will assist you in fulfilling these requests as required by our role as a data processor.
g) Client Responsibility: You are responsible for ensuring that the collection and processing of end-user conversation data through our services comply with relevant laws and regulations, including obtaining necessary consents and providing appropriate privacy notices to end-users.
h) Liability Limitation: While we commit to processing the conversation data securely and in accordance with our agreement, we shall not be held liable for any legal issues arising from the content of the conversations or the legality of the data processing you authorise.

By using our AI chatbot services, you acknowledge and agree to these terms regarding end-user conversation data processing and storage. Further information on the data processing for our chatbot services can be found in Clause 6, 'AI Chatbot Data Processing'

3. Providing your personal data to others

3.1 We use Hubspot as our CRM system, and your customer relationship data will be stored and processed on UK based servers with https Advanced Encryption Standard (AES) 256-bit encryption. We also use Microsoft office suite where data may be processed and housed UK based servers with https Advanced Encryption Standard (AES) 256-bit encryption. AWS Storage of client data is based on location.

3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.3 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. International transfers of your personal data

4.1 We do not systematically transfer personal data from within the European Economic Area (EEA) to any place outside the EEA. In the event that we do so, we will ensure the transfers are protected by appropriate safeguards. Such as ICO-approved transfer agreements.

5. Retaining and deleting personal data

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain your personal data as follows:

b) usage data will be retained for a minimum period of 3 years following the end of the year during which the usage data was collected, and for a maximum period of 1 year following that date;

c) customer relationship data relating to customers with whom we contract will be retained for a minimum period of 5 years following the end of the year during which our last contract with the relevant customer was terminated, and for a maximum period of 1 year following that date;

5.4 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. AI Chatbot Data Processing

Our AI technology is built on a proprietary Large Language Model (LLM) hosted securely within our own infrastructure. Unlike many solutions that rely on third-party models, we maintain full control over our AI system. This approach ensures complete data privacy and security, allows for cost-effective scalability, and gives us the flexibility to fine-tune the model to meet the specific needs of our clients without compromising on confidentiality.

6.1 Data Processing Role

As providers of AI chatbot services, WebChatBot.ai acts as a data processor on behalf of our business clients. Our clients, who integrate our chatbots into their websites or services, remain the data controllers for all information processed through our chatbot services.

6.2 Types of Data Processed

The AI chatbots may process various types of data, including but not limited to:

a) User input (questions, comments, and other text-based interactions)

b) Context data (such as page URLs, documentation, website content, and other data/information shared by the client)

c) User identifiers (such as user IDs or session IDs)

d) Timestamps of interactions

6.3 Purpose of Processing

The data is processed for the following purposes:

a) To provide real-time responses to user queries

b) To improve the chatbot's performance and accuracy. This offers the client opportunities to create prompts which will improve the ‘accuracy’ of the chatbot for the client’s users. We do not retrain our models based on user interactions.

c) To generate insights and analytics for our clients.

d) To maintain conversation history for context and continuity

6.4 Data Collection and Storage

a) Data is collected directly from end-users' interactions with the chatbot.

b) All data is stored securely in cloud-based, geo-located servers, using industry-standard encryption methods and security measures.

c) We retain data for as long as necessary to fulfil the purposes outlined above, or as required by our clients' instructions.

6.5 Data Usage and Access

a) Chatbot data is used solely for the purposes specified by our clients and as necessary to provide and improve our services.

b) Access to data is strictly limited to authorised WebChatBot.ai personnel on a need-to-know basis, with policies/measures in place to ensure the integrity of access control.

c) We do not use client or end-user data to train or improve AI models for other clients.

6.6 Security Measures

We implement robust security measures to protect chatbot data, including:

a) Encryption of data in transit and at rest

b) Regular security audits and penetration testing

c) Strict access controls and authentication procedures

d) Continuous monitoring for potential security threats

6.7 Client Controls

We provide our clients with controls to:

a) Customise data collection and processing settings

b) Export or delete chatbot conversation data

6.8 Compliance with Data Subject Rights

While we do not interact directly with end-users regarding their data rights, we provide tools and assistance to our clients to help them fulfil data subject rights requests, including access, rectification, erasure, and data portability.

6.9 Sub-processors

If we engage any sub-processors to assist in providing our AI chatbot services, we will:

a) Inform our clients and obtain necessary approvals

b) Ensure sub-processors adhere to the same data protection standards

c) Remain fully responsible for the sub-processors' compliance with data protection obligations

Our current list of suppliers and sub-processors includes:

Personal Data:

Google – Email service provider – EU-based servers with Https Advanced Encryption Standard (AES) 256-bit encryption

Hubspot – CRM services - EU based servers with Https Advanced Encryption Standard (AES) 256-bit encryption

Slack – Internal communications - EU based servers with Https Advanced Encryption Standard (AES) 256-bit encryption

Sender – Email and marketing services - EU based servers with Https Advanced Encryption Standard (AES) 256-bit encryption

Stripe – Payment services - EU based servers with Https Advanced Encryption Standard (AES) 256-bit encryption

AI Chatbot Data:

AWS – Data storage and processing - Geo-located servers with Https Advanced Encryption Standard (AES) 256-bit encryption

Microsoft – Internal file storage - UK based servers with Https Advanced Encryption Standard (AES) 256-bit encryption

Rolustech – Development/data science services– ICO-approved data transfer agreement in place

6.10 Data Breach Procedures

In the event of a data breach affecting chatbot data:

a) We will notify affected clients without undue delay

b) We will cooperate fully with clients to address and mitigate the breach

c) We will provide clients with necessary information to fulfill their breach notification obligations

6.11 International Transfers

If chatbot data is transferred internationally:

a) We will ensure appropriate safeguards are in place

b) We will comply with all applicable data transfer regulations

c) We will inform clients of the locations where their data is processed

6.12 AI Ethics and Transparency

We are committed to ethical AI practices and transparency:

a) Our chatbots do not make automated decisions with legal or similarly significant effects

b) We provide information about the general functioning of our AI models upon request

c) We regularly review our AI systems for potential biases or unfair outcomes

By using our AI chatbot services, clients acknowledge and agree to these terms regarding data processing and storage. Clients are responsible for ensuring they have the necessary rights and permissions to process end-user data through our services.

7. Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7.3 We may notify you of significant changes to this policy by email.

8. Your rights

8.1 In this Section 7, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

8.2 Your principal rights under data protection law are:

(a) the right to access;

(b) the right to rectification;

(c) the right to erasure;

(d) the right to restrict processing;

(e) the right to object to processing;

(f) the right to data portability;

(g) the right to complain to a supervisory authority; and

(h) the right to withdraw consent.

8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right

of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

8.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

8.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

8.10 To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

8.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state

of your habitual residence, your place of work or the place of the alleged infringement.

8.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

8.13 You may exercise any of your rights in relation to your personal data by written notice to us.

9. Third party websites

9.1 Our website includes hyperlinks to, and details of, third party websites.

9.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

10. Updating information

10.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

11. Acting as a data processor

11.1 In respect of personal data that we process on behalf of our customers, we do not act as a data controller; instead, we act as a data processor.

11.2 Our legal obligations as a data processor are also set out in the terms and conditions agreement between us and the relevant data controller.

12. About cookies

12.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

12.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

12.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies. This may be utilised to link users to their historical chat logs.

13. Cookies that we use

13.1 We use cookies for the following purposes:

(a) authentication - we use cookies to identify you when you visit our website and as you navigate our website. This is also used for linking users to their historical chat logs.

(b) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;

(c) analysis - we use cookies to help us to analyse the use and performance of our website and services;

(d) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally;

(e) Remarketing – we use cookies to store your visit to our site and provide reminders of our services on other sites.

14. Cookies used by our service providers

14.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

14.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: https://www.google.com/policies/privacy/.

14.3 We use CloudFlare to provide security services relating to our website, and CloudFlare uses cookies for this purpose. ClouldFlare's privacy policy is available at: https://www.cloudflare.com/security-policy/.

15. Managing cookies

15.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a) https://support.google.com/chrome/answer/95647?hl=en (Chrome);

(b) https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences (Firefox);

(c) http://www.opera.com/help/tutorials/security/cookies/ (Opera);

(d) https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies (Internet Explorer);

(e) https://support.apple.com/kb/PH21411 (Safari); and

(f) https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy (Edge).

15.2 Blocking all cookies will have a negative impact upon the usability of many websites.

15.3 If you block cookies, you will not be able to use all the features on our website.

16. Our details

16.1 This website is owned and operated by WebChatBot.ai, and In-gage Technologies Ltd company

16.2 We are registered in England and Wales under registration number 09755541, and our registered office is at 40 Bowling Green Lane, London, England, EC1R 0NE.

16.3 You can contact us:

(a) by post, to the postal address given above;

(b) using our website contact form;

(c) by telephone, on the contact number published on our website from time to time; or

(d) by email, using the email address published on our website from time to time.

17. Regular Policy Reviews & Updates

17.1 Commitment to Regular Reviews

a) WebChatBot.ai is committed to conducting regular reviews of this privacy policy to ensure its continued accuracy, comprehensiveness, and compliance with applicable laws and regulations.

b) We will review this policy at least once every 12 months, or more frequently if required by significant changes in our practices, technologies, or the regulatory landscape.

17.2 Monitoring of Relevant Developments

a) Our legal and compliance team actively monitors developments in data protection laws, AI regulations, and industry best practices that may impact our privacy policy.

b) We engage with industry associations, attend relevant conferences, and consult with legal experts to stay informed about emerging trends and requirements in AI and data protection.

17.3 AI-Specific Considerations

a) Given the rapidly evolving nature of AI technology and its regulation, we pay particular attention to developments that may affect our AI chatbot services.

b) We regularly assess new AI capabilities, potential risks, and ethical considerations to ensure our policy remains relevant and comprehensive.

17.4 Stakeholder Input

a) We value input from our clients, end-users, and other stakeholders. We consider feedback and questions received when reviewing and updating our policy.

b) We may conduct periodic surveys or consultations with key stakeholders to gather insights on privacy concerns and expectations related to our AI services.

17.5 Update Process

a) When updates to the policy are deemed necessary, we follow a rigorous review and approval process involving our legal, technical, and management teams.

b) Any significant changes to the policy will be clearly communicated to our clients and, where appropriate, to end-users.

17.6 Version Control

a) Each version of the privacy policy will be dated and archived.

b) A summary of key changes will be provided with each new version to help users understand what has been updated.

17.7 Notification of Changes

a) We will notify our clients of any material changes to this policy via email or through our service dashboard.

b) Where required by law or contract, we will seek consent from our clients before implementing significant changes that affect the processing of personal data.

17.8 Continuous Improvement

a) Beyond formal reviews, we maintain an open channel for ongoing feedback and suggestions regarding our privacy practices and policy.

b) We are committed to continuously improving our privacy practices and transparently communicating these improvements through our policy updates.

17.9 Alignment with Service Evolution

a) As we enhance our AI chatbot services or introduce new features, we will promptly assess any privacy implications and update this policy accordingly.

b) We strive to ensure that our privacy policy always accurately reflects our current data processing activities and AI capabilities.

By maintaining this commitment to regular reviews and updates, we aim to ensure that our privacy policy remains a current, accurate, and useful resource for understanding how we protect and respect privacy in the context of our AI-driven services.

Date of Last Review: 03/10/2024

Current Version: V1