

Data protection overview.

For a sponsor, employer or compliance reviewer. Your supplier is the coach; CoachNova is their platform and their processor. **Every statement here is published at coachnova.ai/your-data.**

DATA RESIDENCY

EU by default

Session records are stored in the European Union, in Frankfurt, Germany, on every plan. There is no upgrade or add-on required to obtain EU residency.

ROLES

The coach is the controller

The coaching client contracts with the coach, not with CoachNova. The coach is the data controller and CoachNova is their processor, under a data processing agreement accepted at signup.

MODEL TRAINING

Contractually excluded

Session content is not used to train any AI model. No provider in the chain is permitted to train on it, and that restriction is written into the agreements with each of them.

AUDIO

Not retained

Sessions are transcribed and the recording is discarded. No audio is stored at any point.

PROCESSING OUTSIDE THE EU

Some processing takes place outside the European Union, by named sub processors. Each transfer is covered by Standard Contractual Clauses and, where applicable, the EU-US Data Privacy Framework. None of these providers is permitted to train on session data.

The complete list, with each legal entity, country, processing region and transfer mechanism, is at coachnova.ai/legal/subprocessors and is maintained as it changes.

Controls and commitments

- **Security standards.** Data is encrypted at rest and in transit. CoachNova is built to meet GDPR and meets SOC 2 Type II standards. It is not SOC 2 certified, and this document will change when that does.
- **Breach notification.** Any personal data breach is notified to the coach, as controller, without undue delay, under the data processing agreement.
- **Erasure.** Erasure is available under GDPR Article 17: removed from the live system immediately and from backups within 30 days. The coaching client requests it through their coach, who as controller decides what is erased. For the limited processing where CoachNova is itself the controller, such as the coach's account and billing data, requests go to CoachNova directly.
- **Access by CoachNova staff.** Staff do not read session content. Access occurs only when the coach raises a support request, is limited to that request, and is logged. Those logs stay between the coach and CoachNova and are not shared with sponsors or employers.
- **Reporting.** No progress, content or attendance reporting is provided to an employer, sponsor or programme. The coaching relationship is between the coach and their client.

About this document. This is an explanatory summary, provided for information only. It describes how CoachNova worked at the date shown above and may change as the product does. It is not legal advice, it does not form part of any agreement, and no rights may be derived from it. The binding terms are the data processing agreement and the terms of service at coachnova.ai. Questions about these terms: legal@coachnova.ai