

THE CHANGE REPUBLIC

Privacy Policy

Last updated: 29th August 2025

1. Who we are

The Change Republic GmbH (CHE-131.869.164), Rötibodenstrasse 34, 8820 Wädenswil, Switzerland ("we", "our") is the data controller for all processing described in this notice. We offer executive coaching, personal branding and training services, and we also operate an AI coaching tool – CoachTünde.ai – powered by Chatbase. We take the protection of your personal data seriously and comply with the Swiss Federal Act on Data Protection (FADP) and other applicable laws.

2. Which law applies

This notice is based on the Swiss FADP. Where we use service providers or transfer data abroad, we ensure that the protections required by Swiss law (e.g., adequacy decisions or standard contractual clauses) are in place. Some of our providers, including Chatbase, are also certified under the EU General Data Protection Regulation (GDPR) and SOC 2 Type II.

3. What data we collect

Category	Examples	Source
Contact details	name, email, phone, postal address	you / your employer
Coaching data	goals, session notes, assessments	you during sessions
Payment data	invoice amount, payment status, last-4 digits of card / PayPal ID	Stripe, PayPal
Newsletter data	name, email, subscription status	WordPress + Kajabi sign-up form
Technical data (essential cookies)	device & session ID, security/ load-balancing cookies set by WordPress core and essential plugins	your browser
Chatbot conversation data (AI bot only)	text you enter into the chatbot, metadata such as timestamp and session ID	you via your AI bot

We do not run analytics (e.g., Google Analytics) and do not share data with advertising networks.

4. Why we use your data

- We process your data only for clear purposes and on a lawful basis under the FADP:
- Provide and manage coaching, training, speaking and digital products. We use your contact details and coaching data to schedule sessions, deliver services and follow up on outcomes.
- Invoice and receive payments. Payment data is used to issue invoices and process payments.
- Send newsletters you have subscribed to. You can unsubscribe at any time.
- AI coach. When you use CoachTünde.ai, the questions you type are processed so that the chatbot can generate responses. Conversation logs are also used to improve the performance of the chatbot. Chatbase acts as our data processor for this purpose (see section 8 below).
- Service improvement. To improve service quality and fairness, we analyse anonymised prompts in AI systems such as ChatGPT, Claude and Perplexity. We never share identifiable data when doing so.
- Compliance and legal defence. We retain certain data to comply with accounting and tax obligations and to defend against potential legal claims.

THE CHANGE REPUBLIC

Privacy Policy

Last updated: 29th August 2025

5. Legal basis under the FADP

- The legal bases for our processing under the FADP are:
- Contract fulfilment – delivering the services you request.
- Consent – for sending newsletters, recording sessions, and using the AI coach (by starting a conversation with CoachTünde.ai you consent to the processing described here).
- Legitimate interests – improving our services and ensuring IT and AI security.

6. How long we keep data

<i>Data set</i>	<i>Retention period</i>
Coaching / client files	2 years after the engagement ends
Payment & accounting records	10 years (Swiss law)
Newsletter list	until you unsubscribe
Session recordings (if any)	deleted after note-taking or within 365 days
Chatbot conversation data	up to 365 days in Chatbase unless required longer for troubleshooting or legal defence

7. Who receives your data

We use trusted service providers under confidentiality agreements to help us run our business. These include Zoom and WhatsApp (communication), Google Drive (document storage), Stripe and PayPal (payments), Kajabi (email marketing), ChatGPT, Claude and Perplexity (research), Tactiq (AI note-taker), and Chatbase (chatbot hosting). Data used with ChatGPT/Claude/Perplexity is anonymised before processing, and only chatbot conversation data is processed by Chatbase. Other business activities (human coaching, training, events and newsletters) do not use Chatbase.

8. Additional information about Chatbase (CoachTünde.ai)

CoachTünde.ai is hosted on Chatbase, a platform that builds and operates AI chatbots. Chatbase acts as a data processor on our behalf and processes only the text and metadata that you provide to the AI coach.

- Purpose and scope of processing. Chatbase uses the conversation content and technical metadata (such as timestamps and session IDs) to generate responses and to improve the chatbot's performance. Chatbase does not access our payment or newsletter data.
- Compliance certifications. According to Chatbase's Trust Center, the company has achieved GDPR and SOC 2 Type II compliance [trust.chatbase.co](https://www.chatbase.co/trust). Their portal explains that the platform offers detailed compliance documentation and is designed to build confidence in its data-protection capabilities. See for more information <https://www.chatbase.co/security> and <https://www.chatbase.co/legal/privacy>.
- Security measures. Chatbase implements industry-standard safeguards. Its infrastructure controls include log management, unique account authentication and restricted production application access. Product security measures include encryption of data and periodic security self-assessments. Organisational security measures such as performance evaluations and mobile-device-management systems are in place, and internal procedures include cybersecurity insurance and board-level oversight.

THE CHANGE REPUBLIC

Privacy Policy

Last updated: 29th August 2025

8. Additional information about Chatbase (CoachTünde.ai) - continued

- Subprocessors. Chatbase engages a small number of subprocessors to run the service. These currently include Pinecone (vector database hosting), OpenAI (AI services), Supabase (cloud provider) and Vanta (security and compliance monitoring), all located in the United States. These subprocessors may process conversation data solely to provide the AI chat functionality. Chatbase's Trust Center discloses when new subprocessors are added and when privacy-policy addresses change.
- International transfers. Because Chatbase and its subprocessors operate from the United States, chatbot conversation data may be stored outside Switzerland or the EU. Where this occurs, we rely on Swiss Federal Council adequacy decisions or Standard Contractual Clauses to ensure an equivalent level of protection. Chatbase's GDPR and SOC 2 Type II certifications provide additional assurances of compliance with European and international standards.
- Retention. Chatbase stores conversation data for up to 365 days, after which the data is deleted or anonymised unless it is needed longer for troubleshooting or legal defence

By starting a conversation with CoachTünde.ai, you acknowledge that your messages and related metadata will be processed by Chatbase under these terms. If you do not wish to share this data, please refrain from using the AI coach and instead contact us for human-delivered coaching.

9. International transfers

Some of our service providers store data outside Switzerland or the EU (for example, Kajabi – USA; Stripe – USA/EU; PayPal – USA/EU; Chatbase – USA). When transferring data across borders, we rely on the Swiss Federal Council's adequacy decisions or on Standard Contractual Clauses approved by the Federal Council. These mechanisms ensure that your data receives a level of protection equivalent to Swiss law.

10. Security

We and our service providers use technical and organisational measures to protect your data, including HTTPS encryption, role-based access controls and, where available, two-factor authentication. Internally, access to your data is limited to personnel who need it to perform their duties. Chatbase implements additional controls such as log management, unique account authentication, data encryption and regular security assessments. We review our security measures regularly to maintain confidentiality, integrity and availability of your data.

10. Your rights

Under the FADP you have the right to request access, correction, deletion or restriction of your personal data. If processing is based on consent, you may withdraw that consent at any time, though this will not affect the lawfulness of processing carried out before withdrawal. You also have the right to lodge a complaint with the Swiss Federal Data Protection and Information Commissioner.

11. How to contact us

For any privacy enquiries or to exercise your rights, please submit a request via our contact form at thechangerepublic.info/contact-us

12. Changes to this notice

We may update this Privacy Policy from time to time. The latest version is always posted on our website <https://thechangerepublic.info/legal-information/>. Material changes will be communicated through our usual channels (e.g., LinkedIn Company page, website banners or email newsletters).