

## BetterUp AI Privacy Notice

**Effective Date:** May 9, 2025

The Human Transformation Platform™ provided by **BetterUp, Inc.** (“BetterUp”, “we”, or “us”) supports a variety of AI-powered interactive experiences tailored to our Users’ individual needs. BetterUp treats AI as a tool — like a pencil or a calculator – that can help us do our jobs better and faster and enable our Users to receive the best coaching experience possible. We recognize the use of these technologies can raise new privacy and security concerns, and believe the best way to alleviate these concerns is by being transparent and offering Users choices and controls.

This **BetterUp AI Privacy Notice** helps explain the ways in which we collect, use, and share your Personal Data as a part of providing the AI experiences (including but not limited to AI-powered coaching, chats, role play practices and exercises, and narrations), as well as outlines your choices to control the use of your data. This Notice supplements the BetterUp [Privacy Policy](#), and your use of our AI features is governed by the [Acceptable Use Policy](#), [Consumer Terms and Conditions](#), and any enterprise terms agreed to with your sponsoring organization, as applicable, (the “Terms”), so be sure to review these documents carefully as well. Any capitalized terms used but not defined in this BetterUp AI Privacy Notice will have the meaning ascribed to them in the BetterUp Privacy Policy or Terms.

**Jurisdiction-specific privacy notices for the European Union and certain U.S. states, including California, can be found in the [Privacy Policy](#).**

### **1. What Data We Collect**

When we talk about Artificial Intelligence (AI) and Machine Learning (ML), it's important to be specific—especially as these terms are often used interchangeably with tools like ChatGPT and other large language models. At BetterUp, our core coach matching technology—powering experiences across BetterUp Lead, BetterUp Ready, and BetterUp Manage, is grounded in machine learning. It uses pattern recognition to continually improve and personalize over time. Generative AI, enabled through our trusted third-party large language model (LLM) partners, is part of the user experience in BetterUp Grow and BetterUp Manage. In BetterUp Lead, this functionality is available as an optional feature—designed to support, not replace, the human connection at the heart of coaching.

Because the application of AI is so versatile, the Personal Data involved will depend a lot on which experience you are using, so this section is not exhaustive and we work hard to be transparent in the Platform. Most AI experiences within the Platform are initiated and directed by Users. This means that you typically trigger AI functions, interact with them, and provide input that shapes your experience. When you interact with an AI-powered experience, BetterUp collects your user identifier, the initial message to you when you initiate an interactive experience, the messages or prompts you submit (“inputs”), the responses generated by the Service based on your inputs (“outputs”) (if any), and the timestamps of your interactions. Where you have consented to record your sessions, BetterUp may collect your recording to generate a transcript to provide additional insights for you and your Coach.

In certain AI-based chat experiences or exercises, we may offer an optional “Incognito” mode. **If you turn on “Incognito” mode** in the experience interface, BetterUp will stop collecting the content of any future messages you share in your AI-powered coaching, exercise or reflection experience, and the generated responses for the remainder of the session. Although BetterUp can still see that you interacted with the AI-powered experience, we cannot see the content of those interactions, which are erased when the chat session is closed. Incognito may not be available in all AI experiences.

## 2. How We Use Data

The Personal Data collected through the AI-powered experiences will be associated with your BetterUp account and be used in order to provide the services and improve your overall personalized coaching experience. In certain AI experiences, BetterUp may also use information collected from you elsewhere in the Platform, such as your goals, motivations, or assessment results, to tailor chat conversations and reflections, generate personalized prompts and insights, recommend content or coaching resources, and optionally share specific insights with your Coach, if you choose to do so.

In particular, we may use Personal Data to:

- Prompt generative AI models to create personalized chat messages and responses for you;
- Infer from the chat interaction other recommend resources, coaching like interactions, BU modalities that we think might be helpful to you;
- Provide you with deeper reflections and more personalized experiences to give you greater insights into and opportunities for your growth;
- Initiate another chat conversation with you in the future;
- Share some parts of the chat with your dedicated coach, if you choose that option;
- Provide more personalized coach recommendations based on the topics discussed;
- Upon additional consent, provide insights for you and your Coach based on your session recordings; and
- Develop and improve our AI experiences and other products and features.

In accordance with our responsible AI governance framework, we may also monitor and evaluate your free text messages/prompts and outputs to monitor compliance with our Acceptable Use Policy, provide a safe experience, and to ensure your coaching experience stays aligned with your personal and professional coaching goals.

We may also remove Personal Data to create anonymized or aggregated data that **does not identify individual users** to be used for our own research and development, including for conducting safety and efficacy auditing, and to improve our products.

From time to time, the BetterUp Platform may offer new or optional features that collect additional personal data to provide enhanced services and experiences. If additional data is required or shared beyond what is described here, we will explain what is being collected and why at the time of collection.

## 3. How We Share Data

In order to provide AI experiences, we share Personal Data with certain trusted third parties, as outlined in greater detail in Section 4 of the [Privacy Policy](#), such as with vendors, coaches, consultants, and other service providers contractually bound to only process the data on our behalf; in response to lawful requests; or with your consent or direction. In particular, to enable the main functionality of various AI-powered experiences, we share data with our trusted partners that operate generative AI large language models (LLMs) to support the creation of the messages, responses, insights, reflections, and other experiences. However, our AI partners do not store the information we share (beyond a limited timeframe for bias and harm auditing only) and are contractually prohibited from using that data for any of their own AI training or machine learning.

We may share anonymized or aggregated data that **cannot be used to identify individual users** with your employer, our partners and prospects, and other trusted third parties for research, marketing, or other business purposes.

If your access to BetterUp AI is provided by your employer or other sponsoring organization, we may share engagement metrics with your sponsoring organization regarding your activity although no specific details about your content or topics are ever shared in any identifiable format.

#### 4. Your Choices and Rights

Participation in AI-powered experiences requires an explicit opt-in from both the individual User and your sponsoring organization. Where the AI experiences are optionally provided to you by your sponsoring organization, such as within BetterUp Lead, Users must enable 'Personalized AI experiences' in their Account settings. As noted previously, most AI experiences within the Platform are initiated and directed by Users, and at any point you have the choice not to interact with the AI feature. In certain AI experiences, where applicable and available, you also have the opportunity to select "Incognito on" to prevent the collection of the content of your chats. If you wish to have the content of your chats deleted, or the remainder of the personal information collected by BetterUp, please contact [support@betterup.co](mailto:support@betterup.co). Please note that we may retain certain data as permitted or required by law. We may also retain cached or archived copies of data about you for a certain period following a request.

You may opt-out of certain communications relating to the AI experiences, including promotional communications, by following the link and instructions in each communication or by contacting us at [support@betterup.co](mailto:support@betterup.co).

Depending on where you live, you may have additional rights with respect to your data. **Residents of the European Union and U.S. states with applicable privacy laws, like California, should review their respective jurisdiction-specific notices in the [Privacy Policy](#) for full disclosures about their rights and can use our [Privacy Request Form](#) to exercise those rights.**

#### 5. Other Important Information

Your use of the AI features on the Platform is subject to BetterUp's [Privacy Policy](#), so be sure to review that page as well for more details on BetterUp's privacy practices. As with the rest of the Services, the Platform and AI experience is for users 18 years of age or older. You can contact [compliance@betterup.co](mailto:compliance@betterup.co) with any questions about this BetterUp AI Privacy Notice.