

BetterUpAI Privacy Notice

Effective Date: June 27, 2024

The Human Transformation Platform™ provided by **BetterUp, Inc.** (“BetterUp”, “we”, or “us”) supports a variety of interactive experiences, including, but not limited to **LighthouseAI™** - an AI-powered coaching companion. 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 **BetterUpAI 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 chats, practices, 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](#) and [Consumer Terms and Conditions](#) (the “Terms”), so be sure to review these documents carefully as well. Any capitalized terms used but not defined in this BetterUpAI 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

Because LighthouseAI™ 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. When you interact with a LighthouseAI™ chatbot or reflection, BetterUp collects your user identifier, the bot’s initial message to you, the messages you submit, the bot’s responses (if any), and the timestamps of your interactions.

If you turn on “Incognito” mode in the LighthouseAI™ chat interface, BetterUp will stop collecting the content of any future messages you send to the chatbot and the bot’s responses for the remainder of the session. Although BetterUp can still see that you interacted with the chatbot, we cannot see the content of those interactions, which are erased when the chat session is closed.

2. How We Use Data

The Personal Data collected through LighthouseAI™ will be associated with your BetterUp account and be used in order to provide the services and improve your overall coaching experience. In certain LighthouseAI™ experiences, BetterUp may also use information collected from you elsewhere in the Platform, such as your goals, motivations, or assessment results, in the prompts to create LighthouseAI’s insights and inform your AI-powered chats and reflections.

In particular, we may use Personal Data to:

- Prompt generative AI models to create 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; and
- Develop and improve LighthouseAI™ and other products and features.

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 internal AI training and machine learning.

When “Incognito” mode is activated, the content of the conversation cannot be used to improve the user’s experience in any way (for example, it cannot be used to recommend services after the chat is complete or provide insights to the coach). Simply put, the chat content isn’t visible to BetterUp and thus cannot be used in any way, and disappears after the chat is closed.

3. How We Share Data

In order to provide LighthouseAI™, 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 LighthouseAI™, we share data with our partner that operates a generative AI large language model to support the creation of the messages, responses, insights, reflections, and other experiences. However, our AI partner does not store the information we share and is contractually prohibited from using that data for any of its 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.

4. Your Choices and Rights

LighthouseAI™ is an optional experience, and at any point you have the choice not to interact with the chatbot. 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. 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 LighthouseAI™, including promotional communications, by following the link and instructions in each communication or by contacting us at 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

LighthouseAI™ 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, LighthouseAI™ is for users 18 years of age or older. You can contact compliance@betterup.co with any questions about this BetterUpAI Privacy Notice.