

PRIVACY POLICY

Bot Pulse API Platform

Version 1.1 — Effective Date: 1.11.2025

1. Introduction

This Privacy Policy explains how botpulse.io ("Bot Pulse", "we", "us", or "our"), incorporated in Dubai, UAE, collects, uses, stores, and protects personal data in connection with the Bot Pulse API Platform ("Platform") and related services.

We serve customers globally, including in the European Union/EEA, the United States, and Asia. We process personal data of EU/EEA residents in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") pursuant to its extraterritorial scope under Article 3. We also comply with applicable data protection laws in other jurisdictions where we operate, including the DIFC Data Protection Law 2020.

This Policy applies to personal data processed through use of the Platform, API, and related communications. It does not apply to data processed by third-party services you use alongside the Platform.

2. Identity and Contact Details

Controller: botpulse.io

Registered address: Dubai, UAE, Al Shohada Road, Ras Al Khaimah

License Number: 47021922

Privacy contact: contact@botpulse.io

Legal contact: contact@botpulse.io

For enterprise Users with an active Data Processing Agreement (DPA), the DPA governs data processing activities to the extent of any conflict with this Policy. Enterprise DPAs are available on request at contact@botpulse.io.

3. Personal Data We Collect

3.1 Account and Registration Data

When you register an account on the Platform, we collect:

- Email address
- Name and organizational affiliation (where provided)
- Third-party account identifiers where OAuth login is used
- IP address at time of registration

3.2 Billing and Payment Data

To process payments, we collect:

- Payment method details (processed by our payment provider — Bot Pulse does not store raw card data)
- Transaction and purchase history
- Billing address where required for applicable tax compliance

3.3 Usage and Technical Data

When you use the API and Platform, we automatically collect:

- API request logs (volume, endpoint, timestamp, response code — not request payload content)
- IP addresses associated with API requests
- Credentials usage and session identifiers
- Platform interaction data (pages visited, features accessed, session duration)
- Error logs and diagnostic data

3.4 Communications Data

If you contact us by email, support chat, or other means, we retain records of those communications for support and compliance purposes.

3.5 Data We Do Not Collect

We do not collect, store, or process the content of HTTP requests or responses routed through the TLS proxy layer. API request payloads are not retained beyond what is necessary for real-time service delivery. We do not process special categories of personal data as defined in GDPR Article 9.

4. Purposes and Legal Bases for Processing

Performance of a contract (GDPR Art. 6(1)(b)): Account registration, API credential provisioning, billing, and service delivery. This is the primary basis for processing account, payment, and usage data.

Legitimate interests (GDPR Art. 6(1)(f)): Security monitoring and fraud prevention; Platform improvement and analytics; abuse detection and AUP enforcement; communications about service updates. We balance these interests against your rights and apply appropriate safeguards.

Legal obligation (GDPR Art. 6(1)(c)): Tax and accounting records; responses to lawful requests from competent authorities; compliance with applicable law.

Consent (GDPR Art. 6(1)(a)): Where we send optional marketing communications. You may withdraw consent at any time by contacting contact@botpulse.io or using the unsubscribe link in communications.

5. Data Retention

We retain personal data only for as long as necessary for the purposes described in this Policy, or as required by applicable law:

- Account data: duration of the account and 3 years after account closure for legal and contractual compliance.
- Billing and transaction records: 7 years from the date of transaction in accordance with applicable accounting and tax law.

- API request metadata (IP, timestamp, endpoint): up to 90 days, used for security monitoring and abuse detection.
- Aggregated, anonymized usage analytics: up to 24 months for service improvement and capacity planning.
- Support communications: up to 3 years from the date of last communication.
- Security incident records: up to 5 years where legally required.

Upon account closure, personal data is deleted or anonymized within 90 days except where longer retention is required by law. You may request earlier deletion subject to our legal obligations.

6. Data Sharing and Recipients

We do not sell your personal data. We share personal data only in the following circumstances:

6.1 Sub-processors

We engage trusted third-party service providers (sub-processors) to support our operations, including cloud infrastructure, payment processing, authentication, analytics, monitoring, and transactional email delivery. All sub-processors are bound by data processing agreements and are required to implement appropriate technical and organizational security measures. A current list of our sub-processors is available on request at contact@botpulse.io.

6.2 Organization / Enterprise Account Sharing

Where a User accesses the Platform under an enterprise organization account, we may share that User's email address and usage data with the enterprise account holder for access management, billing allocation, and compliance verification.

6.3 Legal and Regulatory Disclosure

We may disclose personal data to competent authorities, courts, or law enforcement where required by applicable law, court order, or regulatory obligation. Where legally permitted, we will notify affected Users of such requests.

6.4 Business Transfers

In the event of a merger, acquisition, restructuring, or sale of assets, personal data may be transferred to the relevant successor entity subject to equivalent data protection commitments. We will notify Users of any such transfer in advance where required by law.

7. International Data Transfers

botpulse.io operates from Dubai and serves customers globally. Transfers of personal data may occur between Dubai, the EU/EEA, the United States, and Asia-Pacific jurisdictions.

For transfers of EU/EEA personal data outside the EEA, we rely on the following safeguards:

- Transfers to countries with a European Commission adequacy decision;
- Standard Contractual Clauses (SCCs) adopted under GDPR Article 46(2)(c), including supplementary measures as required following CJEU Case C-311/18 (Schrems II);
- The DIFC-EU SCCs framework where applicable.

For US-based customers, Bot Pulse acknowledges applicable US state privacy laws including the California Consumer Privacy Act (CCPA/CPRA) where relevant. US-specific privacy rights and disclosures are available on request at contact@botpulse.io.

For customers in Asia-Pacific jurisdictions (including Japan, South Korea, Singapore, and India), Bot Pulse applies GDPR-standard protections as a baseline. Jurisdiction-specific addenda are available on request for enterprise customers.

Details of transfer mechanisms applicable to specific sub-processors are available at contact@botpulse.io.

8. Security

We implement appropriate technical and organizational measures to protect personal data, including:

- Encryption of data in transit (TLS 1.2 or higher) and at rest
- Access controls and authentication requirements for internal systems
- Regular security assessments and vulnerability management
- Incident response procedures with defined escalation and notification timelines
- Employee and contractor training on data protection obligations

In the event of a personal data breach likely to result in risk to your rights and freedoms, we will notify the relevant supervisory authority within 72 hours and will notify affected individuals without undue delay where required by applicable law.

9. Your Rights

Depending on your jurisdiction, you may have the following rights in relation to your personal data:

- Right of access: request a copy of the personal data we hold about you.
- Right to rectification: request correction of inaccurate or incomplete data.
- Right to erasure: request deletion of your personal data, subject to our legal obligations.
- Right to restriction of processing: request that we restrict processing of your data in certain circumstances.
- Right to data portability: receive your personal data in a structured, commonly used, machine-readable format.
- Right to object: object to processing based on legitimate interests.
- Right to withdraw consent: where processing is based on consent, withdraw that consent at any time without affecting the lawfulness of prior processing.
- US residents (California): right to know, right to delete, right to opt out of sale (we do not sell personal data), and right to non-discrimination under CCPA/CPRA.

To exercise any of these rights, contact contact@botpulse.io. We will respond within one month of receipt (or within three months for complex or numerous requests, with notification of extension within one month). We may verify your identity before processing your request. No fee is charged for reasonable requests.

10. Cookies and Tracking Technologies

The Platform uses cookies and similar technologies for the following purposes:

- **Strictly necessary cookies:** required for Platform functionality, session management, and security. These cannot be disabled.
- **Analytical cookies:** used to understand how Users interact with the Platform and to improve performance. These are anonymized where possible.
- **Preference cookies:** used to remember your settings and preferences.

We do not use cookies for advertising or cross-site tracking. You can manage cookie preferences through your browser settings. Disabling non-essential cookies will not impair core Platform functionality.

11. Minors

The Platform and API are not intended for use by individuals under the age of 18 (or the applicable age of majority in your jurisdiction). We do not knowingly collect personal data from minors. If you believe we have inadvertently collected data from a minor, please contact contact@botpulse.io and we will delete it promptly.

12. Changes to This Policy

We may update this Privacy Policy from time to time. We will notify you of material changes by email or prominent notice on the Platform at least 30 days before the changes take effect. The version date at the top of this document reflects the most recent update. Continued use of the Platform after the effective date constitutes acceptance.

13. Contact

For questions, requests, or concerns regarding this Policy or our data processing practices:

Privacy enquiries: contact@botpulse.io

Legal / DPA requests: contact@botpulse.io

Post: botpulse.io, DIFC, Dubai — Al Shohada Road, Ras Al Khaimah, Dubai, UAE

botpulse.io

Dubai, UAE

Platform: <https://botpulse.io>

Version 1.1 — 1.11.2025. This document supersedes all prior versions.