

COPE.Solutions - Privacy Policy

Last Updated: February 12, 2026

Effective Date: February 12, 2026

Version: 1.0

1. Introduction

1.1 About This Policy

This Privacy Policy explains how COPE Solutions (“Company”, “we”, “us”, “our”) collects, uses, discloses, and protects your personal data when you use the COPE.Solutions platform (“Service”, “Platform”).

1.2 Our Commitment

We are committed to protecting your privacy and handling your data in an open and transparent manner. We process personal data in compliance with the General Data Protection Regulation (GDPR) and other applicable data protection laws.

1.3 Scope

This Policy applies to:

- Users who register and use the COPE.Solutions platform
 - Visitors to our website
 - Business contacts whose data is processed as prospects
 - Any other individuals whose data we process
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2. Data Controller Information

COPE Solutions

Email: privacy@cope.solutions

Data Protection Officer: dpo@cope.solutions

For all privacy-related inquiries, please contact us using the information above.

3. Data We Collect

3.1 Account and Registration Data

When you register for COPE.Solutions, we collect:

- Full name
- Email address
- Company name
- Password (encrypted)
- Role and permissions

3.2 ICP Configuration Data

To provide prospect intelligence, we collect your Ideal Customer Profile:

- Target industries and verticals
- Company size preferences (employees, revenue)
- Geographic targeting (cities, regions, countries)
- Job titles and decision-maker roles
- Technology stack preferences
- Growth signals and buying triggers
- Pain points and desired outcomes
- Negative/exclusion criteria

3.3 Platform Usage Data

We automatically collect:

- Login timestamps and session duration
- Pages viewed and features used
- Prospect interactions (views, downloads, feedback)
- ICP modification history
- Search queries within the platform

3.4 Payment Data

For subscription processing, we collect:

- Billing address
- Payment method details (processed securely via Stripe)
- Transaction history
- Invoice records

3.5 Communication Data

We store:

- Support inquiries and responses
- Chat interactions with our AI assistant (COPE Expert Copilot)
- Email communications
- Feedback submissions

3.6 Prospect Data (B2B Contact Information)

As part of our prospect intelligence service, we process:

- Business email addresses
- Professional names and job titles
- Company names and domains
- Professional social profiles (LinkedIn)
- Publicly available business information
- Our AI-generated intelligence reports and scores

4. How We Use Your Data

4.1 Service Delivery

We use your data to:

- Provide and maintain the COPE.Solutions platform

- Deliver prospects matching your ICP criteria
- Generate intelligence reports and BANT evaluations
- Calculate Fit/Opportunity/Risk scores
- Integrate with your CRM (CREDEMA) when configured

4.2 Service Improvement

We use data to:

- Improve prospect targeting accuracy
- Enhance our AI models and algorithms
- Analyze platform usage patterns
- Develop new features and capabilities
- Train our AI systems on anonymized patterns

4.3 AI Assistant Improvement

Our COPE Expert Copilot AI assistant:

- Stores chat interactions for quality improvement
- Learns from frequently asked questions
- Improves responses based on feedback signals
- Does NOT share your specific queries with other clients
- May use anonymized patterns for general improvement

4.4 Communication

We use your contact data to:

- Send service-related notifications
- Provide customer support
- Share product updates and announcements
- Send marketing communications (with consent)

4.5 Legal and Compliance

We process data to:

- Comply with legal obligations
- Respond to lawful requests from authorities
- Protect our legal rights and interests
- Prevent fraud and abuse

5. Legal Basis for Processing

Under GDPR, we process personal data based on:

5.1 Contract Performance (Article 6(1)(b))

- Account creation and management
- Service delivery and prospect generation
- Payment processing
- Customer support

5.2 Legitimate Interests (Article 6(1)(f))

- Service improvement and analytics

- Security and fraud prevention
- AI model training on anonymized data
- Business communications

5.3 Consent (Article 6(1)(a))

- Marketing communications
- Optional data collection
- Cookies (non-essential)

5.4 Legal Obligation (Article 6(1)(c))

- Tax and accounting records
- Regulatory compliance
- Legal requests and proceedings

6. Data Sharing and Disclosure

6.1 Service Providers

We share data with trusted third parties:

Provider	Purpose	Data Shared
Stripe	Payment processing	Billing data
Abacus.AI	AI/ML processing	Anonymized patterns
CREDEMA	CRM integration	Prospect data (when configured)
Cloud hosting	Infrastructure	All platform data (encrypted)

6.2 Legal Requirements

We may disclose data:

- To comply with legal obligations
- In response to valid legal requests
- To protect our rights, privacy, safety, or property
- In connection with legal proceedings

6.3 Business Transfers

If COPE Solutions is involved in a merger, acquisition, or sale of assets, your data may be transferred. We will provide notice before data becomes subject to a different privacy policy.

6.4 With Your Consent

We may share data for other purposes with your explicit consent.

6.5 No Sale of Personal Data

We do NOT sell your personal data to third parties.

7. Data Retention

7.1 Retention Periods

Data Category	Retention Period
Account data	Duration of account + 90 days
ICP configurations	Duration of account + 90 days
Prospect data	Duration of account + 90 days
Payment records	7 years (legal requirement)
Chat logs (AI assistant)	12 months
Usage analytics	24 months (anonymized thereafter)
Feedback data	Duration of account + 90 days

7.2 Deletion Process

After the retention period:

- Personal data is securely deleted or anonymized
- Backups are purged within 30 days
- Aggregated statistics may be retained indefinitely

7.3 Anonymization

We may anonymize data (removing all identifying information) for:

- Statistical analysis
- AI model training
- Service improvement
- Industry benchmarking

8. Your Rights

Under GDPR and applicable laws, you have the right to:

8.1 Access (Article 15)

Request a copy of your personal data and information about how it is processed.

8.2 Rectification (Article 16)

Request correction of inaccurate or incomplete personal data.

8.3 Erasure (Article 17)

Request deletion of your personal data (“right to be forgotten”) when:

- Data is no longer necessary

- You withdraw consent
- You object to processing
- Data was unlawfully processed

8.4 Restriction (Article 18)

Request limitation of processing in certain circumstances.

8.5 Data Portability (Article 20)

Receive your data in a structured, commonly used format and transmit it to another controller.

8.6 Objection (Article 21)

Object to processing based on legitimate interests, including profiling.

8.7 Automated Decision-Making (Article 22)

Not be subject to decisions based solely on automated processing with legal or significant effects.

8.8 Withdraw Consent

Withdraw consent at any time (without affecting prior lawful processing).

8.9 Exercising Your Rights

To exercise any right, contact us at privacy@cope.solutions. We will respond within 30 days.

9. Data Security

9.1 Technical Measures

We implement:

- Encryption in transit (TLS 1.3)
- Encryption at rest (AES-256)
- Secure authentication (bcrypt password hashing)
- Regular security assessments
- Access controls and logging

9.2 Organizational Measures

We maintain:

- Data protection policies and procedures
- Employee training on data protection
- Incident response procedures
- Vendor security assessments

9.3 Breach Notification

In case of a data breach:

- We will notify affected individuals within 72 hours
 - We will notify supervisory authorities as required
 - We will document the breach and response measures
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10. International Transfers

10.1 Transfer Mechanisms

When transferring data outside the EEA, we ensure adequate protection through:

- Standard Contractual Clauses (SCCs)
- Adequacy decisions
- Binding Corporate Rules (where applicable)

10.2 Transfer Locations

Your data may be processed in:

- European Union member states
 - United States (with appropriate safeguards)
 - Other jurisdictions with adequate protection
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11. Cookies and Tracking

11.1 Essential Cookies

We use cookies necessary for:

- Authentication and security
- Session management
- User preferences

11.2 Analytics Cookies

With your consent, we use cookies for:

- Usage analytics
- Performance monitoring
- Feature improvement

11.3 Cookie Management

You can manage cookie preferences through:

- Browser settings
 - Our cookie consent banner
 - The Settings page in your account
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12. AI and Automated Processing

12.1 AI-Powered Features

COPE.Solutions uses AI for:

- Prospect discovery and evaluation
- BANT qualification scoring
- Fit/Opportunity/Risk assessment
- Intelligence report generation
- The COPE Expert Copilot chat assistant

12.2 AI Data Processing

Our AI systems:

- Process business data to generate prospects
- Learn from feedback to improve accuracy
- Use anonymized patterns for model improvement
- Do NOT make fully automated decisions with legal effects

12.3 Human Oversight

- Prospect selection algorithms are regularly reviewed
- Clients can provide feedback on prospect quality
- Support team can intervene on AI-generated content

12.4 Transparency

We provide:

- Explanation of how prospects are scored
 - Visibility into pipeline metrics
 - Selection justification for each prospect
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13. Prospect Data Considerations

13.1 Source of Prospect Data

Prospect data is derived from:

- Publicly available business information
- Professional networking platforms
- Company websites and press releases
- Business databases and directories
- AI-generated analysis and enrichment

13.2 Legitimate Interest Basis

We process prospect data based on legitimate interests in B2B marketing, specifically:

- Facilitating business relationships
- Enabling relevant business communications
- Supporting economic activity

13.3 Prospect Rights

Individuals identified as prospects may:

- Request access to data held about them
 - Request correction or deletion
 - Object to processing
 - Contact us at privacy@cope.solutions
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14. Children's Privacy

COPE.Solutions is a B2B service not directed at children. We do not knowingly collect data from anyone under 18 years of age. If we learn we have collected such data, we will delete it promptly.

15. Changes to This Policy

15.1 Updates

We may update this Privacy Policy periodically. Changes will be:

- Posted on the Platform with the new effective date
- Communicated via email for material changes
- Marked with version number and change date

15.2 Review

We recommend reviewing this Policy periodically for any changes.

16. Contact Us

16.1 Privacy Inquiries

For privacy-related questions or to exercise your rights:

Email: privacy@cope.solutions

Data Protection Officer: dpo@cope.solutions

16.2 Complaints

You have the right to lodge a complaint with a supervisory authority if you believe your data protection rights have been violated.

16.3 General Contact

COPE Solutions

Website: <https://cope.solutions>

Support: support@cope.solutions

17. Summary of Key Points

Topic	Summary
Data we collect	Account info, ICP settings, usage data, payment info, chat logs
Why we collect it	Service delivery, improvement, support, legal compliance
Who we share with	Service providers (Stripe, Abacus.AI, CRE-DEMA), legal authorities when required
Your rights	Access, rectification, erasure, portability, objection, withdraw consent
Data security	Encryption, access controls, regular assessments, breach notification
Retention	Active account + 90 days (varies by data type)
AI processing	Prospect scoring, chat assistant, model improvement (with transparency)
Contact	privacy@cope.solutions

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