If you are an EU, UK, or Swiss resident, our EU/EEA-Specific Privacy Notice applies to you.

Global Privacy Policy

Effective date: October 12, 2026

This Global Privacy Policy ("Privacy Policy") explains how Chatfuel ("Chatfuel", "we", "us", "our") collects, uses, shares, and protects Personal Data when individuals access or use our Services. This Privacy Policy reflects the legal requirements and regulatory expectations, including GDPR, UK GDPR, Swiss FADP, CCPA/CPRA, VCDPA, CPA, UCPA, and emerging global privacy norms, including key data protection regulations across Latin America such as:

- LGPD (Brazil);
- Federal Law on Protection of Personal Data Held by Private Parties (Mexico);
- Ley de Protección de los Datos Personales (Argentina);
- Ley N°19.628 Sobre Protección de la Vida Privada (Chile, with ongoing modernization updates);
- Ley Estatutaria 1581 (Colombia) and its implementing decrees;
- Ley N°29733 – Ley de Protección de Datos Personales (Perú);
- and analogous data protection frameworks across other jurisdictions where applicable.

By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.

Remember that your use of Chatfuel's Services is at all times subject to our Terms of Use, which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions set forth in the Terms of Use.

What this Privacy Policy Covers

We process Personal Data both (1) as a data controller — for our own internal purposes such as account management, security, analytics, support and marketing of our Services; and (2) as a data processor acting strictly under the instructions of our customers who use the Chatfuel service (the "Service").

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. "Personal Data" means any information that identifies or relates to a particular individual and also includes information referred to as "personally identifiable information" or "personal information" under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don't own or control or people we don't manage. Additionally, this Privacy Policy does not cover Personal Data that we process on behalf of our customers when we act as a service provider to those customers.

When we act as a processor, we process Customer Personal Data solely to provide the Service, do not use such data for our own purposes, and comply with all obligations as described in our Data Processing Addendum (DPA).

This Privacy Policy applies only to processing activities in which Chatfuel acts as a data controller.

For processing conducted on behalf of customers, the DPA governs such activities.

Personal Data

Categories of Personal Data We Collect

This chart details the categories of Personal Data that we collect and have collected over the past 12 months:

Category of Personal Data	**Examples of Personal Data We Collect**	**Categories of Third Parties With Whom We Share this Personal Data:**
Profile & Contact Data	• First and last name • Email • Phone number • Mailing Address	Service Providers
Account & Authentication Data	• Login credentials • Access tokens • Platform settings	Service Providers
Payment Data	• Payment card type • Last 4 digits of payment card • Billing address, phone number, and email	Service Providers (specifically our payment processing partners)
Device & Technical Data	• IP address • Device ID • Domain server • Type of device/operating • system/browser used to access the Services • Unique identifiers	• Service Providers • Advertising Partners • Analytics Partners
Interaction & Usage Data	• User activity logs • Dashboard events • Bot-building interactions	Service Providers
Analytics & Cookies Data	• Behaviour analytics • Session data • Traffic source • Marketing attribution	Service Providers
Communications & Support Data	• Emails • Chat transcripts • Metadata	Service Providers

Web Analytics	• Web page interactions • Referring webpage/source through which you accessed the Services	• Service Providers • Advertising Partners • Analytics Partners
Geolocation Data	IP address-based location information	• Service Providers • Advertising Partners • Analytics Partners
Shipping Data	• Shipping address	Service Providers
Social Network Data	• User name • Language preferences • Gender • Timezone • Profile picture	Service Providers
Consumer Demographic Data	Gender	Service Providers
Inferences Drawn From Other Personal Data Collected	Profiles reflecting user attributes or behavior	Service Providers
Other Identifying Information that You Voluntarily Choose to Provide	Identifying information in emails or letters you send us	Service Providers
Special Categories (Sensitive Data)	Chatfuel does not intentionally collect or process Special Categories of Personal Data (including health information) as a Controller. Any processing of such data may occur only when a Customer acts as a Controller and submits or collects such data through the Service, in which case Chatfuel acts exclusively as a Processor and processes such data under the Customer's instructions and the DPA.	

How We Collect Personal Data

We collect Personal Data about you from the following categories of sources:

- When you provide such information directly to us:
  - When you create an account or use our interactive tools and Services;
  - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires;
  - When you send us an email or otherwise contact us.
- When you use the Services and such information is collected automatically:
  - Through Cookies (defined in the "Tracking Tools and Opt-Out" section below);
  - If you use a location-enabled browser, we may receive information about your

location;
    - Third Parties
- Vendors
    - We may use analytics providers to analyze how you interact and engage with the Services, or third parties may help us provide you with customer support.
- Advertising Partners
    - We receive information about you from some of our vendors who assist us with marketing or promotional services related to how you interact with our websites, applications, products, Services, advertisements or communications.
- Social Networks
    - If you provide your social network account credentials to us or otherwise sign in to the Services through a third-party site or service, some content and/or information in those accounts may be transmitted into your account with us.
- Customer Content (Controller Data Uploaded Into the Service)
    - As you use the Service, you may import, upload, or otherwise submit Personal Data that you have collected from your users, customers, patients, prospective customers, followers, subscribers, or other individuals ("Subscribers"). Customer Content also includes any User-Generated Content, as defined in our Terms of Service;
    - We process such Customer Content **solely on your behalf and strictly in accordance with your documented instructions**, and only for the purpose of providing the Service.

We have **no direct relationship** with your Subscribers or any individual whose data you upload into the Service. You are responsible for ensuring that you have:

- a lawful basis to collect and process such Personal Data,
- provided all required notices, and
- informed such individuals about the use of the Service, this Privacy Policy, and the Data Processing Addendum.

For details on how we process Customer Content as a Processor, please see our Data Processing Addendum (DPA).

Our Commercial or Business Purposes for Collecting Personal Data

- **Providing, Customizing and Improving the Services:**
    - Creating and managing your account or other user profiles;
    - Processing orders or other transactions; billing;
    - Providing you with the products, services or information you request;
    - Meeting or fulfilling the reason you provided the information to us;
    - Providing support and assistance for the Services;
    - Improving the Services, including testing, research, internal analytics and product development;
    - Personalizing the Services, website content and communications based on your preferences;
    - Doing fraud protection, security and debugging;
    - Carrying out other business purposes stated when collecting your Personal Data or as otherwise outlined in applicable data privacy laws, such as the California Consumer Privacy Act (the "CCPA").
- **Marketing the Services**

    - Marketing and selling the Services.
- **Corresponding with You**
    - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Chatfuel or the Services;
    - Sending emails and other communications according to your preferences or that display content that we think will interest you.
- **Meeting Legal Requirements and Enforcing Legal Terms**
    - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities;
    - Protecting the rights, property or safety of you, Chatfuel or another party;
    - Enforcing any agreements with you;
    - Responding to claims that any posting or other content violates third-party rights;
    - Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated, or incompatible purposes without providing you notice.

How We Share Your Personal Data

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may apply to you, some of these disclosures may constitute a "sale" of your Personal Data. For more information, please refer to the state-specific sections below.

- **Service Providers.** These parties help us provide the Services or perform business functions on our behalf. They include:
    - Hosting, technology and communication providers;
    - Security and fraud prevention consultants;
    - Support and customer service vendors;
    - Product fulfillment and delivery providers
    - AI processing providers that power the AI features of the Services (currently OpenAI and Google).
- **Payment processors.** Our payment processing partner, Stripe, Inc. ("Stripe"), collects your voluntarily provided payment card information necessary to process your payment. Please see Stripe's terms of service and privacy policy for information on its use and storage of your Personal Data.
- **Advertising Partners.** These parties help us market our services and provide you with additional offers that may interest you. They include:
    - Ad networks;
    - Marketing providers.
- **Analytics Partners.** These parties provide analytics on web traffic or usage of the Services. They include:
    - Companies that track how users found or were referred to the Services;
    - Companies that track how users interact with the Services.
- **Parties You Authorize, Access or Authenticate**
    - Third parties you access through the Services, including applications you authorize to connect to your account (see "Connected Applications and AI Assistants" below);
    - Social media services;

- Other users.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not share such data in a manner that could identify you.

Connected Applications and AI Assistants

You may connect third-party applications to your Chatfuel account, including AI assistants that access the Services through the Chatfuel Model Context Protocol (MCP) server at https://mcp.chatfuel.com. When you do so, the application acts on your behalf and can read and change the same data that you can access in your account, within the limits described in our documentation.

Data that a connected application retrieves from the Services is transmitted to and processed by the provider of that application under its own terms and privacy policy. We do not control that provider, and this Privacy Policy does not apply to its processing.

The Chatfuel MCP server does not store your API keys, access tokens, the content of your requests or responses, or any Subscriber data. It keeps technical logs (time, operation name, result, and duration) for a limited period, after which they are deleted automatically. Where you connect an application by signing in with Chatfuel, we store a hashed token record for the duration of the authorization, which expires automatically.

Use of the Services through a connected application is recorded in our product analytics in the same way as use of the dashboard.

You can revoke an application’s access at any time by deleting the API key or disconnecting the application in your account settings. Disconnecting Chatfuel within the application itself does not revoke its access in Chatfuel.

AI Features

Some features of the Services use large language models to generate content and responses. These features are provided with the help of OpenAI and Google (Gemini, via Google Cloud), which process the data you submit to those features on our behalf as service providers. Chatfuel does not train its own AI models. A current list of our sub-processors is available at https://chatfuel.com/files/TermsOfUse.pdf.

Tracking Tools and Opt-Out

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, "Cookies") to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data — usually text files – placed on your computer, tablet, phone, or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support "Do Not Track" requests sent from a browser at this time.

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable;
- Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region);
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services, and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns to help us improve our campaigns and the Services' content for those who engage with our advertising. For example, Google Inc. ("Google") uses cookies in connection with its Google Analytics services. Google's ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt out of Google's use of Cookies by visiting the Google advertising opt-out page at https://adssettings.google.com or the Google Analytics Opt-out Browser Add-on at https://tools.google.com/dlpage/gaoptout/. We also use PostHog, a product analytics platform provided by PostHog, Inc. ("PostHog"), to understand how visitors and users interact with our Services, including through event analytics and session analysis. PostHog's processing of information collected through our Services is subject to PostHog's Privacy Policy, available at https://posthog.com/privacy;
- Retargeting/Advertising Cookies. Retargeting/Advertising Cookies collect data about your online activity and identify your interests so that we can provide advertising that we believe is relevant to you.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.
To explore what Cookie settings are available to you, look in the "preferences" or "options" section of your browser's menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit https://allaboutcookies.org.

Data Security and Retention

We seek to protect your Personal Data from unauthorized access, use, and disclosure using appropriate physical, technical, organizational, and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure. Our Services and the Personal Data we hold are hosted on Google Cloud infrastructure in the United States.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services. In some cases we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

Personal Data of Children

As noted in the Terms of Use, we do not knowingly collect or solicit Personal Data about children under 13 years of age; if you are a child under the age of 13, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 13 years of age, we will delete that information as quickly as possible. If you believe that a child under 13 years of age may have provided Personal Data to us, please contact us at tos@chatfuel.com.

California Resident Rights

If you are a California resident, you have the rights set forth in this section. The California Consumer Privacy Act of 2018 ("CCPA") and the California Privacy Rights Act of 2020 (CPRA) provide additional rights to know, delete, and opt out, and require businesses collecting or disclosing personal information to provide notices and means to exercise rights.

Please see the "Exercising Your Rights" section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers' end users or

employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at tos@chatfuel.com.

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you;
- The categories of sources from which that Personal Data was collected;
- The business or commercial purpose for collecting or selling your Personal Data;
- The categories of third parties with whom we have shared your Personal Data;
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third party recipient.

To exercise any of your remaining rights that have not been fulfilled via the disclosures within this privacy policy, please contact us at tos@chatfuel.com. California residents can designate an authorized agent to submit requests on their behalf.

Correction

Subject to certain exceptions, you have the right to correct inaccurate Personal Information we maintain about you. To exercise your right to correct inaccurate personal information, please contact us at tos@chatfuel.com.

Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

You have the right to opt out of the sale or sharing of your personal information, including for cross-context behavioral advertising.

You may submit a Delete Request by email at: tos@chatfuel.com.

Please note that Chatfuel may retain a record of your request to delete your personal information.

Exercising Your Rights

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data (personal ID, email address, last 4 digits and expiring date of the payment card, bot URL, customer page URL, etc.), and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request by email at: tos@chatfuel.com.

You may also authorize an agent (an "Authorized Agent") to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they request it on your behalf.

Personal Data Sales Opt-Out and Opt-In

We do not sell your Personal Data for monetary consideration. Some of our advertising and analytics technologies (such as the Facebook Pixel) may involve the "sharing" or "sale" of Personal Data for cross-context behavioral advertising as those terms are defined under certain U.S. state privacy laws, including the CCPA/CPRA. Where required by applicable law, we obtain your consent before setting such technologies and/or provide you with the ability to opt out. You can manage your choices at any time through our cookie banner and the opt-out options described in the "Tracking Tools and Opt-Out" section.

We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates, or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

Nevada Resident Rights

Nevada law (NRS 603A.340) requires each business to establish a designated request address where Nevada consumers may submit requests directing the business not to sell certain kinds of personal information that the business has collected or will collect about the consumer. A sale under Nevada law is the exchange of personal information for monetary consideration by the

business to a third party for the third party to license or sell the personal information to other third parties. We do not currently sell personal data as defined under Nevada law. If you are a Nevada consumer and wish to submit a request relating to our compliance with Nevada law, you can exercise this right by contacting us at tos@chatfuel.com with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account.

Virginia Resident Rights

If you are a resident of Virginia, this section provides information about your privacy rights under the Virginia Consumer Data Protection Act ("VCDPA").

Subject to certain limitations, the VCDPA affords you the following rights:

- to confirm whether we are processing your personal information, and to access that personal information;
- to receive your personal information in a portable and readily usable format;
- to correct inaccuracies in your personal information;
- to delete your personal information;
- to opt out of the processing of your personal information for targeted advertising, sale to third parties, or profiling where there is a legal or similarly significant effect on you.

You may exercise these rights by contacting us at tos@chatfuel.com and by updating your cookie preferences.

Colorado, Connecticut, Utah, and Other U.S. State Privacy Rights

If you are a resident of Colorado, Connecticut, Utah, or another U.S. state that has enacted a comprehensive consumer privacy law, you may have rights similar to those described in the Virginia section above, including the rights to confirm and access your personal data, correct inaccuracies, delete your data, obtain a portable copy, and opt out of the processing of your personal data for targeted advertising, the sale of personal data, and certain profiling.

Where the applicable law provides for it, you also have the right to appeal our decision regarding a privacy request. To exercise these rights or to appeal a decision, contact us at tos@chatfuel.com. If we deny your appeal, you may contact your state Attorney General.

Latin America Privacy Rights

Brazil (LGPD). If you are located in Brazil, our processing of your personal data is subject to the Lei Geral de Proteção de Dados (LGPD). You have the right to: confirmation that we process your data; access to your data; correction of incomplete, inaccurate or outdated data; anonymization, blocking or deletion of unnecessary or excessive data; portability; deletion of data processed with your consent; information about the entities with which we share your data; information about the possibility of denying consent and its consequences; and the right to withdraw consent. To exercise these rights, contact us at tos@chatfuel.com.

Other Latin American jurisdictions

If you are a resident of Mexico, Argentina, Chile, Colombia, Peru, or another Latin American country with

applicable data protection legislation, you may have comparable rights to access, rectify, cancel or delete, or object to the processing of your personal data (the "ARCO" rights and their equivalents), as well as the right to withdraw consent. To exercise any of these rights, contact us at tos@chatfuel.com.

Changes to this Privacy Policy

We're constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Chatfuel website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Contact Information:

If you have any questions or comments about this Privacy Policy, how we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- tos@chatfuel.com
- www.chatfuel.com