



Brainsight Privacy Policy

Last updated: 2 October 2026

This Privacy Policy explains how Brainsight B.V. collects, uses and shares personal data as controller, and which rights you have. Capitalised terms not defined here have the meaning given in the Brainsight Terms & Conditions (the "Terms").

1. Who We Are

Brainsight B.V. ("Brainsight", "we", "us"), Johan Huizingalaan 763 A, 1066 VH Amsterdam, the Netherlands, is the controller for the personal data described in this Privacy Policy. Contact: support@brainsight.app.

2. Scope

2.1. This Privacy Policy applies to personal data we process about users of our platform, API and plugins, website visitors, prospects, business contacts, newsletter subscribers and job applicants (together, the "Services").

2.2. **Customer Content is out of scope.** Images, videos, URLs and other content uploaded to the Services by our customers may contain personal data, such as persons depicted in advertising. We process such content as processor on behalf of our customer, under our [Data Processing Addendum](#). If you appear in such content, please contact the customer that uploaded it; it is responsible for that processing.

2.3. **Derived Data is not personal data.** In providing the Services, we generate non-identifiable metrics and features from Customer Content ("Derived Data"), such as attention scores and compositional features. Derived Data does not relate to identifiable persons and is owned by Brainsight, as set out in the Terms.

2.4. The Services are intended exclusively for business users aged 16 or older. We do not knowingly collect personal data of children.

3. Personal Data We Collect

Information you provide to us:

- **Account information:** name, business e-mail address, company, role, password or login credentials (including via Google sign-in), workspace and team settings.
- **Payment information:** billing name, address, company details and VAT number. Payments are processed by our payment provider (Stripe). We do not store full payment card details.
- **Communications:** messages, support requests, feedback, call and video meeting content and, where announced, recordings of sales or support calls for training and quality purposes.
- **Events, surveys and campaigns:** information you provide when registering for webinars, events, trials, surveys or downloads.
- **Job applications:** CV, motivation and other information you provide when applying.

Information collected automatically:

- **Usage data:** log-ins, features used, number and type of analyses, API calls, timestamps, errors and settings.
- **Device and connection data:** IP address, browser, operating system, device identifiers, approximate location derived from IP address.
- **Cookies and similar technologies** on our website and platform, as described in section 11.

Information from other sources:

- **Your organisation:** if your employer provisions your account, it may provide your name and e-mail address.
- **Integrations:** if you use our Services through a third-party platform such as Figma, we receive account information you make available through that platform.
- **Business sources:** professional information about business contacts from public sources such as company websites and LinkedIn, and from B2B data providers, including identification of the company associated with an IP address that visits our website.

4. Purposes and Legal Bases

Purpose	Legal basis (Article 6 GDPR)
Creating and managing accounts, providing the Services, processing payments	Performance of contract
Customer support, onboarding and account management	Performance of contract; legitimate interest
Analysing usage to maintain, secure, improve and develop the Services and new products, including research and development	Legitimate interest in improving and innovating our products
Creating aggregated and de-identified data (section 5)	Legitimate interest
Security, fraud prevention, abuse detection, enforcing the Terms and Acceptable Use Policy	Legitimate interest; legal obligation
E-mail marketing, newsletters and product updates to customers and business contacts	Legitimate interest (customers and business contacts, with opt-out in every message); consent where required by law
Identifying companies visiting our website and contacting them for B2B sales	Legitimate interest; consent for non-essential cookies where required
Advertising and retargeting on third-party platforms (such as LinkedIn)	Consent
Recording calls for training and quality assurance	Legitimate interest, with prior notice; you may object at the start of the call
Recruitment	Pre-contractual steps; consent for longer retention
Compliance with tax, accounting and other legal obligations	Legal obligation
Establishing, exercising or defending legal claims, and corporate transactions	Legitimate interest

Where we rely on legitimate interest, we have balanced our interests against your rights. You may object at any time (section 10). We do not make decisions producing legal or similarly significant effects based solely on automated processing.

5. Aggregated and De-identified Data

We may create aggregated, anonymised or de-identified information from personal data and usage data, such as usage statistics, feature adoption, benchmarks and industry trends. Such information does not identify you and is not personal data. We may use, publish and share it for any purpose, including research, industry analysis, product development and marketing, and it remains our property.

6. Sharing Personal Data

We do not sell personal data. We share personal data only with:

- **Service providers** acting on our behalf, for hosting and infrastructure (Google Cloud), AI processing, payments (Stripe), CRM, e-mail and marketing automation, website analytics and B2B visitor identification, customer support and IT services. They may use personal data only to provide their services to us.
- **Your organisation:** if your account is part of an organisation's workspace, its administrators can see your account information and activity in that workspace.
- **Other users:** when you collaborate or share Output, other users can see your name and the content you share. Output you download or share outside the Services is your responsibility.
- **Third-party platforms** you choose to connect, such as Figma.
- **Professional advisors, authorities and courts**, where required by law or to protect our rights, property or safety, or those of others.
- **Acquirers and investors:** in connection with a merger, acquisition, financing, due diligence, reorganisation or sale of all or part of our business, personal data may be disclosed or transferred to the parties involved, subject to confidentiality.

7. International Transfers

We store personal data in the European Union. Some service providers process personal data outside the European Economic Area, including in the United States. In that case, we rely on an adequacy decision of the European Commission (including the EU-US Data

Privacy Framework for certified providers) or on the European Commission's Standard Contractual Clauses. You can request more information via support@brainsight.app.

8. Retention

Data	Retention period
Account and usage data	For as long as your account exists. Accounts inactive for 24 months may be deleted after notice, as set out in the Terms
Billing and invoicing data	7 years, as required by Dutch tax law
Marketing contacts and prospects	Until you unsubscribe or object, or 24 months after our last interaction
Support communications and call recordings	Up to 24 months
Job applications	4 weeks after the end of the procedure, or 1 year with your consent
Security and access logs	Up to 12 months, unless needed longer for an investigation

We may retain data longer where necessary to establish, exercise or defend legal claims. Aggregated and de-identified data (section 5) may be retained indefinitely.

9. Security

We take appropriate technical and organisational measures to protect personal data, including encryption in transit and at rest, access controls with multi-factor authentication and hosting on Google Cloud infrastructure in the EU, which maintains ISO 27001 and SOC 2 certifications. No system is completely secure. If a personal data breach is likely to result in a high risk to you, we will inform you as required by law.

10. Your Rights

Under the GDPR, you have the right to access, rectify and erase your personal data, to restrict or object to its processing, and to data portability. Where processing is based on consent, you may withdraw it at any time, without affecting earlier processing. You may object to direct marketing at any time, including via the unsubscribe link in every marketing e-mail.

To exercise your rights, contact support@brainsight.app. We will respond within one month and may ask you to verify your identity. If your account is managed by your organisation, we may refer certain requests to it. Some rights are subject to legal exceptions, for example where we must retain data by law.

You have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) or the supervisory authority in your country.

11. Cookies and Similar Technologies

We use cookies, pixels and similar technologies on our website and platform:

- **Necessary:** for log-in, security and core functionality. These do not require consent.
- **Analytics:** to understand how our website and Services are used. Where required, we ask for consent.
- **Marketing and B2B identification:** to measure campaigns, show relevant advertising on platforms such as LinkedIn, and identify companies visiting our website. We only use these with your consent.

You can manage your preferences via the cookie settings on our website and through your browser settings.

12. Changes and Contact

We may update this Privacy Policy. We will publish the updated version on our website and, for material changes, inform account holders by e-mail or in the Services. For questions, contact support@brainsight.app or Brainsight B.V., Johan Huizingalaan 763 A, 1066 VH Amsterdam, the Netherlands.