

sip.coach — Privacy Factsheet

Summary for rollout conversations with works councils, data protection officers, and IT security · As of: 29 September 2026

This factsheet summarizes what sip.coach already discloses publicly — in particular in the Privacy Policy (dated 15 July 2026) and in the GDPR overview page. It is **not a legal document** and does not replace the Privacy Policy or the Legal Notice; in case of any discrepancy, the Privacy Policy at sip.coach/en/privacy/ governs.

1 Where Data Is Processed

Hosting and server log files for this website run on our own infrastructure in Germany; server log data is not transferred to third-party providers outside the EU. Account data, training and conversation data, the RAG knowledge base, and the team dashboard are likewise stored in Germany / the EU. For account management and authentication we use a self-hosted instance of the Keycloak software: login credentials and identity information never leave our own infrastructure, which is operated within the EU.

Third-country exposure exists only where the Privacy Policy states it: for individual voice AI steps (speech-to-text and text-to-speech), some processed in the US; for payment processing via Stripe (which may involve transfers to group companies outside the EU); and for Google Analytics 4 — the latter only after consent. All third-country transfers are secured by a Data Processing Agreement (DPA) and EU Standard Contractual Clauses and/or certification under the EU-US Data Privacy Framework. The voice recording itself is processed in memory only, is never written to disk, and is discarded immediately after conversion; only the resulting transcript text is stored.

2 Data Processors (Roles)

Role	Provider	Safeguard
Hosting / server logs	Own infrastructure (Germany)	No third-country exposure
Account management / login	Self-hosted Keycloak instance (EU)	No third-country exposure
Payment processing	Stripe Payments Europe, Limited (Ireland)	DPA; may involve transfer to group companies outside the EU
Invoicing / accounting	ERP system Odoo	Statutory retention periods
Web analytics (consent-based only)	Google Analytics 4 (Google Ireland Limited)	EU-US DPF certification / EU Standard Contractual Clauses
Voice AI: speech-to-text	Data processor, some processing in the US*	DPA & EU Standard Contractual Clauses
Voice AI: text-to-speech	Data processor, some processing in the US*	DPA & EU Standard Contractual Clauses

* The Privacy Policy names these two roles without a company name. Agreements under Art. 28 GDPR are in place with all processors listed above, ensuring a level of protection consistent with the GDPR.

3 Retention Periods

- General rule: personal data is processed and retained only for as long as necessary for the respective purpose.
- Invoices and accounting records: up to ten years (§ 147 AO, § 257 HGB — German tax and commercial law).
- E-mail inquiries (e.g. to hello@sip.coach): deleted once the inquiry has been resolved, provided no statutory retention obligation applies.
- Account, training, and conversation data in the app: exportable (Art. 15) and erasable (Art. 17) by the user at any time, including anonymization of billing data in the ERP back-end.
- Raw audio recordings from live sparring: never stored — discarded immediately after conversion to text.

4 What a Manager Sees — and Does Not See

The team dashboard is deliberately built for aggregated reporting rather than individual monitoring. Managers see aggregated team metrics: score trends and the team's weakest dimensions or skill gaps. Individual training sessions and literal conversation content remain private by default; there is no individual monitoring and no hidden performance surveillance. sip.coach was built with works council co-determination requirements (German § 87 (1) no. 6 BetrVG) in mind.

5 Operator Access

Within the company, access to personal data is granted only to those units that need it to fulfill contractual and legal obligations. Login credentials and identity information reside exclusively in the self-hosted, EU-based Keycloak instance. External data processors (see section 2) each receive only the data required for their specific service.

6 Deterministic Aggregation

AI evaluates each of the five scoring dimensions using a self-consistency procedure (three scoring runs, median, disclosed scoring spread); the overall score is then aggregated deterministically and server-side — not through unconstrained LLM judgment. That keeps every value auditable for works councils and compliance teams. Solely automated decision-making with legal effect within the meaning of Art. 22 GDPR does not take place: scoring serves personal development. Transcripts and uploaded documents are also never used to train AI models.

7 Objection and Deletion Paths

- Data subject rights under GDPR: access (Art. 15), rectification (Art. 16), erasure (Art. 17), restriction of processing (Art. 18), data portability (Art. 20), right to object to processing based on Art. 6(1)(f) (Art. 21), and the right to withdraw consent with future effect (Art. 7(3)).
- How to exercise these rights: an informal message to hello@sip.coach. App users can also access data export and account deletion directly in their account settings.
- Google Analytics consent: withdrawable at any time with future effect via the cookie settings.
- Microphone access in live sparring: consent can be withdrawn in the browser at any time; without it, text input remains fully available.
- Right to lodge a complaint with the supervisory authority: Die Sächsische Datenschutz- und Transparenzbeauftragte (Saxon State Commissioner for Data Protection), Devrientstraße 1, 01067 Dresden, Germany, phone +49 351 85471-101, e-mail saechsdsb@slt.sachsen.de.

This factsheet is a summary for informational purposes and does not create any commitment beyond the Privacy Policy. Only the Privacy Policy (sip.coach/en/privacy/, dated 15 July 2026) and the Legal Notice (sip.coach/en/imprint/) are legally binding.

8 Contact

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