

PRIVACY POLICY

SoftSkills Rewired, LLC

Last Updated: [DATE]

1. Introduction

SoftSkills Rewired, LLC operates the CultureGuard platform. This policy explains how we collect, use, and safeguard information. CultureGuard is designed to help organizations improve workplace culture, not to monitor individual employees.

2. Our Role

- **For Business Customers:** We act as a **Data Processor**. The Customer (Employer) is the Data Controller.
- **For Website Visitors:** We act as a **Data Controller**.

3. Information We Collect

3.1 Workplace Metadata (Processed for Customers)

- **Microsoft 365:** Email timestamps, recipient counts, calendar duration, meeting counts
- **Jira/Project Tools:** Issue creation/completion timestamps, assignment patterns
- **WE DO NOT COLLECT:** Content of emails/chats, subject lines, files, browsing history, location data, or biometrics

3.2 Account Information

Name, email, company name, job title, and encrypted password.

4. How We Use Information

We process workplace metadata to calculate aggregate work patterns, detect burnout risk, generate team health scores, and facilitate coaching. We use Account Information to manage access and provide support.

5. Data Retention

- **Raw Metadata:** Deleted within 48 hours
- **Aggregated Signals:** Retained for 24 months or contract term
- **Intervention Records:** Retained 36 months for audit purposes

6. Sharing Information

We do NOT sell personal data. We share data only with authorized Customer personnel (HR/Managers) and necessary Service Providers (Azure, SendGrid, Supabase).

7. Security

We use TLS 1.2+ encryption for transit, AES-256 for storage, multi-factor authentication, and SOC 2 compliant infrastructure (Azure).

8. Your Privacy Rights

- **Employees of Customers:** Contact your employer (Data Controller) to access, correct, or delete your data
- **California Residents (CCPA):** Right to know, delete, and opt-out of sale (we do not sell data)
- **European Residents (GDPR):** Right of access, rectification, erasure, and to object to processing

9. EU AI Act Compliance

CultureGuard does **not** use emotion recognition or biometric processing. All pattern detections are reviewed by humans before action, ensuring transparency and oversight.

10. Contact Us

Email: privacy@softskillsrewired.com

DPO Contact: dpo@softskillsrewired.com

Address: SoftSkills Rewired, LLC