

**Last updated:** [insert date]

This Privacy Policy explains how we collect, use, store and protect personal data when you interact with our WhatsApp-based AI agent (“the AI Agent”).

We are committed to protecting your privacy and handling your data transparently and securely, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

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## 1. Who We Are

**Data Controller:**

Kilwinning Rangers

Buffs Park, Pennyburn Road, Kilwinning, KA13 6LF

Buffs.media@gmail.com

If you have any questions about this policy or how your data is handled, you can contact us using the details above.

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## 2. What the WhatsApp AI Agent Does

Our AI Agent interacts with users via WhatsApp to provide automated responses, information, and support. Conversations are processed using artificial intelligence to generate replies.

The AI Agent is not intended to provide legal, medical, or financial advice.

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## 3. What Data We Collect

When you interact with the AI Agent, we may collect and process the following personal data:

- Your **WhatsApp phone number**
- **Message content** you send to the AI Agent
- **Metadata** related to messages (such as timestamps)
- Any **personal information you choose to include** in your messages

We do not intentionally collect special category data (such as health, political opinions, or religious beliefs). Please do not share sensitive personal data unless strictly necessary.

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## 4. How We Use Your Data

We use your data to:

- Respond to your messages and provide the AI Agent service
- Improve the accuracy, quality, and performance of the AI Agent
- Monitor usage for security, troubleshooting, and misuse prevention
- Comply with legal and regulatory obligations

We do **not** use your data for automated decision-making that produces legal or similarly significant effects.

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## 5. Lawful Basis for Processing

Under UK GDPR, our lawful bases for processing your personal data are:

- **Consent** – by messaging the AI Agent, you consent to your messages being processed
- **Legitimate interests** – to operate, maintain, and improve the AI Agent
- **Legal obligation** – where we are required to retain or disclose data by law

You may withdraw your consent at any time by stopping use of the AI Agent.

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## 6. Data Sharing and Third Parties

Your data may be shared with:

- **WhatsApp / Meta Platforms Inc.** as part of message delivery and platform operation
- **AI service providers** used to generate responses
- **Technical service providers** (e.g. hosting or analytics), where necessary

All third parties are required to handle data securely and in accordance with data protection laws.

We do **not** sell your personal data.

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## 7. International Transfers

Some of our service providers may process data outside the UK. Where this occurs, we ensure appropriate safeguards are in place, such as:

- Adequacy regulations
- Standard contractual clauses

- Equivalent data protection measures
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## 8. Data Retention

We retain personal data only for as long as necessary to:

- Provide the AI Agent service
- Improve system performance
- Meet legal, regulatory, or security requirements

Conversation data may be anonymised or deleted after a defined retention period.

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## 9. Your Rights

Under UK GDPR, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request deletion of your data
- Restrict or object to processing
- Withdraw consent at any time
- Lodge a complaint with the Information Commissioner's Office (ICO)

To exercise your rights, contact us using the details in section 1.

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## 10. Security

We implement appropriate technical and organisational measures to protect your data, including access controls, encryption, and monitoring.

However, no system is completely secure, and you use the AI Agent at your own risk.

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## 11. Children's Data

The AI Agent is not intended for use by children under 13. We do not knowingly collect data from children.

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## **12. Changes to This Policy**

We may update this Privacy Policy from time to time. Any changes will be communicated by updating the “Last updated” date above.