

THE CHANGE REPUBLIC

Privacy Policy

Last updated: 17th February 2026

1. Who we are

The Change Republic GmbH (CHE-131.869.164), Rötibodenstrasse 34, 8820 Wädenswil, Switzerland ("we", "our") is the data controller for all processing described in this notice. We offer executive coaching, personal branding and training services, and we also operate an AI coaching tool – CoachTünde.ai – powered by Chatbase. We take the protection of your personal data seriously and comply with the Swiss Federal Act on Data Protection (FADP) and other applicable laws.

2. Which law applies

This notice is based on the Swiss FADP. Where we use service providers or transfer data abroad, we ensure that the protections required by Swiss law (e.g., adequacy decisions or standard contractual clauses) are in place. Some of our providers, including Chatbase, are also certified under the EU General Data Protection Regulation (GDPR) and SOC 2 Type II.

3. What data we collect

We do not run analytics (e.g., Google Analytics) and do not share data with advertising networks.

Category	Examples	Source
Contact details	name, email, phone, postal address	you / your employer
Coaching data	goals, session notes, assessments	you during sessions
Payment data	invoice amount, payment status, last-4 digits of card/PayPal ID	Stripe, PayPal
Newsletter data	name, email, subscription status	WordPress + Kajabi sign-up form
Technical data (essential cookies)	device & session ID, security/load-balancing cookies set by WordPress core and essential plugins	your browser
Chatbot conversation data (AI bot only)	text you enter into the chatbot, metadata such as timestamp and session ID	you via your AI bot
Voice agent data (AI Voice Assistant – ElevenLabs)	audio recordings of your voice, automatically generated transcripts, timestamps, session ID, call duration, IP address, browser and device information	you via voice interaction

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4. Why we use your data

- We process your data only for clear purposes and on a lawful basis under the FADP:
- Provide and manage coaching, training, speaking and digital products. We use your contact details and coaching data to schedule sessions, deliver services and follow up on outcomes.
- Invoice and receive payments. Payment data is used to issue invoices and process payments.
- Send newsletters you have subscribed to. You can unsubscribe at any time.
- AI coach. When you use CoachTünde.ai, the questions you type are processed so that the chatbot can generate responses. Conversation logs are also used to improve the performance of the chatbot. Chatbase acts as our data processor for this purpose (see section 8 below).
- Use of AI Voice Agent (ElevenLabs). When you use our AI voice assistant, your voice recordings and transcripts are processed to: generate real-time audio responses, maintain conversation context, improve service quality and performance, ensure security and prevent misuse. The legal basis for this processing is: your consent (Art. 31 FADP), which you provide by actively initiating a voice conversation and our legitimate interest in providing innovative digital services and improving user experience. Voice transcripts may be used in anonymised form for service improvement.
- Service improvement. To improve service quality and fairness, we analyse anonymised prompts in AI systems such as ChatGPT, Claude and Perplexity or transcripts in Chatbase or Elevenlabs. We never share identifiable data when doing so.
- Compliance and legal defence. We retain certain data to comply with accounting and tax obligations and to defend against potential legal claims.

5. Legal basis under the FADP

- The legal bases for our processing under the FADP are:
- Contract fulfilment – delivering the services you request.
- Consent – for sending newsletters, recording sessions, and using the AI coach (by starting a conversation with CoachTünde.ai you consent to the processing described here).
- Legitimate interests – improving our services and ensuring IT and AI security.

6. How long we keep data

<i>Data set</i>	<i>Retention period</i>
Coaching / client files	2 years after the engagement ends
Payment & accounting records	10 years (Swiss law)
Newsletter list	until you unsubscribe
Session recordings (if any)	deleted after note-taking or within 365 days
Chatbot conversation data	up to 365 days in Chatbase unless required longer for troubleshooting or legal defence
Voice agent data (ElevenLabs)	Voice recordings and conversation transcripts are retained for up to 365 days from the date of interaction. After this period, data is automatically deleted or anonymised unless a longer retention period is required for legal defence, security investigations, or compliance with legal obligations.

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7. Who receives your data

We use trusted service providers under confidentiality agreements to help us run our business. These include Zoom and WhatsApp (communication), Google Drive (document storage), Stripe and PayPal (payments), Kajabi (email marketing), ChatGPT, Claude and Perplexity (research), Tactiq (AI note-taker), and Chatbase (chatbot hosting). Data used with ChatGPT/Claude/Perplexity is anonymised before processing, and only chatbot conversation data is processed by Chatbase. Other business activities (human coaching, training, events and newsletters) do not use Chatbase.

8. Additional information about Chatbase (CoachTünde.ai)

CoachTünde.ai is hosted on Chatbase, a platform that builds and operates AI chatbots. Chatbase acts as a data processor on our behalf and processes only the text and metadata that you provide to the AI coach.

- Purpose and scope of processing. Chatbase uses the conversation content and technical metadata (such as timestamps and session IDs) to generate responses and to improve the chatbot's performance. Chatbase does not access our payment or newsletter data.
- Compliance certifications. According to Chatbase's Trust Center, the company has achieved GDPR and SOC 2 Type II compliance trust.chatbase.co. Their portal explains that the platform offers detailed compliance documentation and is designed to build confidence in its data-protection capabilities. See for more information <https://www.chatbase.co/security> and <https://www.chatbase.co/legal/privacy>.
- Security measures. Chatbase implements industry-standard safeguards. Its infrastructure controls include log management, unique account authentication and restricted production application access. Product security measures include encryption of data and periodic security self-assessments. Organisational security measures such as performance evaluations and mobile-device-management systems are in place, and internal procedures include cybersecurity insurance and board-level oversight.

9. Additional information about ElevenLabs (Voice Agent Provider)

Our AI voice agent is powered by ElevenLabs Inc., which acts as a data processor on our behalf.

Voice recordings and transcripts may be processed and stored in the United States and other jurisdictions where ElevenLabs and its subprocessors operate.

Data transfers outside Switzerland and the EU are safeguarded through:

- Standard Contractual Clauses approved by the European Commission and recognised under Swiss law
- Participation in the Swiss-U.S. Data Privacy Framework (where applicable)
- Additional technical and organisational security measures

ElevenLabs maintains industry-standard security certifications, including SOC 2 Type II.

You can find more information in ElevenLabs' [Terms of Service EEA](#), [Privacy Policy](#), and [Data Processing Addendum](#).

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10. International transfers

Some of our service providers store data outside Switzerland or the EU (for example, Kajabi – USA; Stripe – USA/EU; PayPal – USA/EU; Chatbase – USA; ElevenLabs - USA). When transferring data across borders, we rely on the Swiss Federal Council's adequacy decisions or on Standard Contractual Clauses approved by the Federal Council. These mechanisms ensure that your data receives a level of protection equivalent to Swiss law.

11. Security

We and our service providers use technical and organisational measures to protect your data, including HTTPS encryption, role-based access controls and, where available, two-factor authentication. Internally, access to your data is limited to personnel who need it to perform their duties. Chatbase implements additional controls such as log management, unique account authentication, data encryption and regular security assessments. We review our security measures regularly to maintain confidentiality, integrity and availability of your data.

12. Your rights

Under the FADP you have the right to request access, correction, deletion or restriction of your personal data. If processing is based on consent, you may withdraw that consent at any time, though this will not affect the lawfulness of processing carried out before withdrawal. You also have the right to lodge a complaint with the Swiss Federal Data Protection and Information Commissioner.

With regard to voice agent data, you may:

- Request access to your voice recordings and transcripts
- Request correction or deletion of your recordings
- Withdraw your consent to voice processing at any time
- Request restriction of processing

Requests will be answered within 30 days unless a disproportionate effort exception applies.

13. How to contact us

For any privacy enquiries or to exercise your rights, please submit a request [via our contact form here](#).

12. Changes to this notice

We may update this Privacy Policy from time to time. The latest version is always posted [on the legal section of our website](#). Material changes will be communicated through our usual channels (e.g., LinkedIn Company page, website banners or email newsletters).