

Privacy Policy of the "The Butler AI" Chatbot

«The Butler AI»

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General Provisions

The Controller of personal data processed by the "The Butler AI" Chatbot (hereinafter – the **Chatbot**) is its Developer – a private individual. This Privacy Policy has been developed in accordance with the requirements of the Law of Ukraine "On Personal Data Protection" dated June 1, 2010, No. 2297-VI, and other normative legal acts of Ukraine regulating the collection, processing, and protection of personal data.

We adhere to the best practices for personal data protection and fully comply with the requirements of the General Data Protection Regulation (GDPR), particularly regarding the principles of transparency, data encryption during transmission and storage (see section **"Data Storage and Protection"**), and ensuring the full rights of data subjects, including the right to erasure (detailed in the section **"User Rights"**).

We treat the confidential information of all Chatbot users with great respect and strive to protect the confidentiality of their personal data (i.e., information or a set of information about a natural person who is identified or can be identified). **Use of the Chatbot signifies the user's consent to this Privacy Policy and the terms of processing their personal data.** If you do not agree with these terms, please stop using the Chatbot. Note that we do not verify the authenticity of the personal data provided by the user and expect you to report current and truthful information.

This Policy defines our obligations regarding the non-disclosure and protection of personal data that the user provides while using the Chatbot (e.g., when sending queries or messages to the bot). The Developer takes all necessary measures to maintain the confidentiality of such data in accordance with generally accepted standards of technological and operational security.

What Personal Data is Collected

When using the "The Butler AI" Chatbot, we may collect and process the following categories of user **personal data**:

- **Telegram Identification Data:** A unique user ID in Telegram, profile name and/or nickname (username) provided by the Telegram API. *For example: @ivanivanov, Ivan Ivanov* (first and last name, if specified in the profile).
- **Data Provided in Messages:** The content of messages, queries, and commands that you send to the Chatbot. This may include any information you choose to

communicate to the bot in text form or by sending files.

For example: questions to the bot, a description of your situation or task, photos or documents you provided, etc. Please note that such messages may contain personal information of your choosing. We **do not recommend** sending confidential or overly sensitive information (e.g., health data, financial details, passwords) to the Chatbot without an urgent need.

- **Technical and Automatically Received Data:** Basic information about interaction with the Chatbot. Specifically, the *time and date* of your requests to the bot, the *list of sent messages*, as well as technical data automatically transmitted by Telegram. Such data includes: Telegram interface language, device type or operating system (if available), and other message metadata (e.g., the fact of sending an image or document, without analyzing their content).

Personal data is collected **only to the extent necessary for the Chatbot's operation and the achievement of the processing purposes defined below**. We do not collect any information outside the Telegram platform – the Chatbot does not have access to your device, contacts, or other data, other than what you send in messages. Also, the Chatbot does not use cookies or other trackers, as it operates within the messenger.

Purpose of Personal Data Processing

We process the collected user personal data **exclusively for defined purposes**, namely:

- **Providing the Chatbot Service:** Using your data for the proper operation of the bot and the execution of its basic functions – that is, for processing your queries and providing the answers or services you request. For example, the Chatbot analyzes the content of your message to formulate a relevant response.
- **Personalization and Improvement of Interaction:** The Chatbot may take into account your interface language or previous requests to make communication more convenient and tailored to your needs.
- **Improving Service Quality (Analytics):** Based on anonymized or aggregated data about the Chatbot's use, we can draw conclusions about which functions users need, which questions arise most often, and refine the response algorithms. For example, analyzing the total number of queries per day or the most popular topics helps us optimize the bot's operation. *However, we do not use personal data in a way that allows us to identify you for analytical purposes.*
- **Communication with the User (Support):** If you contact us through feedback channels (email or other contact) with a request regarding the Chatbot's operation or the exercise of your rights, we will use the contact and other data you provided to respond to the request, resolve the issue, or fulfill your application.

We **do not process personal data for incompatible purposes**, such as third-party marketing, profiling for automated decision-making that may have legal consequences for you, etc., without your separate consent. Processing is carried out on lawful grounds, specifically: for the performance of a contract (providing Chatbot services at your request), with your consent (which you provide by starting to use the bot), and in accordance with the Developer's legitimate interests to ensure the operation and security of the service.

Data Storage and Protection

Maintaining the confidentiality of your personal data is a priority for us. We store personal data in an electronic database protected from unauthorized access. Appropriate technical and organizational security measures have been taken to prevent loss, unlawful processing, or unauthorized access to data. Specifically:

- Data you transmit through the Chatbot is **encrypted during transmission** by means of the Telegram messenger and our servers. We use secure communication protocols (HTTPS/TLS) for interaction with the Telegram API and external services to ensure the integrity and confidentiality of your messages during transit.
- The **Data Storage** (the server or cloud infrastructure where the Chatbot is hosted) is located in a secure data center with restricted access. Access to personal data is restricted only to us (the Developer) and authorized persons who need it to support the Chatbot's operation. All access is protected by passwords and, where possible, additional authentication.
- We have implemented **generally accepted standards of information security** and operational procedures to protect data. This includes regular software updates, the use of firewalls, anti-virus protection, data backup, and monitoring of systems for vulnerabilities or unauthorized activity.
- **Confidentiality as an operating principle:** We do not disclose or publish users' personal data. The "need-to-know" rule applies internally: any data processing is carried out only to the extent necessary to achieve the stated goals. Persons who may gain access to your data (e.g., for technical support) are obliged to comply with the confidentiality regime in accordance with this Policy and the law.

Despite all measures, **it is important to understand that no method of data transmission over the Internet or electronic storage is 100% secure.** We are constantly improving the security system but cannot guarantee absolute data security. In the event of a breach of personal data security (e.g., unauthorized access), we will immediately notify you of the incident in cases provided for by law and take necessary measures to minimize possible negative consequences.

Transfer of Data to Third Parties

We do not sell or transfer your personal data to third parties, except in the cases described below. **Third parties** in the context of this Policy may include our service providers or partners involved in the Chatbot's functioning, as well as state authorities within the scope of their powers. Data transfer to third parties occurs only when there are lawful grounds and appropriate safeguards.

1. Use of External Services (Data Processors). To provide the Chatbot's core function – generating intelligent responses to your queries – we engage the artificial intelligence API, **Google Gemini**. This means that the content of your messages (the query text) may be transmitted to the servers of Google (Google LLC or its affiliated entities) for processing and forming a response. The transfer is carried out via a secure encrypted communication channel, and the data is used **solely for the purpose of receiving a response to your**

query. Google acts as a processor that processes data on our behalf. According to Google's public assurances, the **Gemini API service does not use received prompts (your questions) or responses to train its models** or for other independent purposes without your separate consent. Data sent to Google is encrypted in transit and stored using standard Google Cloud protection mechanisms. We transmit only the minimum necessary information to the external service to fulfill your request (usually the text of the query itself).

Please note: by using the Chatbot, you understand and agree that the content of your messages may be processed by Google's infrastructure. While we take measures to protect your data, Google, as an independent large company, has its own privacy policies and may process information in data centers outside of Ukraine. However, Google undertakes to comply with security and confidentiality requirements regarding this data in accordance with its cloud service terms and the additional data processing agreement (Cloud Data Processing Addendum).

2. Other Third-Party Service Providers. Currently, the Developer does not engage other third parties in the processing of Chatbot user personal data. Should the need arise in the future to connect other services (e.g., for analytics, hosting, support, etc.), we will ensure that such providers comply with confidentiality requirements and use the data only under our instructions and for the purposes we define. In any case, we will update this Policy and inform you of such changes.

3. Cases Provided for by Law. We may disclose your personal data to third parties without your consent if required by the legislation of Ukraine. Specifically, upon a lawful request from law enforcement agencies, the court, or other authorized state bodies – within their competence and in accordance with the procedure established by law. Such disclosure will be carried out only if there are proper legal grounds and documents (e.g., a court decision).

4. Protection of Rights and Interests. The Developer may transfer the minimally necessary data to third parties (e.g., legal consultants or law enforcement agencies) in cases where it is needed to protect our legitimate rights, investigate possible violations of the Chatbot's terms of use or security, and to protect the rights, property, or safety of other persons.

Beyond the described cases, **no user personal data is disclosed or transferred to third parties.** We also do not perform international transfers of personal data, as our activity is primarily focused on the territory of Ukraine. If the need arises in the future to transfer data outside of Ukraine (e.g., by engaging a new cloud service), we will ensure compliance with all legal requirements for such transfer and an adequate level of data protection, and we will obtain user consent if necessary.

Data Retention Period and Deletion

Personal data is stored no longer than is necessary for the purpose for which it was collected. We adhere to the principle of storage minimization: actively used data is stored for the period necessary to service you through the Chatbot, and then either deleted or anonymized.

Key criteria for determining the retention period:

- **Duration of Chatbot Use.** While you are actively using the bot, we may store the history of your queries and responses to ensure dialogue context (if provided by the functionality) and improve the quality of interaction. If the Chatbot does not require historical data for functioning (e.g., operates in a single-query mode), messages may not be stored longer than the session of query processing lasts.
- **Your Instructions or Deletion Requests.** You have the right to contact us at any time with a demand to delete your personal data (see section **User Rights** for details). We will fulfill such a request (delete or anonymize your data) as quickly as possible if further storage is not required for lawful purposes (e.g., compliance with a legal obligation).
- **Need for Security and Lawfulness.** We may store certain data for a longer period if required to investigate cases of unauthorized use of the Chatbot, to protect against attacks, or in the event of a legal dispute. For example, server logs containing Telegram server IP addresses and access times may be stored for several months for information security purposes. Such information will not be used for other purposes and will be deleted when the need for it expires.

In general, if you stop using the Chatbot and have not made a separate data deletion request, your personal data (including message history) will not be stored indefinitely. We periodically check the relevance of data. If we find that the data is not needed (e.g., you have not used the bot for more than 6 months, and there are no legal grounds to continue storing it), we may independently delete or anonymize such data.

Data deletion is carried out by irrevocably erasing records from our active databases. In the case of backups, this data will be deleted during the nearest backup update cycle (usually within 30-60 days). After deletion, your personal data is not subject to recovery, except from sources outside our control (e.g., if you independently distributed content from the Chatbot).

In specific cases provided for by law, we may store certain information longer than the established period. For example, legislation may require storing user requests or other data for a minimum specified period. In such cases, the data is stored only for the fulfillment of the relevant obligations and will be deleted after their expiry.

User Rights (Data Subject)

Every user, as a data subject, has legally guaranteed rights regarding their personal data. We respect these rights and ensure the possibility of their realization. Your main rights in the field of personal data protection are as follows:

- **Right to Be Informed.** You have the right to know what personal data about you is collected, from what sources, for what purpose it is processed, and who is the owner (controller) of this data. This Policy provides the relevant information. You can also ask us about the location or contact details of the owner (Developer) and the data processor.
- **Right to Access Your Personal Data.** You may send us a request – whether your personal data is being processed, and if so, to receive a copy of your personal data

stored by us. We will provide a response and the necessary information no later than within 30 calendar days from the date of receipt of your request, as required by law.

- **Right to Rectification (Correction) of Data.** If you discover that your data is inaccurate, incomplete, or outdated, you have the right to demand its change or correction. For example, you can update your contact email if it has changed or correct your name. We will promptly make the necessary corrections upon your request.
- **Right to Withdraw Consent and Object to Processing.** In cases where processing is carried out based on your consent, you have the right to **withdraw your consent** at any time. This will not affect the legality of processing carried out before withdrawal, but it may mean that we will no longer be able to provide you with the Chatbot services (as certain data is necessary for its operation). Similarly, you have the right to submit a *motivated demand* with an **objection to the processing** of your personal data – if you believe that we do not have legal grounds or a legitimate interest for such processing. In case of receiving a substantiated objection, we will cease processing, except when there are compelling legitimate grounds for continuation that override your interests, or if required by law.
- **Right to Erasure ("Right to Be Forgotten").** You may demand the **destruction (deletion) of your personal data** in our systems. This right applies, in particular, when the data is no longer needed for the purposes for which it was collected, or if you have withdrawn consent and there is no other legal basis for processing, or if the processing is illegal. We will fulfill such a requirement (in the absence of exceptions provided for by law) within the defined terms and notify you of the fact of deletion.
- **Right to Restriction of Processing.** In certain cases (e.g., you challenge the accuracy of the data or the legality of its processing), you have the right to demand the temporary suspension of your data processing (other than storage) – until the issue is resolved. We will refrain from further processing within the specified limits and notify you before resuming processing.
- **Right to Protection from Automated Decision-Making.** The Chatbot **does not make decisions that have legal or similar significant consequences for the user based solely on automated processing.** All bot responses are informational and do not create legally significant obligations or consequences for you. You have the right not to be subject to a decision based solely on automated processing that significantly affects you. In the context of our service, this right is primarily ensured by the fact that such decisions are not made.
- **Right to Know the Mechanism of Automated Processing.** You have the right to request information about the logic by which the Chatbot operates within the framework of automated personal data processing. We can explain the general principles of the algorithm's operation (for example, that responses are generated by the Google Gemini language model based on your entered query and a large volume of training data, without direct human instruction for each case).
- **Right to Seek Protection of Your Rights.** If you believe that your personal data protection rights have been violated, you may contact us with a complaint or question (contacts are provided below). We will try to resolve any disputes peacefully. In addition, you have the right to file a complaint with the **Commissioner for Human Rights of the Verkhovna Rada of Ukraine (Ombudsman)** or to the court [zakon.rada.gov.ua]. The Ombudsman supervises compliance with personal data protection legislation in Ukraine. The submission of an appeal to the Ombudsman is

carried out in accordance with Art. 8 of the Law "On Personal Data Protection" and the Law of Ukraine "On Citizens' Appeals." You can send an appeal by mail or email to the Ombudsman's Office; the appeal should describe the essence of the violation of your rights and provide the necessary contact data.

Procedure for Exercising Rights: To exercise any of your rights, please contact us using the contact details provided at the end of this Policy. The Developer will provide a response or perform the necessary actions regarding your request **within 30 calendar days** from the date of receipt of the appeal, unless a different period is provided for by law. This period may be extended for another 30 days in the case of complex requests (e.g., a large volume of data), about which we will additionally inform you. Providing information and fulfilling requests is done *free of charge* (unless the requests are clearly unfounded or excessive). To protect your data, we may need to verify your identity (e.g., confirm that the appeal came from the owner of the Telegram account in question).

Changes to the Policy

The current version of the Privacy Policy is published with the date indicated at the beginning of the document. The Developer reserves the right to **make changes to this Policy** from time to time unilaterally. Reasons for changes may include: updating the Chatbot's functions, changes in legislation, implementing new data processing technologies, or feedback from users.

In the event of significant changes, we will inform users about the new version. The updated Policy may be posted directly in the Chatbot interface (e.g., through an informational message or link) and/or on the web page dedicated to the Chatbot. **The new version comes into effect from the moment of its publication, unless otherwise provided by the update itself.** The previous version is considered to have lost effect from the moment the new one comes into force.

We strive to ensure transparency and may inform you in advance about future changes. Specifically, in case of a substantial revision of the rules, you may receive a notification through the Chatbot or by other available means **at least 30 days** before the changes take effect. Continued use of the Chatbot after the updated Policy takes effect will mean your consent to its new terms. If you do not agree with the changes, you must stop using the Chatbot and may request the deletion of your personal data if desired.

We recommend periodically reviewing the Privacy Policy to familiarize yourself with current information about our data protection practices.

Contact Details

The Developer of the "The Butler AI" Chatbot (personal data controller) is a private individual. If you have any questions, complaints, or requirements concerning your personal data or the provisions of this Policy, you can contact the Developer using the following contact details:

- **Email:** developer@thebutlerteam.org (email for personal data inquiries)

Please include sufficient information in your appeal to identify you as a user (e.g., your Telegram ID or nickname) and the nature of the issue. We will make every effort to provide a response or resolve your issue as quickly as possible, but in any case, no later than the terms established by law.

Developer Liability Limitation

The "The Butler AI" Chatbot is provided on an "as is" basis. The Developer strives to ensure the correct and uninterrupted operation of the service but does not guarantee that the Chatbot's functioning will be completely error-free or will satisfy all user expectations. The responses provided by the Chatbot are generated by an automated system (artificial intelligence) and may, in some cases, contain inaccuracies or factual errors. **The user independently makes decisions based on the information received from the bot and understands that the use of advice or data provided by the bot is at their own risk.**

The Developer **is not liable for any losses or damages** incurred by the user or third parties as a result of the use or inability to use the Chatbot, its functionality, or the responses received through it, **to the maximum extent permitted by law.** In particular, the Developer is not responsible for direct or indirect losses (including loss of profit, data, business reputation, etc.) caused by the use of the Chatbot, even if the user was warned about the possibility of such losses.

The Developer also **is not responsible for misunderstandings or incorrect interpretation by the user of the provisions of this Privacy Policy** or other instructions regarding the use of the Chatbot. The user is obliged to carefully read the terms and, if necessary, ask clarifying questions before starting to use the service.

Disclaimer for Third-Party Actions: Although we implement all necessary measures to protect personal data, the Developer does not control and is not responsible for the security of platforms and third-party services involved in the Chatbot's operation (such as the Telegram messenger or the Google Gemini API), as well as for possible illegal actions of third parties (malicious actors). For example, the Developer is not responsible for the confidentiality of information on the side of Telegram or Google, as these companies independently determine the purposes and methods of data processing within the provision of their infrastructure services. We, for our part, trust the assurances of these parties regarding their adherence to an appropriate level of data protection, but **cannot guarantee** that their policies or practices will be flawless. The user should also familiarize themselves with the privacy policy of Telegram and the terms of use of the Google API for a full understanding of how these third-party services process information.

The Developer is not responsible for cases where the user independently made their personal data publicly available. If you decide to publish or transfer any information about yourself to third parties (for example, within the bot chat you provided personal data to other users or disclosed bot responses with your data), the responsibility for the consequences of such publication lies with you. We urge you to be cautious about disclosing your data.

In any case, **the Developer bears responsibility within the limits established by the current legislation of Ukraine.** Nothing in this Policy is aimed at limiting consumer rights or

excluding liability that cannot be excluded by law. If any part of these terms is deemed invalid or inconsistent with the law, it does not affect the validity of the other provisions of this Policy. Our lack of reaction to any violation by the user does not mean a waiver of the right to react to it in the future.