

CourseLaunchr Privacy Policy

Last updated: 31 August 2026

This Privacy Policy explains how **Sprk Studios**, trading as **CourseLaunchr** ("we", "us"), collects, uses, shares, and secures personal data when you:

- visit any CourseLaunchr website or FunnelOS sub-domain;
- purchase or use the AI FunnelOS Done-With-You or Done-For-You programs; or
- interact with our content, emails, Slack space, or other channels.

It also sets out your choices and rights under the EU General Data Protection Regulation ("GDPR").

1. Who is the data controller?

Sprk Studios, trading as **CourseLaunchr**
KVK 86304526 | BTW NL004223565B57
privacy@courselaunchr.com

We are established in the Netherlands and fall under the supervision of the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). "CourseLaunchr" is a trade name (*handelsnaam*) of Sprk Studios; **Sprk Studios is the legal entity and data controller** responsible for all processing described in this policy.

2. What data do we collect?

Category	Examples	Source
Account Data	Name, email, billing address, company name, VAT number, Stripe customer ID	You
Program Content	Funnels, lead magnets, emails, LinkedIn posts you upload or draft inside FunnelOS	You
Funnel Performance Data	Page views, opt-in rates, email opens/clicks, call-booking stats, A/B-test results	Generated through your use of the Software
Communications	Slack/DM messages, Loom videos, support tickets, call recordings	You
Technical Data	IP address, device/browser type, referrer URL, cookies, log files	Automatic
Marketing Preferences	Newsletter opt-ins, CTA clicks, unsubscribe events	You / automatic

3. Why and on what legal basis do we process data?

Purpose	Legal Basis (GDPR)
Provide and administer the Program, Software, and support	Contract (Art. 6(1)(b))
Take payment, invoice, and handle accounting	Legal obligation & contract (Art. 6(1)(c)(b))
Capture Funnel Performance Data to train and improve our in-house AI models (e.g., FunnelGPT suggestions, benchmark reports)	Legitimate interest (Art. 6(1)(f)) — we aggregate/pseudonymise where possible; you may object at any time (see § 9)
Send product or feature updates	Legitimate interest — you can opt out
Send marketing emails and case-study requests	Consent (Art. 6(1)(a))
Detect fraud, defend legal claims, enforce our terms	Legitimate interest
Comply with tax, bookkeeping, and regulatory duties	Legal obligation

About AI-model training

We store Funnel Performance Data (e.g., conversion metrics, email subject-line effectiveness, CTA click-through rates) inside a secure analytics warehouse. The data is never sold and is used only:

- to refine and benchmark the FunnelOS recommendation engine;
- to generate anonymised performance insights for you and other clients.

Whenever feasible we remove direct identifiers (name, email, company) before data enters the training pipeline. You can opt out of this processing at any time (see § 9).

4. With whom do we share data?

Recipient	Reason	Safeguard
Cloud hosting & infrastructure (AWS EU regions, Vercel, Supabase)	Run the Software	EU-only servers or Standard Contractual Clauses ("SCCs")
Email/SMS providers (SendGrid, Twilio)	Send program emails & reminders	SCCs
Payment processors (Stripe, PayPal)	Collect fees	SCCs
Analytics & error tracking (PostHog EU, Sentry EU)	Performance monitoring	Pseudonymisation
Professional advisers (accountants, lawyers)	Statutory compliance	NDA / client confidentiality

We do not allow advertising networks to track your Program data.

5. International transfers

Where a sub-processor is outside the EEA, we rely on:

- An adequacy decision (if applicable), or
- The EU SCCs plus supplementary safeguards (encryption, access controls).

6. How long do we keep data?

Data Type	Retention Period
Account & billing records	7 years (tax law)
Program Content	Life of the contract + 24 months, then deleted or returned on request
Funnel Performance Data	Raw logs 12 months; aggregated metrics indefinitely (non-identifiable)
Marketing email lists	Until you unsubscribe
Slack/Support messages	24 months after ticket closed

Back-ups are purged on a 30-day rolling cycle.

7. Security measures

- TLS encryption in transit
- AES-256 encryption at rest
- Role-based access & MFA for staff
- Annual penetration tests
- Incident-response plan with 72-hour breach notice

8. Cookies

We use essential cookies for login security, and analytics cookies to measure feature adoption. Analytics cookies are first-party and IP-anonymised. You can block cookies via browser settings; the Software remains functional but metrics may be less accurate.

9. Your rights

You may, at no cost:

- Access your data
- Rectify inaccurate data
- Erase data (in certain cases)
- Restrict processing
- Object to processing based on legitimate interest (including AI-model training)
- Port your data to another provider
- Withdraw consent at any time (marketing emails)

To exercise any right, email **privacy@courselaunchr.com**. We respond within one month.

If you believe we violate privacy law, you may lodge a complaint with the Dutch DPA (autoriteitpersoonsgegevens.nl).

10. Changes to this policy

We may update this Privacy Policy at any time without notification. Continued use of the Program after the effective date constitutes acceptance.

Questions?

Write to our Data Protection Officer, **Sprk Studios**, at **privacy@courselaunchr.com**.