

Privacy Policy

Last Updated: July 17, 2025

LetsGoFunnels ("we," "us," or "our") is committed to protecting your privacy and personal data. This Privacy Policy explains how we collect, use, process, and protect your information when you use our Booked Funnelbuilder Academy membership service ("Service").

1. Data Controller Information

Data Controller:

LetsGoFunnels
Rua 28 de Janeiro, nº 350
Vila Nova de Gaia, Portugal

Contact for Data Protection Matters:

Email: privacy@funnelsgenius.com
General Support: support@funnelsgenius.com
Website: www.funnelsgenius.com

2. Information We Collect

2.1 Personal Data You Provide

Account Registration:

- Full name
- Email address
- Billing address
- Phone number (optional)
- Company name (optional)

Payment Information:

- Credit card details (processed securely by Stripe)
- Billing history and transaction records
- VAT identification number (if applicable)

Communications:

- Support ticket content and correspondence

- Survey responses and feedback
- Community forum posts and interactions

2.2 Automatically Collected Data

Technical Information:

- IP address and geolocation data
- Device type, operating system, and browser information
- Screen resolution and device identifiers
- Referral URLs and traffic sources

Usage Analytics:

- Pages and content accessed within the membership area
- Time spent on specific modules and resources
- Download and completion tracking
- Login frequency and session duration
- Search queries within our platform

Cookies and Tracking Technologies:

- Session cookies for authentication
- Analytics cookies for usage tracking
- Preference cookies for personalized experience
- Marketing cookies for retargeting (with consent)

2.3 Third-Party Data

We may receive additional information about you from:

- Social media platforms (if you connect accounts)
- Marketing and analytics partners
- Public databases and industry directories
- Referral partners and affiliates

3. Legal Basis for Processing

Under GDPR, we process your personal data based on the following legal grounds:

Contract Performance (Article 6(1)(b)):

- Providing membership access and services
- Processing payments and billing
- Customer support and communication

Legitimate Interests (Article 6(1)(f)):

- Website analytics and service improvement
- Fraud prevention and security measures
- Marketing to existing customers
- Business operations and administration

Consent (Article 6(1)(a)):

- Marketing communications to prospects
- Non-essential cookies and tracking
- Third-party integrations requiring explicit consent

Legal Obligation (Article 6(1)(c)):

- Tax and accounting requirements
- Compliance with consumer protection laws
- Data breach notifications

4. How We Use Your Information

4.1 Service Provision

- **Account Management:** Creating, maintaining, and securing your membership account
- **Content Delivery:** Providing access to training materials, templates, and resources
- **Payment Processing:** Managing subscriptions, billing, and financial transactions
- **Technical Support:** Resolving issues and providing customer assistance

4.2 Communication

- **Service Communications:** Account notifications, billing statements, and service updates
- **Marketing Communications:** Product updates, new content announcements, and promotional offers
- **Educational Content:** Newsletters, tips, and industry insights
- **Community Engagement:** Forum notifications and member interactions

4.3 Analytics and Improvement

- **Usage Analytics:** Understanding how members interact with our content
- **Performance Optimization:** Improving platform speed and reliability
- **Content Development:** Creating new materials based on member interests
- **User Experience Enhancement:** Personalizing content recommendations

4.4 Legal and Security

- **Fraud Prevention:** Detecting and preventing unauthorized access or misuse
- **Compliance:** Meeting legal and regulatory requirements
- **Dispute Resolution:** Handling complaints and legal proceedings
- **Security Monitoring:** Protecting platform integrity and member data

5. Data Sharing and Third-Party Processors

We do not sell, rent, or trade your personal data. We share information only as described below:

5.1 Essential Service Providers

Payment Processing:

- Stripe Inc. (Payment processing) - Ireland/US
- PayPal Holdings Inc. (Alternative payments) - Ireland/US

Platform and Infrastructure:

- Whop (Membership platform) - US
- Cloudflare Inc. (Security and performance) - US

Email and Communications:

- Bento (Email marketing) - US

Analytics and Marketing:

- Google Analytics (Usage analytics) - Ireland/US
- Facebook/Meta (Marketing analytics) - Ireland/US
- Hotjar Ltd. (User behavior analytics) - Malta

5.2 Data Processing Agreements

All third-party processors are bound by:

- GDPR-compliant data processing agreements
- Appropriate technical and organizational security measures
- Restrictions on data use beyond specified purposes
- Obligations to notify us of any data breaches

5.3 International Data Transfers

When data is transferred outside the EU/EEA, we ensure adequate protection through:

- European Commission adequacy decisions
- Standard Contractual Clauses (SCCs)
- Binding Corporate Rules
- Certification schemes where applicable

5.4 Legal Disclosure

We may disclose your information when required by law or to:

- Comply with legal processes or government requests
- Protect our rights, property, or safety
- Prevent fraud or other illegal activities
- Enforce our Terms of Service

6. Cookies and Tracking Technologies

6.1 Cookie Categories

Strictly Necessary Cookies (Always Active):

- Authentication and session management
- Security and fraud prevention
- Load balancing and platform functionality

Analytics Cookies (Opt-out Available):

- Google Analytics for usage statistics
- Hotjar for user behavior analysis
- Internal analytics for service improvement

Marketing Cookies (Consent Required):

- Facebook Pixel for advertising optimization
- Google Ads for retargeting campaigns
- Third-party affiliate tracking

Preference Cookies (Opt-out Available):

- Language and region settings
- Content personalization
- Interface customization

6.2 Cookie Management

You can control cookies through:

- Our cookie consent banner
- Browser settings and preferences
- Third-party opt-out tools
- Direct contact with our support team

Disabling certain cookies may limit platform functionality.

7. Your Rights Under GDPR

As a data subject, you have the following rights:

7.1 Right of Access (Article 15)

Request confirmation of data processing and obtain a copy of your personal data.

7.2 Right of Rectification (Article 16)

Correct inaccurate or incomplete personal data.

7.3 Right of Erasure (Article 17)

Request deletion of your personal data under specific circumstances.

7.4 Right to Restrict Processing (Article 18)

Limit how we process your data in certain situations.

7.5 Right to Data Portability (Article 20)

Receive your data in a structured, machine-readable format.

7.6 Right to Object (Article 21)

Object to processing based on legitimate interests or for direct marketing.

7.7 Rights Related to Automated Decision-Making (Article 22)

Protection against solely automated decision-making with significant effects.

7.8 Right to Withdraw Consent

Withdraw consent for processing based on consent at any time.

7.9 Exercising Your Rights

To exercise any of these rights:

1. Email us at support@funnelsgenius.com
2. Include your full name and email address
3. Specify which right you wish to exercise
4. Provide verification of your identity

We will respond within 30 days of receiving your request.

8. Data Retention

8.1 Retention Periods

Active Membership Data:

- Retained during active subscription and for 30 days after cancellation

Financial Records:

- Billing and payment data retained for 7 years (tax law requirements)
- Transaction records kept for 10 years (anti-money laundering)

Marketing Data:

- Email marketing lists purged after 2 years of inactivity
- Website analytics data retained for 26 months

Legal and Compliance:

- Support tickets and communications kept for 3 years
- Security logs retained for 1 year

8.2 Deletion Process

Upon retention period expiry or valid deletion request:

- Personal data is permanently deleted from active systems
- Backups are overwritten within 90 days
- Anonymized data may be retained for statistical purposes

9. Data Security

9.1 Technical Safeguards

- **Encryption:** All data transmitted using TLS 1.3 encryption
- **Access Controls:** Role-based access with multi-factor authentication
- **Infrastructure:** Secure cloud hosting with regular security updates
- **Monitoring:** 24/7 security monitoring and threat detection

9.2 Organizational Measures

- **Staff Training:** Regular data protection training for all employees
- **Access Policies:** Strict need-to-know access controls
- **Incident Response:** Documented procedures for security breaches
- **Regular Audits:** Periodic security assessments and penetration testing

9.3 Data Breach Notification

In case of a data breach:

- Supervisory authorities notified within 72 hours (if required)
- Affected individuals notified without undue delay (if high risk)
- Breach register maintained with incident details

10. Children's Privacy

Our Service is not intended for individuals under 16 years of age. We do not knowingly collect personal data from children under 16. If we become aware that we have collected such data, we will delete it immediately and notify relevant authorities if required.

11. Marketing Communications

11.1 Subscription and Preferences

- **Existing Customers:** We may send service-related and marketing communications based on legitimate interest
- **Prospects:** Marketing communications require explicit consent
- **Preferences:** You can modify communication preferences in your account settings

11.2 Unsubscribe Options

Every marketing email includes:

- One-click unsubscribe links
- Preference management options
- Direct contact information for assistance

Unsubscribe requests are processed within 48 hours.

12. International Users

12.1 EU/EEA Residents

Full GDPR protections apply, including all rights outlined in Section 7.

12.2 UK Residents

UK GDPR protections apply with equivalent rights and safeguards.

12.3 California Residents (CCPA)

California residents have specific rights under the California Consumer Privacy Act:

- Right to know what personal information is collected
- Right to delete personal information
- Right to opt-out of sale of personal information
- Right to non-discrimination for exercising privacy rights

12.4 Other Jurisdictions

We comply with applicable local data protection laws and provide appropriate protections based on your location.

13. Third-Party Links and Services

Our platform may contain links to third-party websites or integrate with external services. This Privacy Policy does not apply to those third parties. We recommend reviewing their privacy policies before providing any personal information.

14. Business Transfers

In the event of a merger, acquisition, or sale of assets, your personal data may be transferred to the new entity. We will provide notice and ensure the receiving party commits to protecting your data according to this Privacy Policy.

15. Policy Updates

15.1 Notification of Changes

We may update this Privacy Policy to reflect:

- Changes in our data processing practices
- New legal or regulatory requirements
- Improvements to our security measures
- User feedback and requests

15.2 Communication of Updates

Material changes will be communicated through:

- Email notification to active members
- Prominent notice on our website
- In-platform notifications

Continued use of our Service after updates constitutes acceptance of the revised policy.

16. Supervisory Authority

You have the right to lodge a complaint with your local data protection authority. For users in Portugal, this is:

Comissão Nacional de Proteção de Dados (CNPd)

Address: Av. D. Carlos I, 134, 1º, 1200-651 Lisboa, Portugal

Phone: +351 213 928 400

Email: geral@cnpd.pt

Website: www.cnpd.pt

17. Contact Us

For any questions about this Privacy Policy or our data practices:

General Contact:

Email: support@funnelsgenius.com

Address: Rua 28 de Janeiro, nº 350, Vila Nova de Gaia, Portugal

Website: www.funnelsgenius.com

Response Time: We aim to respond to all privacy-related inquiries within 5 business days.

This Privacy Policy is effective as of July 17, 2025, and applies to all information collected by LetsGoFunnels from that date forward.