Privacy Policy

Racquet Sports Institute AI Agent

Operated by Racquet Sports Institute, Pavia, Italy

www.racquetsports.institute

Last updated: March 2026

This Privacy Policy explains how Racquet Sports Institute ("we", "us", or "our"), based in Pavia, Italy, collects, uses, stores, and protects your personal data when you use the Racquet Sports Institute AI Agent (the "Service").

We are committed to protecting your privacy and processing your data in accordance with the EU General Data Protection Regulation (GDPR), Regulation (EU) 2016/679, and other applicable data protection laws.

By accessing or using the Service, you acknowledge that you have read and understood this Privacy Policy. If you do not agree with these practices, please do not use the Service.

1. Data Controller

The data controller responsible for processing your personal data is:

Racquet Sports Institute

Pavia, Italy

Email: info@racquetsports.institute

Website: www.racquetsports.institute

2. What Data We Collect

2.1 Account Data

When you register for the Service, we collect:

- Email address
- Password (stored in hashed form only)
- Name (if provided)

Account creation and authentication may be handled through a third-party identity provider (such as Auth0 or Clerk). In that case, we receive only the data necessary for authentication and account management from that provider.

2.2 Profile Data

You may optionally provide profile information to improve the relevance of the Service, including:

- Primary and secondary sport (Padel, Pickleball, Squash, or other)
- Facility type (e.g. Commercial, Non-Profit/Club, School/University, Member Club, Add-on)
- Project phase (Idea, Planning, Construction, Operating, Expansion)
- Location (city, country, or street address)

- Project name and free-text project notes
- Response preferences (answer format, communication tone)

All profile data is voluntary. You can view, edit, or delete it at any time via the settings area of the Service.

2.3 Conversation Data

When you use the Service, we process:

- Your prompts, questions, and messages
- AI-generated responses
- Documents and files you upload for analysis
- Follow-up selections (Clarifier responses)
- PDF export requests

2.4 Memory Data

The Service includes an optional memory feature that stores contextual information across sessions to improve answer quality. Memory data may include:

- Facts, preferences, and project details extracted from your conversations (if "Auto-extract from conversations" is enabled)
- Information you add manually to the "What the Agent Knows About Me" section

Each memory entry is labelled with a category (Preference, Fact, Context, Project, or Other) and a source indicator (Explicit or Extracted). You have full control over memory data and can view, edit, or delete any entry at any time.

2.5 Usage and Technical Data

We may collect limited technical data necessary for operating the Service, such as:

- IP address (for security and abuse prevention)
- Browser type and version
- Timestamps of access and interactions
- Error logs and performance metrics

We do not use cookies for advertising or behavioural tracking. Any cookies used are strictly necessary for the operation of the Service (e.g. session management, authentication).

2.6 Location Data

If you provide a location (city or address) as part of your profile or within a question, the Service uses it to query external APIs for location intelligence (competitor mapping, transport access, climate data, economic context). The location is processed for this purpose only and is not shared with third parties for any other purpose.

3. How We Use Your Data

We process your personal data for the following purposes:

Purpose	Legal Basis (GDPR)

Providing the Service (processing prompts, generating AI responses, PDF exports)	Performance of contract (Art. 6(1)(b))
Account creation and authentication	Performance of contract (Art. 6(1)(b))
Storing profile and memory data to personalise responses	Consent (Art. 6(1)(a)) — you control these settings
Location intelligence queries (competitor mapping, transport, climate, economic data)	Performance of contract (Art. 6(1)(b))
Security, abuse prevention, and fraud detection	Legitimate interest (Art. 6(1)(f))
Service improvement and bug fixing (using anonymised and aggregated data only)	Legitimate interest (Art. 6(1)(f))
Compliance with legal obligations	Legal obligation (Art. 6(1)(c))

4. What We Do NOT Do with Your Data

This section describes commitments that are fundamental to how we operate:

- We do NOT use your conversations, project data, uploads, or any information you share to train or improve AI models. This is a permanent policy, not a setting that can be changed.
- We do NOT share your data with other users of the Service. Your project information, competitive assessments, and business plans remain strictly confidential.
- We do NOT sell, rent, or trade your personal data to third parties.
- We do NOT engage in behavioural tracking, profiling for advertising purposes, or cross-service data sharing.
- We do NOT build hidden profiles or collect data beyond what is described in this Privacy Policy.

5. Data Sharing and Third-Party Processors

We use a limited number of third-party service providers ("processors") to operate the Service. These processors act on our instructions and are contractually bound to process data only for the purposes we specify, in compliance with GDPR.

5.1 Categories of Processors

Category	Purpose	Data Processed
AI Model Provider	Processing prompts and generating AI responses	Prompts, conversation context (no persistent storage by provider)
Cloud Hosting	Application servers, database, knowledge base	All Service data (hosted in European data centres)

Authentication Provider	Account creation, login, identity verification	Email, authentication tokens
External Data APIs	Location intelligence (transport, climate, economic data)	Location coordinates (no personal data transmitted)

We ensure that all processors provide adequate data protection guarantees. We do not transfer personal data to countries outside the European Economic Area (EEA) unless appropriate safeguards are in place (e.g. Standard Contractual Clauses approved by the European Commission).

5.2 AI Model Provider

When you submit a prompt, the text of your prompt and relevant context are sent to the AI model provider for processing. The AI model provider:

- Processes the data solely to generate a response to your query
- Does not retain your data after the response is generated (zero data retention or equivalent contractual commitment)
- Does not use your data to train or improve its models

6. Data Storage and Hosting

All data is hosted exclusively in European data centres. This includes:

- Application servers and backend infrastructure
- PostgreSQL database (account data, profiles, conversation logs, memory entries)
- Weaviate vector database (knowledge base and document embeddings)
- Uploaded documents and files

No data is transferred to or stored in non-EU jurisdictions for processing or storage purposes. This ensures your data is protected under the strongest data protection framework in the world.

7. Data Retention

Data Type	Retention Period
Account data	Retained while your account is active. Deleted upon account deletion request.
Profile data	Retained while your account is active. You can edit or delete individual fields at any time.
Conversation data	Retained while your account is active. You can request deletion of specific conversations or all data.
Memory entries	Retained until you delete them or delete your account. You can delete individual entries at any time.
Uploaded documents	Retained while your account is active. You can delete individual files at any time.
Technical/usage logs	Retained for up to 90 days for security and debugging, then automatically deleted or anonymised.

When you request account deletion, all associated data (profile, conversations, memories, uploads) is permanently deleted. Some anonymised, aggregated data (e.g. usage statistics that cannot be linked to you) may be retained for service improvement.

8. Your Rights Under GDPR

Under the GDPR, you have the following rights regarding your personal data:

- Right of access (Art. 15) — You can request a copy of all personal data we hold about you. The "Export Data" function in the Privacy tab provides this in JSON format.
- Right to rectification (Art. 16) — You can correct inaccurate data via your profile settings or by contacting us.
- Right to erasure (Art. 17) — You can request deletion of your account and all associated data. The "Delete All Data" function in the Privacy tab provides this. Deletion is permanent and cannot be undone.
- Right to restriction of processing (Art. 18) — You can request that we restrict the processing of your data in certain circumstances.
- Right to data portability (Art. 20) — You can export your data in a structured, machine-readable format (JSON) via the Privacy tab.
- Right to object (Art. 21) — You can object to processing based on legitimate interest.
- Right to withdraw consent (Art. 7(3)) — Where processing is based on consent (e.g. memory features), you can withdraw consent at any time by disabling the relevant settings or deleting your data.

To exercise any of these rights, you can:

- Use the built-in data management tools in the Service (Profile settings, Privacy tab)
- Contact us at ai@racquetsports.institute

We will respond to your request within 30 days, as required by GDPR.

9. Data Security

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, alteration, disclosure, or destruction. These measures include:

- Encryption of data in transit (TLS/HTTPS)
- Encryption of data at rest where technically feasible
- Secure authentication mechanisms
- Access controls limiting data access to authorised personnel only
- Regular security reviews and updates

No system is completely secure. While we take reasonable precautions, we cannot guarantee absolute security. If we become aware of a data breach that poses a risk to your rights and freedoms, we will notify you and the relevant supervisory authority as required by GDPR (Art. 33–34).

10. Children

The Service is not intended for individuals under the age of 16 (or the applicable age of digital consent in your jurisdiction). We do not knowingly collect personal data from children. If we become aware that a child has provided us with personal data without appropriate parental consent, we will take steps to delete that data promptly.

11. International Users

The Service is operated from Italy and hosted in European data centres. If you access the Service from outside the European Economic Area, please be aware that your data will be transferred to and processed in the EU. By using the Service, you consent to this transfer. The EU provides a high level of data protection under the GDPR.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. When we make material changes, we will:

- Update the "Last updated" date at the top of this document
- Provide notice within the Service or by email where appropriate

We encourage you to review this Privacy Policy periodically. Your continued use of the Service after changes become effective constitutes acceptance of the updated Privacy Policy.

13. Supervisory Authority

If you believe that we have not adequately addressed your data protection concerns, you have the right to lodge a complaint with a supervisory authority. The lead supervisory authority for Racquet Sports Institute is:

Garante per la protezione dei dati personali

Piazza Venezia 11, 00187 Roma, Italy

Website: www.garanteprivacy.it

You may also contact the supervisory authority in your own EU/EEA member state.

14. Contact

If you have any questions about this Privacy Policy or our data practices, please contact us:

Racquet Sports Institute

Pavia, Italy

Email: info@racquetsports.institute

Website: www.racquetsports.institute