

# Privacy Policy for PowerValues.xyz

**Last Updated:** September 09, 2025

Thank you for visiting **PowerValues.xyz** (“**Power Values**,” “**we**,” “**our**,” or “**us**”). Your privacy matters to us. This Privacy Policy explains what data we collect, how we use it—including how our **AI coaching** features process information—and the choices you have. By using our websites, products, or services (the “**Services**”), you agree to this Policy and our [Cookies Policy] and [Terms of Use].

## 1) Scope & Roles

This Policy applies to visitors and users of our consumer Services and to organizational customers who license our Services for their teams.

- For individual users, **Power Values** is typically the **data controller** (GDPR/UK-GDPR) or “business” (CCPA/CPRA).
- For organizational customers (e.g., corporate programs), we act as a **data processor/service provider** for end-user data. In those cases, our processing is governed by a separate data processing agreement with the customer (the controller/business).

## 2) Key Definitions (Plain English)

- **Personal Data / Personal Information:** Any information that identifies or can reasonably be linked to you.
- **Sensitive Personal Information (SPI):** Certain categories defined by law (e.g., precise location, health data, religious views).
- **AI Coach:** Our AI-powered feature that provides values-based coaching prompts, insights, and feedback.
- **Automated Decision-Making & Profiling:** When software analyzes data to offer personalized outputs. Our AI suggests content and actions but does **not** make decisions that produce legal or similarly significant effects without a human in the loop.

## 3) Information We Collect

### A. Information You Provide

- **Account & Contact Data:** Name, email, password or SSO identifier, phone (optional).
- **Program Inputs:** Quiz responses, value selections, weekly reflections, goals, exercises, files or notes you submit.
- **Coaching Interactions:** Messages you write to the AI Coach or human coaches, session ratings, feedback forms.
- **Purchases:** Billing name, email, transaction IDs, and limited payment details handled via our processors (e.g., Stripe, PayPal).
- **Support Requests:** Questions, bug reports, and related correspondence.

**Sensitive data caution:** Coaching reflections may include information about health, relationships, beliefs, or other sensitive topics. Please share only what you are comfortable sharing. Where required by law, we will obtain your **explicit consent** to process such information.

### B. Information We Collect Automatically

- **Technical Data:** IP address, device and browser type, OS, referral URL, pages viewed, time on page.
- **Usage Data:** Clicks, session length, features used, error logs.
- **Cookies/Similar Tech:** See our [Cookies Policy] for details and opt-outs.

### C. Information from Third Parties

- **Vendors & Partners:** Analytics, payments, authentication, marketing tools.
- **Enterprise Customers:** For team accounts, we may receive user roster info from your employer (name, email, role).

## 4) How We Use Data (Purposes)

## A. Core Service Delivery

- Provide, maintain, and improve the **Power Values Training Series**, quiz, dashboards, and AI Coach.
- Personalize content and suggestions (e.g., aligning prompts with your Top 10 Power Values).
- Authenticate users, secure accounts, and prevent abuse or fraud.

## B. AI Coaching & Personalization

- **Generate coaching prompts** and feedback tailored to your values, goals, and recent reflections.
- **Remember context** across sessions to reduce repetition and increase relevance.
- Offer **explanations** (on request) of why an AI suggestion was made (e.g., “based on your stated priority of Integrity and your last reflection...”).

## C. Research & Product Improvement

- Analyze de-identified or aggregated data to improve outcomes, user experience, and model quality.
- Conduct **safety and quality assurance** testing (e.g., prompt injection resistance, bias checks).

### Model training policy:

- We do **not** sell your data.
- We do **not** use your identifiable content to train third-party foundation models.
- We may use **de-identified** or **aggregated** data to improve our own coaching logic, prompts, guardrails, and product features.
- Where applicable law requires consent for any training-related use, we will request it and provide opt-out choices.

## D. Communications

- Service messages (e.g., account, security, feature updates).
- With your consent: newsletters, program updates, promotions (you can opt out anytime).

## E. Legal, Security, and Compliance

- Detect, investigate, and prevent security incidents and misuse.
- Comply with legal obligations and enforce our terms.

# 5) AI Transparency & Your Choices

## A. What the AI Coach Does—and Doesn't Do

- The AI Coach **analyzes** your quiz results and inputs to suggest values-aligned actions, prompts, and reflective questions.
- It does **not** make legal, medical, or mental-health diagnoses; it provides **educational and coaching** support only.
- It does **not** make automated decisions with legal or similarly significant effects. You can always ask for **human review**.

## B. Human in the Loop

You can request **human review** of AI recommendations or opt for **human-only coaching** if available in your plan.

## C. Opting Out of AI Personalization

You may choose to:

- **Limit AI personalization** (the AI won't use your historical reflections to tailor outputs), or
- **Disable AI features** and use only non-AI materials and live coaching (where available).  
Note: some functionality may be reduced if AI features are disabled.

## 6) Legal Bases (GDPR/UK-GDPR)

Where applicable, we process your data under one or more of the following bases:

- **Consent:** e.g., marketing emails, cookies, certain sensitive topics in reflections.
- **Contract:** to deliver the Services you requested.
- **Legitimate Interests:** product improvement, security, and preventing abuse (balanced against your rights).
- **Legal Obligations:** compliance, record-keeping, tax.

## 7) “Notice at Collection” (CCPA/CPRA – California)

We collect identifiers (e.g., contact info), commercial info (transactions), internet/technical data (cookies/usage), and **inferences** (e.g., values profile) to provide and improve the Services, personalize coaching, and secure the platform. We **do not sell** personal information. Some analytics/advertising integrations may constitute “**sharing**” under California law; you can **opt out of sharing** via our cookie banner or [Do Not Sell/Share My Personal Information] link.

You may also **limit use** of sensitive personal information where required by law.

## 8) Sharing & Disclosure

We **do not sell** your personal data. We share it only as described below:

- **Service Providers / Processors:** Email, payments, hosting, analytics, security, and **AI infrastructure providers** that help us run the Services. They are bound by contracts to use data only for our specified purposes and to safeguard it.
- **Enterprise Accounts:** If you use Power Values through your employer, we may share usage summaries or progress indicators with your organization per their program configuration (we'll disclose what is shared at enrollment).
- **Legal & Safety:** To comply with law, enforce our terms, or protect rights, safety, and property.
- **Business Transfers:** In case of merger, acquisition, or asset sale, we may transfer data subject to this Policy.

We maintain a list of our core subprocessors and infrastructure partners internally.

## 9) Data Retention

- **Account Data:** Kept for the life of your account.
- **Coaching Inputs (reflections, messages):** By default, retained for **24 months** after your last activity, then deleted or de-identified, unless a longer period is legally required or you ask us to delete sooner.
- **Transactional Records:** Retained as required for tax, accounting, and legal compliance.
- **De-Identified Data:** We may retain de-identified/aggregated datasets for research and product improvement.

You may request deletion at any time (subject to legal exceptions).

## 10) Security

We use industry-standard technical and organizational safeguards, including:

- Encryption in transit (HTTPS/TLS) and at rest for core data stores.
- Access controls, least-privilege permissions, MFA for administrative access.
- Auditing, logging, and vendor security reviews.  
No system is 100% secure; please use strong passwords and protect your account.

## 11) International Data Transfers

We may process data in the United States and other countries. Where required, we use lawful transfer mechanisms (e.g., **Standard Contractual Clauses** or equivalent) to protect your information.

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## 12) Your Privacy Rights

### A. EEA/UK (GDPR/UK-GDPR)

- **Access, Correction, Deletion, Restriction, Portability**
- **Object** to certain processing (including direct marketing)
- **Withdraw Consent** at any time without affecting prior lawful processing
- **Not be subject** to a decision based solely on automated processing producing legal/similar significant effects

## **B. US State Rights (e.g., CA/VA/CO/CT/UT—varies by state)**

- **Know/Access** categories and specific pieces of personal information
- **Delete** personal information
- **Correct** inaccuracies
- **Opt out** of targeted advertising / sharing and certain profiling
- **Non-discrimination** for exercising your rights
- **Limit use** of sensitive personal information (where applicable)

## **C. Exercising Your Rights**

Email [support@powervalues.xyz](mailto:support@powervalues.xyz) with the subject “**Privacy Request**”. We may need to verify your identity (and, for CA, agent authorization). We aim to respond within the legal timeframes.

## **13) Children’s Privacy**

Our Services are **not intended for children under 13** (or under 16 in some jurisdictions). We do not knowingly collect data from children. If you believe a child has provided data, contact us and we will delete it.

## **14) Coaching Confidentiality & Disclaimers**

- **Coaching, not therapy or medical care:** Power Values provides educational and coaching tools. We do not provide medical, psychological, or legal advice and are **not a HIPAA-covered entity**.

- **Sensitive Topics:** You control what you share. If you disclose sensitive information, we process it to provide the coaching you requested, subject to your consent (where required) and this Policy.
- **Emergency:** Do not use Power Values for emergencies. If you are in crisis or at risk of harm, contact local emergency services or a qualified professional immediately.

## 15) Cookies & Tracking

We use cookies and similar technologies for essential functionality, analytics, and (with consent) advertising. For details and controls, see our [Cookies Policy]. You can adjust preferences via our cookie banner or browser settings.

**Do Not Track:** We currently do not respond to browser DNT signals. Use our in-product privacy controls instead.

## 16) AI & Third-Party Model Providers

- We may use third-party AI infrastructure providers under strict data protection terms.
- We implement **content filters, safety guardrails, and human review** processes to reduce harmful or biased outputs.
- We periodically evaluate models and prompts for quality, fairness, and relevance to values-based coaching.
- Unless you explicitly consent, we do **not** allow third-party model providers to use your identifiable content to train their general models.

We will maintain current information about our AI vendors and subprocessors internally.

## 17) Managing Your Information

- **Profile & Preferences:** Update account info and communication preferences in your profile.
- **Download Your Data:** Request an export at [support@powervalues.xyz](mailto:support@powervalues.xyz).
- **Delete Your Data:** Request deletion at [support@powervalues.xyz](mailto:support@powervalues.xyz) (subject to legal exceptions).

- **AI Settings:** In your account, you may **limit AI personalization** or **disable AI features** (where available).

## 18) Changes to This Policy

We may update this Policy to reflect operational or legal changes. We will post updates here with a new “**Last Updated**” date. Material changes may be announced via email or in-app notice. Continued use of the Services means you accept the updated Policy.

## 19) Contact Us

**Email:** support@powervalues.xyz

**Mailing Address:** [3304 Calle De El Cortez, Las Vegas, NV 89102](https://www.google.com/maps/place/3304+Calle+De+El+Cortez,+Las+Vegas,+NV+89102)

**Subject Line:** Privacy Inquiry

If you have an unresolved privacy concern, you may also contact your local data protection authority.

## 20) Regional Disclosures (Summary)

- **EEA/UK:** Visioneer LLC dba Power Values is the controller unless your organization is the controller. For transfers outside the EEA/UK, we rely on approved mechanisms (e.g., SCCs).
- **California:** We do not sell personal information. You can opt out of “sharing” for cross-context behavioral advertising via our cookie banner or [Do Not Sell/Share] link. You may limit our use of SPI as required by law.
- **Other US States:** We provide targeted advertising/profiling opt-outs and honor additional rights where laws require.

### Quick Reference: Your AI-Related Choices

- **Explainability:** Ask “why did I get this suggestion?” in the product or via support.
- **Human Review:** Request a human review of any AI guidance.
- **Limit Personalization:** Toggle AI personalization off in settings.

- **Disable AI:** Use the program without AI features (where available).
- **Delete or Export:** Request deletion/export of your reflections and AI interactions.