Privacy Notice: Marketing, Sales and Website

Last updated 13 November 2026

This notice explains how Blokki AI Oy processes personal data in its marketing and sales: when you visit the blokki.ai website, subscribe to our newsletter, contact us, are contacted by us as a potential customer, communicate with us by email or on WhatsApp, or see our advertising. It also covers the data of our customers' contact persons that we keep in our customer relationship management system. It is based on the EU General Data Protection Regulation (GDPR).

The processing of data in the Blokki software and app, including the data of app users, is described in a separate product **Privacy notice**. Please note that some of the tools we use in marketing and sales may process data in the United States (see section 6).

1. Controller

Blokki AI Oy
Business ID: 3500099-1
Postal address: Lankkukatu 3, 08100 Lohja, Finland
Email: support@blokki.ai

Contact person for data protection matters: Janne Hautala, janne.hautala@blokki.ai, +358 40 841 8547

2. Purposes and legal bases

Purpose	Examples	Legal basis
Responding to enquiries and demo requests	Messages sent via forms, email or WhatsApp; scheduling a demo	Steps prior to entering into a contract (Art. 6(1)(b)) or legitimate interest (Art. 6(1)(f))
Identifying and contacting potential customers	Finding coaching and wellness businesses and employers that may benefit from Blokki; preparing and sending a personalised first message, with the help of AI tools (see section 11)	Legitimate interest in business-to-business sales
Newsletter and email marketing	News, tips for coaches, event and webinar invitations	Consent. Marketing relevant to your work role sent to your work email address at a company: legitimate interest, until you object
Measuring email engagement	Whether newsletter emails are opened and which links are clicked	Consent (given when subscribing to the newsletter)
Customer relationship and sales management	Contact and communication history in HubSpot, follow-up of offers and meetings	Legitimate interest; for customers, also performance of contract

Purpose	Examples	Legal basis
Assessing interest in our services	Combining form submissions, email clicks and, with your consent, website visits to decide which content and offers are relevant to you and which contacts to follow up first	Legitimate interest; website data only with consent (cookies)
Website analytics	Google Analytics 4	Consent (cookies)
Targeted advertising and ad measurement	Meta Pixel; advertising on Facebook and Instagram	Consent (cookies)
Customer communication with an AI agent	Answering enquiries and support requests by email and on WhatsApp, routing messages to the right person	Performance of contract (customers) or legitimate interest
Operating and securing the website	Technical logs, preventing misuse	Legitimate interest
Legal obligations	Bookkeeping, documentation of consents	Legal obligation (Art. 6(1)(c))

Where processing is based on legitimate interest, we have balanced our interest against your rights and concluded that the processing is limited to what you can reasonably expect in a business context. You can object to such processing at any time. If you object to direct marketing, we will stop it without further assessment.

Assessing interest in our services involves profiling. It does not lead to decisions that have legal or similarly significant effects on you, and we do not make decisions based solely on automated processing.

3. Data we process

- **Contact details:** name, email, phone number, company and role (e.g. personal trainer, coach)
- **Professional information from public sources:** business name, business ID, website, area of expertise and services, and information from public business profiles on social media
- **Communications:** form content, emails, WhatsApp messages, meeting notes
- **Marketing choices:** newsletter subscriptions and unsubscribes, objections, consents and their timestamps
- **Email engagement data:** email opens and link clicks
- **Website usage data:** pages visited, time of visits, device and browser information, approximate location, referring source and cookie identifiers
- **Advertising data:** ad clicks and their identifiers, campaign results
- **Technical data:** IP address and log data generated when you use the website

We do not ask for health data or other special categories of personal data in our marketing and sales, and we do not enter such data into AI tools ourselves. If you include such data in a message to us, it may be processed by our AI agent (see section 11).

4. Sources of data

We mainly receive data directly from you, for example through forms, email and WhatsApp. Website and advertising usage data is collected with cookies if you have given your consent. We may also receive data from events you have registered for.

When we look for potential customers, we collect business contact information from public sources such as company websites, the Finnish Business Information System (YTJ) and public business profiles on social media. If we have collected your data in this way, we tell you so and link to this notice in our first message to you at the latest.

5. Recipients

We do not sell your personal data. We use the following service providers. Most process data only on our behalf (processors). Meta is a joint controller with us for data collected with the Meta Pixel and also processes data for its own purposes.

Service	Purpose	Role
HubSpot Ireland Ltd (group company of HubSpot, Inc.)	Customer relationship management (CRM), forms, newsletters, website analytics	Processor
Microsoft Ireland Operations Ltd (Microsoft Azure)	Hosting of the website and our own AI tools and their data (EU)	Processor
Anthropic (Claude models, accessed through Microsoft Foundry)	Language models for our own sales tool and the customer communication AI agent	Processor
Microsoft Ireland Operations Ltd (Microsoft 365)	Email, calendar and online meetings	Processor
WhatsApp Ireland Ltd (WhatsApp Business Platform)	Customer communication on WhatsApp	Processor
Google Ireland Ltd (Google Analytics 4)	Website analytics	Processor
Meta Platforms Ireland Ltd (Meta Pixel, Facebook and Instagram advertising)	Ad targeting and measurement	Joint controller for data collection; independent controller for its own purposes
Usercentrics A/S (Cookiebot)	Managing and recording cookie consents	Processor

Under our joint controller arrangement with Meta (Controller Addendum), we are responsible for informing you and for obtaining your consent before the Meta Pixel collects data, and Meta is responsible for its own subsequent processing. You can exercise your rights regarding that processing directly with Meta; see Meta's Privacy Policy. We may disclose data to authorities where required by law.

6. Transfers outside the EU/EEA

Some of the tools we use in marketing and sales process personal data in the United States:

- **Anthropic (Claude):** our sales tool and our customer communication AI agent use Claude models through Microsoft Foundry in a global deployment. Data processed by them, such as public business information, message drafts and the content of messages you send us by email or on WhatsApp, may be processed outside the EU, including in the United States.
- **HubSpot, Google and Meta** may process data in the United States.
- **WhatsApp:** the content of WhatsApp messages is stored in the EU, but Meta may process messages temporarily in its data centres outside the EU, including in the United States, while delivering them.

Transfers are based on the European Commission's adequacy decision for the EU–US Data Privacy Framework where the recipient is certified under it, and otherwise on the Commission's Standard Contractual Clauses. You can contact us to obtain information on the safeguards for transfers.

Our own tools and the data stored in them are hosted in the EU.

7. Retention periods

Data	Retention period
Newsletter subscriber data	Until you unsubscribe; the unsubscribe record is kept so that we do not send you messages again
Potential customers we have contacted who have not responded	12 months from our last contact attempt
Leads and enquiries that did not result in a customer relationship	24 months from the last activity, such as an enquiry, form submission or newsletter link click
Customer contact persons' data	For the duration of the customer relationship and 24 months after it ends
Objections to direct marketing	As long as needed to respect the objection
Consent records	For as long as the consent is valid and thereafter as needed for legal claims
Google Analytics user and event data	14 months
Cookies	See the table in our **Cookie policy**
AI agent conversations (email and WhatsApp)	12 months from the end of the conversation
Technical log data of the website and our own tools	Up to 90 days

8. Your rights

You have the right to:

- access your data and receive a copy of it

- request rectification of inaccurate data
- request erasure of your data
- request restriction of processing
- object at any time to processing based on legitimate interest and, without giving reasons, to direct marketing and related profiling
- receive the data you have provided to us in a machine-readable format, where processing is based on consent or contract
- withdraw your consent at any time; withdrawal does not affect the lawfulness of processing before the withdrawal

You can unsubscribe from the newsletter via the link at the end of each message and withdraw cookie consent via the Cookie settings link in the website footer. Other requests can be sent to support@blokki.ai. We respond within one month.

Providing your data is voluntary. If you do not provide your contact details, we cannot respond to your enquiry or send you the newsletter.

9. Data security

Only Blokki AI Oy employees who need the data for their work have access to it. We use personal user accounts, two-factor authentication and encrypted connections. Our service providers are bound to data protection by contract.

10. Right to lodge a complaint

If you believe that we process your data unlawfully, you can lodge a complaint with the Office of the Data Protection Ombudsman in Finland (tietosuoja.fi). We hope you will contact us first so that we can resolve the matter.

11. Use of AI in marketing, sales and customer communication

AI-assisted sales work. We use a sales tool we have built ourselves on Microsoft Azure. It uses Anthropic's Claude language models, accessed through Microsoft Foundry, to help us find potential customers from public sources, summarise public business information and draft personalised messages.

- **Human involvement:** a member of our team reviews every message before it is sent.
- **Data processed:** public business information, contact details and our earlier communication with you. We do not enter special categories of personal data into the tool.
- **Model training:** the provider processes data only on our behalf and does not use it to train AI models.
- **Location:** data may be processed outside the EU, including in the United States (see section 6).

AI agent in customer communication. We use an AI agent we have developed ourselves for enquiries, support requests and other customer communication by email and on WhatsApp. The agent assists our team but does not replace it.

- **Transparency:** we always tell you when you are communicating with the AI agent.
- **Data processed:** the content of your message, your contact details and, where needed, information about your customer relationship, such as your licence and the number of your clients. The agent has no access to the Blokki software or to the data of app users.
- **Human involvement:** you can ask for your matter to be handled by a person at any time. The agent refers complex matters to our team and does not make decisions that have legal or similarly significant effects on you.
- **Language model:** the agent uses Anthropic's Claude models through Microsoft Foundry. The provider processes data only on our behalf and does not use it to train AI models. Messages may be processed outside the EU, including in the United States (see section 6).
- **Retention:** conversations are kept for 12 months to ensure service quality.

The AI assistant inside the Blokki app is described in the product privacy notice. Please do not send health data or other sensitive information in messages unless it is necessary for your matter.

12. Changes

We may update this notice when our operations or legislation change. The date of the latest update is shown at the top of this notice. We will announce significant changes on our website or by email.