

Last Updated: 2026-01-14

## **COLDI LABS LTD. – PRIVACY POLICY**

This Privacy Policy explains how Coldi Labs Ltd. (“Coldi”, “we”, “us”, or “our”) collects, uses, discloses, and protects Personal Data in connection with:

- our website(s);
- our AI-based voice platform and related services (the “Services”); and
- ancillary, auxiliary, and technical enablement services provided in connection with the Services.

This Privacy Policy should be read together with Coldi’s Master Services Agreement / Terms of Use and any applicable Service Order.

Where Coldi processes Personal Data on behalf of a Client, the Data Processing Addendum (DPA) applies and prevails in the event of any conflict.

### **1. ROLES AND SCOPE**

#### **1.1 Controller vs. Processor Roles**

Coldi’s role depends on the context of the processing:

##### **A. Coldi as Data Controller**

Coldi acts as a data controller with respect to Personal Data processed in connection with:

- website operation and analytics;
- sales, marketing, and business communications;
- account administration, billing, and contract management;
- security, fraud prevention, and compliance.

##### **B. Coldi as Data Processor**

Where Clients use the Services (including AI voice agents, call handling, transcription, analytics, and related functionality), the Client acts as the Data Controller and Coldi acts solely as a Data Processor, processing Personal Data only on the Client’s documented instructions, as set out in the applicable agreement and DPA.

Call recipients, end customers, and callers generally have a direct relationship with the Client, not with Coldi. Clients remain solely responsible for providing required notices and obtaining all necessary consents, including for automated interactions, AI usage, and call recording.

#### **1.2 Ancillary and Managed Services**

In addition to providing a hosted software-as-a-service (SaaS) platform, Coldi may provide ancillary and auxiliary services, including:

- onboarding and configuration assistance;
- prompt, script, and workflow structuring support;
- testing, troubleshooting, and technical deployment;

- managed technical operation of AI agents where expressly agreed.

Provision of such ancillary services does not alter the allocation of roles under applicable data protection laws. Coldi does not determine the purposes or essential means of processing Client call data and does not act as a call center, telemarketing provider, or communications originator.

Any assistance provided by Coldi in connection with ancillary services is strictly technical and operational and does not constitute legal, regulatory, or compliance advice.

## **2. PERSONAL DATA WE PROCESS**

### **2.1 Data You Provide Directly (Controller Context)**

- name, email address, phone number;
- company name, role, and business contact details;
- account credentials and preferences;
- billing, invoicing, and payment-related information;
- communications with sales, support, or account teams.

### **2.2 Data Collected Automatically (Controller Context)**

- IP address, browser type and version, device identifiers;
- usage logs, timestamps, and diagnostics;
- website analytics and security logs;
- cookies and similar tracking technologies.

### **2.3 Call and AI-Related Data (Processor Context)**

When Clients use the Services, Coldi may process:

- call audio and recordings;
- voice streams and transcripts;
- call metadata (timestamps, duration, routing, outcomes);
- call logs, analytics, and system diagnostics;
- scripts, prompts, workflows, and other Client-provided content.

### **2.4 Technical Credentials and Integrations**

In the course of providing the Services and ancillary services, Coldi may securely store technical credentials (such as API keys, access tokens, webhook URLs, or similar identifiers) strictly as necessary to operate integrations and technical connections on behalf of Clients. Such credentials are protected by appropriate technical and organizational security measures and are used solely for service operation.

### **2.5 Phone Number Provisioning**

Where phone numbers are provisioned or integrated via third-party telecommunications providers, Coldi processes related metadata solely as a technical intermediary and strictly on

Client instruction. Coldi does not independently select call recipients, determine calling purposes, or act as a call originator.

Coldi does not intend to process special categories of Personal Data unless expressly instructed by the Client and permitted by applicable law.

### **3. PURPOSES OF PROCESSING**

#### **3.1 Controller Processing Purposes**

Coldi processes Personal Data as a controller to:

- operate and secure our website and internal systems;
- provide account administration and customer support;
- manage billing, payments, and contractual relationships;
- communicate service-related notices and updates;
- improve service performance, reliability, and security;
- detect, prevent, and investigate fraud or misuse;
- comply with legal, regulatory, and contractual obligations.

#### **3.2 Processor Processing Purposes**

Where acting as a processor, Coldi processes Personal Data solely to provide, operate, support, secure, and maintain the Services, in accordance with Client instructions and the DPA.

#### **3.3 Aggregated and De-Identified Data**

Coldi may use aggregated, anonymized, or irreversibly de-identified data for service operation, analytics, and improvement.

Coldi does not use Client Personal Data to develop or train generalized artificial intelligence models, except where such data has been aggregated and anonymized so that no individual or Client can be identified.

### **4. LEGAL BASES (WHERE APPLICABLE)**

When acting as a controller, Coldi relies on:

- performance of a contract;
- legitimate interests (including security, service improvement, and fraud prevention);
- compliance with legal obligations;
- consent, where required by law.

When acting as a processor, the Client determines the lawful basis for processing.

### **5. COOKIES AND TRACKING TECHNOLOGIES**

Coldi uses cookies and similar technologies to enable core functionality, enhance security, remember preferences, and analyze website usage.

You may control cookies through browser settings. Disabling cookies may affect functionality.

## **6. DISCLOSURE OF PERSONAL DATA**

Coldi may disclose Personal Data to:

- service providers and subprocessors under contractual safeguards;
- affiliates for internal business operations;
- regulators, authorities, or law enforcement where required by law;
- professional advisors such as auditors and legal counsel;
- third parties in connection with corporate transactions.

Where Coldi acts as a processor, disclosures and subprocessors are governed by the DPA.

## **7. INTERNATIONAL DATA TRANSFERS**

Personal Data may be processed in jurisdictions outside your country, including Israel and locations where Coldi or its service providers operate.

Where required, Coldi implements appropriate safeguards such as adequacy decisions or Standard Contractual Clauses (SCCs).

## **8. DATA RETENTION**

Coldi retains Personal Data only for as long as necessary for the purposes described in this Policy and to comply with legal and contractual obligations.

For Client data processed as a processor, retention and deletion are governed by the DPA and applicable law.

## **9. SECURITY**

Coldi implements appropriate technical and organizational measures to protect Personal Data, including access controls, encryption in transit, monitoring, and incident response procedures. No system is completely secure, but Coldi complies with applicable breach notification requirements.

## **10. DATA SUBJECT RIGHTS**

Subject to applicable law, individuals may have rights to access, correct, delete, restrict, or object to processing, and to data portability.

Where Coldi acts as a processor, requests should generally be directed to the Client, and Coldi will assist in accordance with the DPA.

## **11. CHILDREN'S DATA**

The Services are not intended for children, and Coldi does not knowingly collect Personal Data from children where prohibited by law.

## **12. UPDATES TO THIS POLICY**

Coldi may update this Privacy Policy from time to time. Updates will be posted on our website and become effective as of the stated date.

## **13. CONTACT INFORMATION**

Coldi Labs Ltd.  
Email: [legal@coldi.ai](mailto:legal@coldi.ai)